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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.: BC391869

**RICHARD WOOD'S *EX PARTE*  
APPLICATION FOR ORDER TO  
SHOW CAUSE REGARDING  
IMPOSITION OF SANCTIONS FOR  
VIOLATION OF COURT ORDER RE  
PAYMENT OF COURT-APPOINTED  
EXPERT FEES**

Date: June 27, 2013

Time: 9:00 a.m.

Place: Telephonic hearing

1 Richard Wood requests an order to show cause for the imposition of sanctions  
2 against various water supplier defendants for failure to pay the Court-appointed expert  
3 bills in accordance with this Court's Order of December 11, 2012. This Order requires  
4 ten water suppliers to each pay the Court-appointed expert bills in equal amounts within  
5 15 days of receiving such bills. (Exhibit A, 2:20-3:2.)

6 On June 5, 2013, class counsel tendered two invoices to water suppliers by e-mail  
7 and by service through the Court's website (Docket No. 6886). The share of these bills  
8 owed by each water supplier is \$711.36. Such amount was due to be paid by June 20,  
9 2013.

10 As of June 25, 2013, six of the ten water suppliers have paid their share: Phelan  
11 Pinion Hills; Littlerock Creek Irrigation District; Palm Ranch Irrigation District; North  
12 Edwards Water District; Desert Lake CSD; and Palmdale Water District. The following  
13 water suppliers have not paid their bills: Waterworks District 40; Rosamond CSD;  
14 Quartz Hill Water District; California Water Service Company.

15 Plaintiff requests an appropriate sanction to compel timely payment so as to ensure  
16 the Court-appointed expert work will continue. The imposition of a daily monetary  
17 penalty may be the best option to ensure compliance with the Court's earlier Order.

18  
19 DATED: June 25, 2013

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LAW OFFICE OF DANIEL M. O'LEARY

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22 By: \_\_\_\_\_  
23 Michael D. McLachlan  
24 Attorneys for Plaintiff  
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