1 2 3 4 5 6 7 8	Michael D. McLachlan (State Bar No. 18170 LAW OFFICES OF MICHAEL D. McLA 523 West Sixth Street, Suite 215 Los Angeles, California 90014 Telephone: (213) 630-2884 Facsimile: (213) 630-2886 mike@mclachlanlaw.com  Daniel M. O'Leary (State Bar No. 175128) LAW OFFICE OF DANIEL M. O'LEAR' 523 West Sixth Street, Suite 215 Los Angeles, California 90014 Telephone: (213) 630-2880 Facsimile: (213) 630-2886 dan@danolearylaw.com  Attorneys for Plaintiff	CHLAN, APC
10	CUREDIOD COURT FOR TV	
11	SUPERIOR COURT FOR THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES	
12		
13	Coordination Proceeding Special Title (Rule 1550(b))	Judicial Council Coordination Proceeding No. 4408
14 15	ANTELOPE VALLEY GROUNDWATER CASES	(Santa Clara Case No. 1-05-CV-049053, Honorable Jack Komar)
16 17 18	RICHARD A. WOOD, an individual, on behalf of himself and all others similarly situated,  Plaintiff,	Case No.: BC 391869  DECLARATION OF TIMOTHY J. THOMPSON IN SUPPORT RENEWED OF MOTION FOR APPOINTMENT OF EXPERT
19	v.	
20 21	LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40; et al.	Date: April 24, 2009 Time: 9:00 a.m. Dept.: 1
22	· Defendants.	
23		
24		
25		
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28	DECLARATION OF TIMOTHY J. THOMPSON IN SUPPORT OF RENEWED MOTION FOR APPOINTMENT OF EXPERT	

## I, Timothy J. Thompson, declare:

- I make this declaration of my own personal knowledge, except where stated on information and belief, and if called to testify in Court on these matters, I could do so competently.
- 2. I am a Vice President at Entrix, and a certified hydrogeologist in the State of California with extensive experience in consulting on public water supply issues. My background and experience are discussed at more length in my curriculum vitae, a true and correct copy of which is attached as Exhibit 1 to this declaration.
- 3. Pending successful resolution of this Motion, I have agreed to serve as a court appointed consultant on various matters relevant to the members of the Small Pumpers' Class, including developing evidence related to claims of "beneficial use" and the "self-help". A copy of my proposal for presently anticipated consulting services is attached as Exhibit 2.
- 4. My time is currently billed at \$275 per hour for general consulting work, and at \$412 per hour for deposition and trial testimony. I anticipate a number of Entrix staff members will be called on to work on this project, and the billing rates for the various classes of Entrix staff members are generally consistent with the billing rates for similar firms in California, many of whom are actively engaged in this litigation.

I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct. Executed this 26th day of March, 2009, at Santa Barbara, California.

Timothy J./Thompsop, P.G

## PROOF OF SERVICE

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I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action. My business address is 523 West Sixth Street, Suite 215, Los Angeles, California 90014.

On March 30, 2009, I caused the foregoing document(s) described as **DECLARATION OF TIMOTHY J. THOMPSON IN SUPPORT OF RENEWED MOTION FOR APPOINTMENT OF EXPERT** to be served on the parties in this action, as follows:

- (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa Clara County Superior Court website: <a href="www.scefiling.org">www.scefiling.org</a> regarding the Antelope Valley Groundwater matter.
- ( ) (BY U.S. MAIL) I am readily familiar with the firm's practice of collection and processing of documents for mailing. Under that practice, the above-referenced document(s) were placed in sealed envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and deposited such envelope(s) with the United States Postal Service on the same date at Los Angeles, California, addressed to:
- ( ) (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other overnight delivery service, for delivery on the next business day. Each copy was enclosed in an envelope or package designed by the express service carrier; deposited in a facility regularly maintained by the express service carrier or delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees paid or provided for; addressed as shown on the accompanying service list.
- ( ) (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of facsimile transmission of documents. It is transmitted to the recipient on the same day in the ordinary course of business.
- (X) (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Carol Delgado

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DECLARATION OF TIMOTHY J. THOMPSON IN SUPPORT OF RENEWED MOTION FOR APPOINTMENT OF EXPERT