

1 Michael D. McLachlan (State Bar No. 181705)
2 **LAW OFFICES OF MICHAEL D. McLACHLAN, APC**
3 523 West Sixth Street, Suite 215
4 Los Angeles, California 90014
5 Telephone: (213) 630-2884
6 Facsimile: (213) 630-2886
7 mike@mclachlanlaw.com

8 Daniel M. O'Leary (State Bar No. 175128)
9 **LAW OFFICE OF DANIEL M. O'LEARY**
10 523 West Sixth Street, Suite 215
11 Los Angeles, California 90014
12 Telephone: (213) 630-2880
13 Facsimile: (213) 630-2886
14 dan@danolearylaw.com

15 Attorneys for Plaintiff

16 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
17 **COUNTY OF LOS ANGELES**

18 Coordination Proceeding
19 Special Title (Rule 1550(b))

20 ANTELOPE VALLEY GROUNDWATER
21 CASES

22 RICHARD A. WOOD, an individual, on
23 behalf of himself and all others similarly
24 situated,

25 Plaintiff,

26 v.

27 LOS ANGELES COUNTY
28 WATERWORKS DISTRICT NO. 40; et al.

Defendants.

Judicial Council Coordination
Proceeding No. 4408

(Santa Clara Case No. 1-05-CV-049053,
Honorable Jack Komar)

Case No.: BC 391869

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

Date: April 24, 2009
Time: 9:00 a.m.
Dept.: 1

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

1 I, Timothy J. Thompson, declare:

2 1. I make this declaration of my own personal knowledge, except where stated
3 on information and belief, and if called to testify in Court on these matters, I could do so
4 competently.

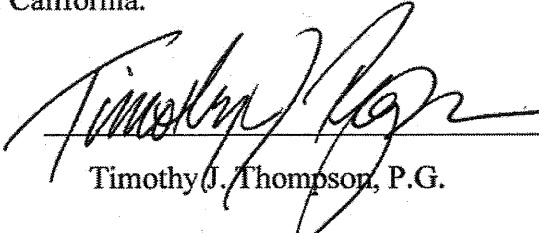
5 2. I am a Vice President at Entrix, and a certified hydrogeologist in the State
6 of California with extensive experience in consulting on public water supply issues. My
7 background and experience are discussed at more length in my curriculum vitae, a true
8 and correct copy of which is attached as Exhibit 1 to this declaration.

9 3. Pending successful resolution of this Motion, I have agreed to serve as a
10 court appointed consultant on various matters relevant to the members of the Small
11 Pumpers' Class, including developing evidence related to claims of "beneficial use" and
12 the "self-help". A copy of my proposal for presently anticipated consulting services is
13 attached as Exhibit 2.

14 4. My time is currently billed at \$275 per hour for general consulting work,
15 and at \$412 per hour for deposition and trial testimony. I anticipate a number of Entrix
16 staff members will be called on to work on this project, and the billing rates for the
17 various classes of Entrix staff members are generally consistent with the billing rates for
18 similar firms in California, many of whom are actively engaged in this litigation.

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

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Timothy J. Thompson, P.G.

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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:

- Carol Delgado