

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 WATER CASES

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

24 Plaintiff,

25 v.

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

28 Defendants.

Judicial Council Coordination
Proceeding No. 4408

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

Case No.: BC391869

**RICHARD WOOD'S REQUEST FOR
ORDER APPROVING SUMMARY
CLASS NOTICE FOR PUBLICATION**

Date: July 24, 2009
Time: 1:30 p.m.
Dept.: 1

1 Plaintiff Richard Wood requests that the Court approve the form of the summary
2 class action notice, attached as Exhibit 1, for publication in various newspapers per the
3 Court's prior orders.

4 Plaintiff has met and conferred extensively with lead counsel for the water
5 suppliers and agreement has been reached as to everything but the cutoff date cited in the
6 second paragraph. Plaintiff believes this cutoff date should be no less than 60 days after
7 the end of the two week publication period. The public water suppliers contend that the
8 date should be September 9, 2009, consistent with the date included in the long-form
9 notice mailed to putative class. At this point, that would mean at most a 30 day period
10 for putative class members to respond. This is far too short a time period given the
11 importance of the issues.

12 DATED: July 21, 2009

LAW OFFICES OF MICHAEL D. McLACHLAN
LAW OFFICE OF DANIEL M. O'LEARY

13
14
15
16 By: _____ //s//

Michael D. McLachlan
Attorneys for Plaintiff

PROOF OF SERVICE

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 July 21, 2009, I caused the foregoing document(s) described as **RICHARD WOOD'S REQUEST FOR ORDER APPROVING SUMMARY CLASS NOTICE FOR PUBLICATION**

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: www.scefiling.org 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.

//s//
Carol Delgado