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Attorneys for Plaintiff

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER
CASES

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

Plaintiff,

v.

LOS ANGELES COUNTY
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

**RICHARD WOOD'S
SUPPLEMENTAL BRIEF ON
ALLOCATION OF COURT-
APPOINTED EXPERT WITNESS
FEES**

Date: November 9, 2012
Time: 9:00 a.m.
Dept.: 1

At the October 5, 2012 hearing on Plaintiff Richard Wood's ("Plaintiff") Motion for an Order Authorizing the Court-Appointed Expert Witness Work, the Court indicated that it would grant the motion, and order that the cost of this expert be borne by all the parties, including the public water suppliers and the overlying landowners. While this may prove to be unwieldy in terms of billing and collections, Wood submits this brief to suggest a means of accomplishing that goal if the Court intends to pursue such an order. Wood is filing a proposed Order concurrently with this brief.

The order should provide for a method for billing and collection of payments, and clearly identify all parties and their respective shares of the billings. If the Court does not wish to take up the task itself, Wood suggests that Class counsel be appointed to receive the expert bills and issue bills to those subject to the Court's order. Payment should be ordered made within ten days of receipt of the court-appointed expert's invoice.

The Order must be clear as to the parties affected, and should exclude the many hundreds of Doe and Roe defendants who have not appeared through counsel as that would make collection unmanageable. Plaintiff suggests that these costs be allocated on a per capita basis to the following parties, all of whom have appeared through counsel:

Party name	Attorney/Representative Contact
A. V. Materials, Inc.	Lewis, James – Taylor & Ring
A.C. Warnack, as Trustee of The A.C. Warnack Trust	Lewis, James – Taylor & Ring
A.V. United Mutual Group	Davis, Michael Duane – Gresham Savage Nolan & Tilden
AV Solar Ranch 1, LLC	Casey, Edward J. – Alston & Bird LLP
Adams Bennett Investments, LLC	Davis, Michael Duane – Gresham Savage Nolan & Tilden, a Professional Corporation
Alta Vista SunTower, LLC	McPherson, Douglas – Law Office of Douglas McPherson
Antelope Valley Country Club Improvement Company, Inc.	Clark, William – Law Offices of William Allen Clark

1	Antelope Valley East-Kern Water Agency	Brunick, William – Brunick, McElhaney & Kennedy PLC
2		
3	Antelope Valley Joint Union High School District	Hall, Daphne Borromeo – Fagen Friedman & Fulfroost, LLP
4	Antelope Valley Water Storage LLC	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
5	Arklin Brothers Enterprises	Weitkamp, John – Weitkamp & Weitkamp
6	Arklin, Philip H.	Weitkamp, John – Weitkamp & Weitkamp
7	Gene T. Bahlman	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
8		
9	William Barnes	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
10	Julie Barnes	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
11		
12	William R. Barnes & Eldora M. Barnes Family Trust of 1989	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
13	Balice, Maria	LaCilento, Michael – Law Office of Michael J. La Cilento
14	Balice, Norman	LaCilento, Michael – Law Office of Michael J. La Cilento
15		
16	Baxter Mutual Water Co.	Davis, Michael Duane – Gresham Savage Nolan & Tilden, a Professional Corporation
17	Big Rock Mutual Water Company	Lemieux, Wayne – Lemieux & O'Neill
18	Blayney, Randall	Stein, Andrew – Andrew D. Stein & Associates, Inc.
19	Bolthouse Properties, LLC.	Zimmer, Richard G. – Clifford & Brown
20	Boron Community Services District	Worth, James – MCMURTREY, HARTSOCK & WORTH
21		
22	Boruchin, as Trustee for the John and Dora Boruchin Living Trust, Dora	Aklufi, Joseph – Aklufi and Wysocki
23		
24	Boruchin, as Trustee for the John and Dora Boruchin Living Trust, John	Aklufi, Joseph – Aklufi and Wysocki
25		
26	Britton Associates, LLP	Stone, Edward – Edward H. Stone, A Law Corporation
27		
28		

1	Thomas M. Bookman	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
2		
3	Burrows, Bruce: 300 A 40 H, LLC	Herrema, Bradley – Brownstein Hyatt Farber Schreck LLP
4	Bujulian Brothers, Inc.	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
5		
6	Bushnell Enterprises, LLC	Willis, Geoffrey K. – Sheppard Mullin Richter & Hampton LLC
7	B.J. Calandri	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
8		
9	John Calandri	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
10	John Calandri as Trustee of the John and B.J. Calandri 2001 Trust	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
11		
12	Calmat Land Company	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
13	Sal Cardile	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
14		
15	Connie L. Cardile	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
16	Efren Chavez	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
17	Luz Chavez	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
18		
19	Consolidated Rock Products	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
20	Castle Ranch Estate	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
21		
22	California Water Service Company	Tootle, John – California Water Service Company
23	Cameron Properties	Melnick, Cliff – Meserve, Mumper & Hughes LLP
24	Chavez, Efren	Herrema, Bradley – Brownstein Hyatt Farber Schreck LLP
25		
26	City National Bank, Trustee	Brower, Neill – Jeffer Mangels Butler & Marmaro, LLP
27	City of Lancaster	Evertz, Douglas J. – Murphy & Evertz
28		

1		Goldsmith, Janet – Kronick, Moskovitz,
2	City of Los Angeles	Tiedemann & Girard
3		Riley, Julie C. – Los Angeles City
4	Florence Cernicky as Trustee of the	Attorney's Office
5	Cernicky Trust	Fox, Melissa – Larsen and Risley
6	City of Palmdale	Markman, James – Richards, Watson &
7	Copa De Oro Land Company, a	Gershon
8	California general partnership	Bezerra, Ryan – Bartkiewicz Kronick &
9	County Sanitation Districts Nos. 14	Shanahan, a professional corporation
10	and 20 of Los Angeles County	Sanders, Christopher – Ellison, Schneider
11	Crystal Organic Farms LLC	& Harris
12	Del Sur Ranch, LLC	Joyce, Bob – LeBeau-Thelen, LLP
13	Desert Lakes Community Services	Fife, Michael – Brownstein Hyatt Farber
14	District	Schreck LLP
15	Diamond Farming Company	Lemieux, Wayne – Lemieux & O'Neill
16	Genz Development	Joyce, Bob – LeBeau-Thelen, LLP
17	Steven Godde as Trustee of the	Fife, Michael – Brownstein Hyatt Farber
18	Forrest G. Godde Trust	Schreck LLP
19	Lawrence A. Godde	Fife, Michael – Brownstein Hyatt Farber
20	Lawrence A. Godde and Godde Trust	Schreck LLP
21	Robert Gorrindo	Fife, Michael – Brownstein Hyatt Farber
22	Phillip Gorrindo	Schreck LLP
23	Gorrindo Family Trust	Fife, Michael – Brownstein Hyatt Farber
24	Laura Griffin	Schreck LLP
25		Fife, Michael – Brownstein Hyatt Farber
26	Golden Sands Mobile Home Park	Schreck LLP
27	Gaskell SunTower, LLC	Davis, Michael Duane – Gresham Savage
28		Nolan & Tilden, a Professional
		Corporation
		Casey, Edward J. – Alston & Bird LLP

Granite Construction Company	Kuhs, Robert – Kuhs & Parker
Grimmway Enterprises, Inc.	Joyce, Bob – LeBeau-Thelen, LLP
H&N Development Co. West, Inc.	Hughes, Joseph – Klein, DeNatale, Goldner, Cooper, Rosenlieb & Kimball, LLP
Harris, Steven	Stone, Edward – Edward H. Stone, A Law Corporation
Healy Enterprises, Inc.	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Healy Farms	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Herrmann, David	Peffer, Ray – Greenan Peffer Sallander & Lally LLP
High Desert Investments, LLC	Brunton, Daniel – Latham & Watkins LLP
Holliday Rock Co., Inc.	Lewis, James – Taylor & Ring
Huth, Clinto	Hewitt, Stephen – HEWITT & TRUSZKOWSKI
Habod Javadi	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Juniper Hills Water Group	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Eugene V. Kindig	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Beverly A. Kindig	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Paul S. Kindig	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Sharon R. Kindig	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Kootenai Properties, Inc.	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Gailen Kyle	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Gailen Kyle as Trustee of the Kyle Trust	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
James W. Kyle	Fife, Michael – Brownstein Hyatt Farber Schreck LLP

James W. Kyle as Trustee of the Kyle Family Trust	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
James W. Kyle as Trustee of the Kyle Family Trust	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Julia Kyle	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Wanda E. Kyle	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Little Rock Sand and Gravel, Inc.	Lewis, James – Taylor & Ring
LV Ritter Ranch LLC	Casey, Edward J. – Alston & Bird LLP
Landinv, Inc.	Chester, Theodore – Smland & Chester
Lapis Land Company, LLC	Joyce, Bob – LeBeau-Thelen, LLP
Lebata, Inc.	Keces, Matthew – Law Office of Matthew A. Keces
Leduc, Larry V.	Campbell, Clayton – The Campbell Law Firm
Leduc, Sonia S.	Campbell, Clayton – The Campbell Law Firm
Leslie Property	Graf, Allan – Carlsmith Ball
Little Baldy Mutual Water Company	Lemieux, Wayne – Lemieux & O'Neill
Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.	Lewis, James – Taylor & Ring
Littlerock Creek Irrigation District	Lemieux, Wayne – Lemieux & O'Neill
Llano Mutual Water Company	Lemieux, Wayne – Lemieux & O'Neill
Llano-Del Rio Water Company	Lemieux, Wayne – Lemieux & O'Neill
Los Angeles County Waterworks District No. 40	Dunn, Jeffrey – Best Best & Krieger, LLP
Lu, Clark C.	Chao, Lynn – Law Offices of Lynn Chao, A.P.C.
Lu, Danny C.	Chao, Lynn – Law Offices of Lynn Chao, A.P.C.

Mason, David S.	Putnam, Vernon – Avila & Putnam, Professional Law Corporation
Maritorena Living Trust	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Jose Maritorena	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Marie Maritorena	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Richard H. Miner	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Monte Vista Building Sites Inc.	Lewis, James – Taylor & Ring
Mountain Brook Ranch, LLC	Weitkamp, John – Weitkamp & Weitkamp
Barry S. Munz	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Terry A. Munz	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Kathleen M. Munz	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Murphy, Patty	Murphy, Pat – Law Offices of Pat Murphy
Eugene B. Nebeker	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
R and M Ranch, Inc.	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Richard Nelson	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Michael Nelson	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Robert Jones	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
New Anaverde, LLC	Goldman, James – Pircher, Nichols & Meeks
Nibbelink Family Trust	Lewis, James – Taylor & Ring
North Edwards Water District	Lemieux, Wayne – Lemieux & O'Neill
Northrop Grumman Corporation (Sued As Doe 534)	Casey, Edward J. – Alston & Bird LLP
Palm Ranch Irrigation District	Lemieux, Wayne – Lemieux & O'Neill
Palmdale Hills Property LLC	Casey, Edward J. – Alston & Bird LLP

1	Palmdale Water District	Bunn III, Thomas – Lagerlof, Senecal, Gosney & Kruse, LLP
2		
3	Phelan Pinon Hills Community Services District	Miliband, Wesley – Aleshire & Wynder, LLP
4	Qarmout, Elias	Rivas, Manuel – Law Offices of Manuel Rivas, Jr.
5		
6	Quartz Hill Water District	Weeks, Bradley – Charlton Weeks LLP
7	Raney, as Trustee for the Robert and Shirley Raney Living Trust , Robert D.	Aklufi, Joseph – Aklufi and Wysocki
8	Raney, as Trustee for the Robert and Shirley Raney Living Trust , Shirley B.	Aklufi, Joseph – Aklufi and Wysocki
9		
10	John Reca	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
11	Adriene Reca	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
12		
13	Edgar C. Ritter	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
14	Paula E. Ritter	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
15		
16	Paula E. Ritter, as Trustee of the Ritter Family Trust	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
17	Red Dawn SunTower, LLC	Casey, Edward J. – Alston & Bird LLP
18		
19	Rosamond Community Services District	Evertz, Douglas J. – Murphy & Evertz
20	Rosamond Ranch	Satalino, Frank – Law Offices of Frank Satalino
21		
22	SGS Antelope Valley Development LLC	Casey, Edward J. – Alston & Bird LLP
23	Sahara Nursery	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
24		
25	Mabel Selak	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
26	Jeffrey L. Siebert	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
27		
28	Nancee J. Siebert	Fife, Michael – Brownstein Hyatt Farber Schreck LLP

Saint Andrew's Abbey, Inc., Roe 623	Davis, Michael Duane – Gresham Savage Nolan & Tilden, a Professional Corporation
Service Rock Products, L.P. (originally named as Service Rock Products Corporation)	Davis, Michael Duane – Gresham Savage Nolan & Tilden, a Professional Corporation
Sheep Creek Water Company	Davis, Michael Duane – Gresham Savage Nolan & Tilden, a Professional Corporation
Sheldon R. Blum, Trustee for the Sheldon R. Blum Trust	Blum, Sheldon R. – Law Offices of Sheldon R. Blum
Shokrian, Elias	Satalino, Frank – Law Offices of Frank Satalino
Shokrian, Shirley	Satalino, Frank – Law Offices of Frank Satalino
Sierra SunTower, LLC	Casey, Edward J. – Alston & Bird LLP
Sorrento West Properties, Inc.	Martin, Brian – Pillsbury Winthrop Shaw Pittman LLP
Southern California Edison Company	Casey, Edward J. – Alston & Bird LLP
State of California	Golden-Krasner, Noah – State of California Office of the Attorney General
Santa Monica Mountains Conservancy	Golden-Krasner, Noah – State of California Office of the Attorney General
50th District Agricultural Association	Golden-Krasner, Noah – State of California Office of the Attorney General
Tejon Ranchcorp	Kuhs, Robert – Kuhs & Parker
Tierra Bonita Ranch Company	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Beverly Tobias	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Triple M Property	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
3M Property Investment Co.	Fife, Michael – Brownstein Hyatt Farber Schreck LLP

The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July 20, 2000	Lewis, James – Taylor & Ring
The George and Charlene Lane Family Trust	Lewis, James – Taylor & Ring
The Philip H. Arklin Family Trust Dated April 28, 1994	Weitkamp, John – Weitkamp & Weitkamp
The Three Arklin Limited Liability Company	Weitkamp, John – Weitkamp & Weitkamp
Tom, Jung N.	Allenby, Robert – Sullivan, Hill, Lewin, Rez & Engel
Tumbleweed SunTower, LLC	Casey, Edward J. – Alston & Bird LLP
U.S. Borax, Inc.	Sloan, William – Morrison & Foerster LLP
United States	Leininger, Lee – U.S. Department of Justice
Van Dam, Craig	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
Van Dam, Delmar D.	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
Van Dam, Gary	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
Van Dam, Gertrude J.	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
Samuel Kremen	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Vulcan Materials Co.	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Vulcan Lands Inc.	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
WAGAS Land Company LLC	Renwick, Edward – Hanna and Morton LLP
WDS California II, LLC	Kuney, Scott K. – Law Offices of Young Wooldridge LLP
White Fence Farms Mutual Water Co. Inc.	Davis, Michael Duane – Gresham Savage Nolan & Tilden, a Professional Corporation

Wm. Bolthouse Farms, Inc.	Zimmer, Richard G. – Clifford & Brown
Richard Wood	Michael D. McLachlan -- Law Offices of Michael D. McLachlan
Willow Springs Company	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Donna Wilson	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Nina Wilson	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
Ramin Zomorodi	Fife, Michael – Brownstein Hyatt Farber Schreck LLP
enXco Development Corporation (Sued as Roe 452)	Casey, Edward J. – Alston & Bird LLP

DATED: November 8, 2012

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

By: //s// Michael D. McLachlan
Michael D. McLachlan
Attorneys for Plaintiff