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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

**SMALL PUMPER CLASS' CASE
MANAGEMENT CONFERENCE
STATEMENT**

Date: October 12, 2011
Time: 10:00 a.m.
Room: 1515 (CCW)

1 The public water supplies and certain of the larger landowners have given the
2 Court rather favorable impressions of the prospects for a global resolution *vis a vis* the
3 ongoing settlement talks. Plaintiff Richard Wood and his counsel do not agree with this
4 assessment.

5 The public water suppliers and the 'big five' landowners have agreed amongst
6 themselves to allocate to the other all of the water they want, leaving very little of the
7 safe yield for the other smaller parties. They understand the profound disadvantage class
8 counsel has been placed in by the lack of any reliable assessment of the class' water use,
9 and have elected to take advantage of that. These parties propose the class accept in
10 settlement less water than the water suppliers' own experts testified the class uses for
11 domestic purposes.

12
13 DATED: October 5, 2011

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

14
15
16 By: _____ //s//

17 Michael D. McLachlan
18 Attorneys for Plaintiff
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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18
3 and am not a party to the within action. My business address is 10490 Santa Monica Blvd., Los
4 Angeles, California 90025.

5 On October 5, 2011, I caused the foregoing document(s) described as **SMALL PUMPER**
6 **CLASS' CASE MANAGEMENT CONFERENCE STATEMENT**
7 to be served on the parties in this action, as follows:

8 (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa
9 Clara County Superior Court website: www.scefiling.org regarding the Antelope Valley
10 Groundwater matter.

11 () (BY U.S. MAIL) I am readily familiar with the firm's practice of collection and
12 processing of documents for mailing. Under that practice, the above-referenced
13 document(s) were placed in sealed envelope(s) addressed to the parties as noted above,
14 with postage thereon fully prepaid and deposited such envelope(s) with the United States
15 Postal Service on the same date at Los Angeles, California, addressed to:

16 () (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other
17 overnight delivery service, for delivery on the next business day. Each copy was
18 enclosed in an envelope or package designed by the express service carrier; deposited in a
19 facility regularly maintained by the express service carrier or delivered to a courier or
20 driver authorized to receive documents on its behalf; with delivery fees paid or provided
21 for; addressed as shown on the accompanying service list.

22 () (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of
23 facsimile transmission of documents. It is transmitted to the recipient on the same day in
24 the ordinary course of business.

25 (X) (STATE) I declare under penalty of perjury under the laws of the State of California that
26 the above is true and correct.

27 () (FEDERAL) I declare under penalty of perjury under the laws of the United States of
28 America that the foregoing is true and correct.

29 _____
30 //s//
31 Ana Horga