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15 Attorneys for Plaintiff

16 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
17 **COUNTY OF LOS ANGELES**

18 Coordination Proceeding Special Title (Rule
19 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.: BC391869

**STATUS REPORT ON COURT-
APPOINTED EXPERT WORK**

Date: September 6, 2013

Time: 10:00 a.m.

Place: Room 222

111 North Hill Street,
Los Angeles, California

1 Plaintiff Richard Wood submits the following status report regarding the work of
2 the Court-appointed expert, Timothy Thompson.

3 Earlier this year, Mr. Thompson had requested that class counsel obtain 100
4 volunteers for the assessment of Small Pumper Class water use. As of September 4,
5 2013, there are slightly more than 100 class member parcels committed to participate in
6 the survey. Mr. Thompson has informed counsel that he has conducted interviews with
7 class members associated with a 72 parcels. There are approximately 41 other class
8 members remaining to be interviewed.

9 In addition, for nearly all of the participants, the survey requires the production of
10 records. Most frequently, these records are Southern California Edison electricity billing
11 records for the years of 2011 and 2012. In some cases, counsel or class members have
12 also had to seek information about the specifications of their groundwater pumps from
13 third-party well contractors.

14 At this point, the gathering of these records is likely the most substantial hurdle to
15 completing the project. To expedite that process, Class counsel will seek an order from
16 the Court directing Southern California Edison to provide the remaining electrical
17 records.

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19 DATED: September 5, 2013

LAW OFFICES OF MICHAEL D. McLACHLAN
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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