

## Mike McLachlan

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**From:** Mike McLachlan  
**Sent:** Monday, January 14, 2013 1:01 PM  
**To:** 'Tim Thompson'  
**Cc:** Jeff Dunn; Michael Fife (MFife@bhfs.com); Dan Oleary  
**Subject:** RE: Small pumper class information  
**Attachments:** Class member list post Exclusion analysis minus joint owners.xlsx

Mr. Thompson,

I will include the additional question noted below in the letter. I attach a version of the class member list that eliminates joint owners so that you do not end up selecting the same property twice. If you could randomly select the 400 targets of the mailing using this file, and send back a list identifying those parties we can proceed with the mailing.

It is probably appropriate if we include Richard Wood in your analysis, as he is the designated class representative, and will testify as need by without need for a subpoena. I will gather his records and transmit them shortly after we get this mailing completed.

### Mike McLachlan

Law Offices of Michael D. McLachlan, APC  
10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Office: 310-954-8270  
Fax: 310-954-8271

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**From:** Tim Thompson [mailto:timothy.thompson@cardno.com]  
**Sent:** Monday, January 14, 2013 8:31 AM  
**To:** Mike McLachlan  
**Cc:** Jeff Dunn; Michael Fife (MFife@bhfs.com); Dan Oleary  
**Subject:** RE: Small pumper class information

I would like to add the following data request to the letter to class members you are preparing:

4. Please provide the following information regarding your well pump:

- Make and model of pump
- Depth of pump
- Date of installation
- If system includes pumping into a pressure tank, please indicate the system pressure (typically in pounds per square inch or 'psi')
- If you don't have some of this information, your well driller or pump contractor may have such records. If acceptable, please provide the name of your contractor and we may contact them to obtain this information.

Timothy Thompson, P.G.

SENIOR CONSULTANT / VP - WATER RESOURCES  
CARDNO ENTRIX

**From:** Mike McLachlan [<mailto:mike@mclachlanlaw.com>]  
**Sent:** Thursday, January 10, 2013 9:44 PM  
**To:** Tim Thompson  
**Cc:** Jeff Dunn; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com)); Dan Oleary  
**Subject:** RE: Small pumper class information

I will try to get a letter drafted as in the next few days.

I take it then we do not need to inquire about the characteristics of their pumps or wells, or any associated hardware?

**Mike McLachlan**

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Los Angeles, CA 90025  
Office: 310-954-8270  
Fax: 310-954-8271

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**From:** Tim Thompson [<mailto:timothy.thompson@cardno.com>]  
**Sent:** Thursday, January 10, 2013 1:10 PM  
**To:** Mike McLachlan  
**Cc:** Jeff Dunn; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com)); Dan Oleary  
**Subject:** RE: Small pumper class information

Mr. McLachlan:

Thank you for your recent email.

- A. The following questions are suggested to include in a letter to be sent to the selected subset of class members:
1. If you have the electrical records, can they be sent to us? If there a separate electrical meter that serves the just well pump, we would only need records from that meter. If helpful, we could make copies and return the originals.
  2. If you do not have the records, would you willing to provide written authorization to allow us to obtain the records directly from Southern California Edison?
  3. In some cases, a property visit may be helpful. Would it be possible to arrange a brief visit to your property?
- B. Regarding selecting the class members for the purposes of the mailing, we will develop a 'short-list' using a randomized selection process to arrive at a subset of approximately 400 class members that would be mailed the letter, with an expectation that we would receive on the order of 100 responses.
- C. To clarify: My previous email should have stated "400 mailings" rather than "400 responses". Thanks for catching that.

**Timothy Thompson, P.G.**

SENIOR CONSULTANT / VP - WATER RESOURCES  
CARDNO ENTRIX

Phone (+1) 805-962-7679 Fax (+1) 805-963-0412 Direct (+1) 805-963-0438 Mobile (+1) 805-895-7153

Address 201 North Calle Cesar Chavez, Suite 203, Santa Barbara, CA 93103 USA

Email [timothy.thompson@cardno.com](mailto:timothy.thompson@cardno.com) Web [www.cardno.com](http://www.cardno.com) - [www.cardnoentrix.com](http://www.cardnoentrix.com)

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**From:** Mike McLachlan [<mailto:mike@mclachlanlaw.com>]

**Sent:** Tuesday, January 08, 2013 3:26 PM

**To:** Tim Thompson

**Cc:** Jeff Dunn; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com)); Dan Oleary

**Subject:** RE: Small pumper class information

Mr. Thompson,

It would helpful if you could provide a list of the information that you would like to request from the class members in my letter.

It may be more advisable if you select the class members for purposes of the mailing, rather than having the attorneys do it. I will send you a version of the class list that contains only current class members and eliminates the duplicates (i.e. half of a husband and wife combination on a given parcel). It would be appreciated if you could then send back the list we will target.

I want to clarify something on the below. Did you mean to say 400 responses, or 400 mailings? The target goal of responses is somewhat determinative of how many letters we mail initially.

For cost control purposes, I think all involved would prefer it if the sample size be sufficient to draw meaningful conclusions without being unnecessarily large.

**Mike McLachlan**

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10490 Santa Monica Boulevard

Los Angeles, CA 90025

Office: 310-954-8270

Fax: 310-954-8271

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**From:** Tim Thompson [<mailto:timothy.thompson@cardno.com>]

**Sent:** Sunday, December 30, 2012 8:06 AM

**To:** Mike McLachlan

**Cc:** Jeff Dunn; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com)); Dan Oleary

**Subject:** RE: Small pumper class information

A randomized selection approach would be appropriate, and if we are successful in obtaining on the order of 400 responses, that would likely constitute a sufficient dataset for this analysis.

I will be out of the office this coming week; returning Jan 7.

Thank you,  
Tim

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**From:** Mike McLachlan [<mailto:mike@mclachlanlaw.com>]  
**Sent:** Friday, December 28, 2012 11:46 AM  
**To:** Tim Thompson  
**Cc:** Jeff Dunn; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com)); Dan Oleary  
**Subject:** RE: Small pumper class information

While it does not per se have to be this way, the work may be a bit more robust if the class members are selected randomly for the letter.

The response rate is unknown, but let's assume about 30%. Will 400 work?

**Mike McLachlan**

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Los Angeles, CA 90025  
Office: 310-954-8270  
Fax: 310-954-8271

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**From:** Tim Thompson [<mailto:timothy.thompson@cardno.com>]  
**Sent:** Friday, December 28, 2012 10:53 AM  
**To:** Mike McLachlan  
**Cc:** Jeff Dunn; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com)); Dan Oleary  
**Subject:** Re: Small pumper class information

Last 10 yrs of water level data would be fine.

Also, I agree re need to determine a subset of class members to request electrical records. That will be an initial task for us.

Access to parcels will also be of value. We will identify a subset of the class for this too.

Thank you,  
Tim

On Dec 28, 2012, at 10:14 AM, "Mike McLachlan" <[mike@mclachlanlaw.com](mailto:mike@mclachlanlaw.com)> wrote:

With regard to water level data, are you talking about current (i.e. last ten years)?

I have electrical records for Richard Wood, and will send those along. I think we will need to select some subsection of the class and class counsel will have to send a letter asking for records if they have them, or a written authorization to subpoena them if needed.

Is there anything else you might want from the class members, such as perhaps access to some of these parcels?

## Mike McLachlan

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10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Office: 310-954-8270  
Fax: 310-954-8271

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**From:** Tim Thompson [<mailto:timothy.thompson@cardno.com>]  
**Sent:** Friday, December 28, 2012 9:09 AM  
**To:** Mike McLachlan  
**Cc:** 'Jeff Dunn'; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com))  
**Subject:** RE: Small pumper class information

Mr. McLachlan,

Thank you for sending the file with the questionnaire responses.  
This provides valuable though limited information.

I would also like to obtain the following data, some of which may have been prepared by others during previous efforts associated with this case:

- Water level data (as a database by well, as hydrographs, as contour maps, or other format)
- Electrical pumping records (perhaps some could be obtained from respondees to the questionnaire).
- Land use data (in GIS format preferable)
- Aerial imagery (also as GIS format if possible)

Some of these datasets could be obtained separately if not available from previous efforts related to the case.

Thank you,  
Tim

**Timothy Thompson, P.G.**

SENIOR CONSULTANT / VP - WATER RESOURCES  
CARDNO ENTRIX

Phone (+1) 805-962-7679 Fax (+1) 805-963-0412 Direct (+1) 805-963-0438 Mobile (+1) 805-895-7153  
Address 201 North Calle Cesar Chavez, Suite 203, Santa Barbara, CA 93103 USA  
Email [timothy.thompson@cardno.com](mailto:timothy.thompson@cardno.com) Web [www.cardno.com](http://www.cardno.com) - [www.cardnoentrix.com](http://www.cardnoentrix.com)

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**From:** Mike McLachlan [<mailto:mike@mclachlanlaw.com>]  
**Sent:** Friday, December 21, 2012 3:35 PM  
**To:** Tim Thompson  
**Cc:** 'Jeff Dunn'; Michael Fife ([MFife@bhfs.com](mailto:MFife@bhfs.com))  
**Subject:** Small pumper class information

Mr. Thompson, Per your request, I attach an Excel file listing those persons to whom we sent class notice. The class member parcels can be identified by the absence of any number in column AI, other than the zeros, which denote individuals who jointly own a parcel.

The questions we asked them in the questionnaire included with the class notice are in the first row. Some class member input the data through the website, but most mailed back paper forms. Where you see blanks, that means the class member did not send back the form.

**Mike McLachlan**

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