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Attorneys for Plaintiff Richard Wood and the Class

**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

Lead Case No. BC 325 201

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

Case No.: BC 391869

Plaintiff,

**JOINT PROPOSED MODIFICATION  
TO PHASE FOUR CASE  
MANAGEMENT ORDER  
REGARDING PROCEDURE FOR  
DEPOSITIONS**

v.

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

Date: January 16, 2013  
Time: 9:00 a.m.  
Place: Department 1 (San Jose)

Defendants.

1 Per the Court's minute order of January 11, 2013, The United States, the Antelope  
2 Valley Groundwater Agreement Association ("AGWA"), Bolthouse Properties, LLC and  
3 Wm. Bolthouse Farms, Inc., Los Angeles County Sanitation Districts 14 and 20,  
4 Antelope Valley-East Kern Water Agency ("AVEK"), and Richard Wood jointly submit  
5 this proposed Amendment to the Case Management Order regarding the procedural rules  
6 for depositions for the Phase Four trial.

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8 The substantive proposed language for the Amendment, as set forth in the attached  
9 proposed Order, is as follows:

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11 *Amount of Notice:* No deposition will be noticed on less than 5 court days' notice.

12 *Simultaneous Tracking of Depositions:* Depositions shall not be noticed in so as  
13 result in double-tracking if there is an objection filed by a party to such double-tracking  
14 on or before 5 p.m. the second court day after service of the double-tracked deposition  
15 notice.

16 *Scheduling:* Deposition scheduling will be coordinated through the liason  
17 committee, which will designate two members as the primary points of contact for  
18 scheduling. The noticing party for any deposition will notify the case manager at the  
19 court reporting agency selected by the litigants (Veritext) by electronic mail of any  
20 notices issued or changes to deposition dates or times within four hours of posting any  
21 deposition notice. The assigned case manager at Veritext is Shay Tyler, who can be  
22 reached at [styler@veritext.com](mailto:styler@veritext.com), or 213-623-5005.

23 *Location:* All depositions will occur in Los Angeles County, unless Veritext can  
24 confirm a video link and the deposition exhibits can be made available to all interested  
25 parties at least 24 hours before the start of the deposition.

26 *Scope of Depositions:* The depositions will be limited to those matters reasonably  
27 related to the scope of the Phase Four trial and the evidence anticipated to be proffered by  
28 the party producing the witness in question.

1           *One Deposition Rule:* The Phase Four depositions do not limit any party's ability  
2 to take depositions in later phases of trial.

3           *Transcripts for trial:* The party taking any deposition shall ensure that the  
4 transcript for that deposition is produced by the court reporter at least five court days  
5 prior to the commencement of trial.

6  
7 DATED: January 15, 2013

LAW OFFICES OF MICHAEL D. McLACHLAN  
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10 By: //s// Michael D. McLachlan  
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12 Attorneys for Plaintiff  
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