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

Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

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

Case No.: BC 391869

Plaintiff,

**DECLARATION OF MICHAEL D.
MCLACHLAN IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT**

v.

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

Date: May 24, 2011
Time: 9:00 a.m.
Dept: 316

Defendants.

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1. 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.

3. This action has been litigated vigorously on behalf of the Class for three years. There has been extensive discovery, depositions, trial testimony, and class counsel have reviewed thousands of pages of evidence, deposition transcripts, and expert witness reports, in addition to conducting extensive legal research and analysis regarding all of the relevant legal claims of the Class and the Settling Defendants.

5. No attorneys' fees or costs were agreed upon and those issues had no bearing whatsoever on the relief for the Class.

7. Attached as Exhibit G is a true and correct copy of the proposed notice to the class.

8. Attached as Exhibit H is a true and correct copy of the proposed summary notice to the class, to be published in local newspapers as set forth in the Settlement Agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2nd day of May, 2011, at Los Angeles, California.

//s//

Michael D. McLachlan

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On May 2, 2011, I caused the foregoing document(s) described as **DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT** to be served on the parties in this action, as follows:

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- Michael McLachlan