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Attorneys for Plaintiff and the Class

**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

(Honorable Jack Komar)

Case No.: BC 391869

**DECLARATION OF MICHAEL D.
MCLACHLAN IN SUPPORT OF
MOTION FOR APPROVAL OF
AWARD OF ATTORNEY FEES AND
COSTS**

Date: December 11, 2013
Time: 9:00 a.m.
Dept: Santa Clara Superior Court, Dept 1

1 **DECLARATION OF MICHAEL D. MCLACHLAN**

2 I, Michael D. McLachlan, declare:

3 1. I make this declaration of my own personal knowledge, except where stated
4 on information and belief, and if called to testify in Court on these matters, I could do so
5 competently.

6 2. I am co-counsel of record of record for Plaintiff Richard Wood and the
7 Class, and am duly licensed to practice law in California. I make this declaration in
8 support of the Motion for Approval of Award of Attorney Fees and Costs.

9 **BACKGROUND**

10 3. I graduated with honors from the University of California at Berkeley in
11 1990. I graduated from the University of Southern California School of Law in 1995,
12 where I was a member of the University of Southern California Law Review.

13 4. During my nineteen-year career, I have specialized in complex civil
14 litigation and consumer-related matters, including class actions, as an associate at
15 Greenberg, Glusker, Fields, Claman & Machtinger and The Kick Law Firm, both
16 located in Los Angeles, California.

17 5. Since opening my own firm over ten years ago, I have continued to focus
18 nearly all of my efforts on complex litigation in state and federal courts, a majority of
19 which has been class action litigation.

20 6. I have been appointed as lead class counsel on many occasions, and a have
21 tried, arbitrated, and argued class action cases on appeal in state and federal courts
22 throughout California and in other states across nation.

23 7. I also have extensive experience litigating complex cases involving
24 groundwater, having worked on all but one Superfund case filed in Los Angeles County
25 over the past twenty years, as well as the Love Canal case while working for the U.S.
26 EPA in Washington D.C. prior to law school. While I do not have a degree in
27 hydrogeology, I have substantial experience in the field over many years of time
28 working with hydrogeologists and hydrologists in a variety of contexts. I have taught a

1 'groundwater for lawyers' class on several occasions, and have published papers on
2 matter impacting groundwater.

3 **WORK PERFORMED**

4 8. This action has been litigated vigorously on behalf of the Class for nearly
5 six years. There has been extensive discovery, depositions, trial testimony, and class
6 counsel have reviewed thousands of pages of evidence, deposition transcripts, and expert
7 witness reports, in addition to conducting extensive legal research and analysis regarding
8 all of the relevant legal claims of the Class and the Settling Defendants.

9 9. Since the Court is familiar with much of my work on this matter, I will not
10 summarize it in detail. The nature of that in detail can be readily ascertained from the
11 140 pages of my legal bills I attach hereto as Exhibit 2.

12 10. I have worked on this matter now for over six years, and conducted a wide
13 array of tasks necessary to ligate the case through three phase of trial (Phase 1 predated
14 me). I first started working on this matter in 2007, and conducted some preliminary
15 analysis at that time regarding the viability of the case, but did not start work in earnest
16 until 2008. I believe Mr. O'Leary and I have represented the class with appropriate vigor
17 and in the highest standards of practice possible under the rather unique situation
18 presented by this case.

19 11. The amount of work performed on this case is extensive. Since my initial
20 involvement in the case, there have been approximately 6,700 documents filed with the
21 Court. According to the Court website statistics, I have filed approximately 225 of those
22 docket entries. I have sent and received over 14,196 emails on this matter. If asked, I
23 would say my most significant contributions have been in leading and driving settlement
24 discussions, mostly on a global level. I have been integrally involved in those efforts
25 since the spring of 2008 and continue to work weekly on the ongoing global settlement
26 efforts.

1 **STIPULATED FEE AND COST ARRANGEMENT**

2 12. Upon completion of the terms of the final Settlement Agreement now
3 before the Court, the Defendants made it known that they strongly preferred to negotiate
4 a fixed deal with class counsel so as to limit their exposure to legal fees. Although it
5 meant likely foregoing a good deal of hard-earned money, I and my co-counsel felt that
6 the interests of the Class in this unique circumstance favored our giving a discount to the
7 Settling Defendants. I was crystal clear with them, as I was with the non-settling
8 defendants, and each of them, that this was a one-time only discount uniquely applicable
9 to this Settlement. Obviously, a number of the defendants have opted to continue to fight
10 to take the Class members' water rights.

11 13. The fee stipulation was negotiated on the evening of October 6, 2013, and
12 as of that time, I had worked approximately 3,326.6 hours and had 389.8 paralegal hours
13 into the case.¹ Mr. O'Leary had 409.4 attorney hours and 87.5 paralegal hours at that
14 time. The total attorney time was thus 3,736.2 hours, with an estimated 477.3 hours of
15 paralegal time. I also have nearly thirty hours of attorney time related to this Settlement
16 that were incurred after the above calculations. Per the negotiations below, the amount
17 of thirty hours was included in the total hours after the allocation of the fees and costs.

18 14. As of October 6, 2013, my office had \$44,465 in case costs, and Mr.
19 O'Leary had \$5,412, for a total of \$49,877. These costs, as well as the numbers below,
20 do not include the costs of class notice associated with this settlement, as those costs have
21

22 _____
23 ¹ These numbers were not exact as I was required to some estimating on recent
24 time. The fee bills submitted with this motion total 3,350.3 hours but run through October
25 23, 2013 – the date the Settlement Agreement became fully executed. I did not calculate
26 the paralegal hours correctly in August, and slightly under-reported those, which actually
27 total 544 hours between my paralegal hours and Mr. O'Leary's (all of which appear on
28 my fee bills). These numbers do not reflect all of the work I have performed on this case,
as I estimate that I have not recorded at least 200 phone calls over the six years, due
largely to the busy pace of my practice and of this case.

yet to be invoiced. However, the Settling Defendants have agreed to pay those costs in their entirety on the same formula used to determine this settlement.

15. The stipulated attorney fees and costs per defendant are as follows:

<u>Defendant</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
Palmdale Water District	\$576,798.94	\$13,651.46	\$590,450.40
Phelan Piñon Hills CSD	\$35,193.80	\$832.95	\$36,026.75
Rosamond CSD	\$107,899.55	\$2,553.73	\$110,453.28
TOTAL	\$719,892.29	\$17,038.14	\$736,930.43

16. The negotiated 'discount' turned on two components: (1) class counsels' agreement not to seek a loadstar multiplier; and (2) a reduced hourly rate of \$550 per hour for attorney time, and \$110 per hour for paralegal time. The individual allocation formula was based on the same formula used in the Willis Settlement, which turned on relative groundwater production numbers of the ten defendant water suppliers. The percentages for these defendants are: (1) Palmdale Water District, 27.37%; (2) Phelan Piñon Hills CSD, 1.67%; and (3) Rosamond CSD, 5.12%.

THE LEGAL FEES AMOUNTS NEGOTIATED ARE REASONABLE

17. I do a limited amount of hourly work in my practice, but when I do, my standard (non-family/friends) rates are over \$600 per hour, rates below those billed in Los Angeles by attorneys with similar experience and qualifications.

18. One of the more sensible and popular methods employed by Courts in assessing an appropriate hourly rate is the Laffey Fee Matrix, which is frequently used in Federal Court's across the County, as well as by California Superior Courts. A true and correct copy of this Matrix, which is publicly available at www.laffeymatrix.com, is attached as Exhibit 3. The Matrix presently lists an hourly rate of \$640 per hour for attorneys with 11 to 19 years of experience, and a paralegal rate of \$175 per hour.

1 19. The Court may wish to consider the reasonableness of the total fee in light
2 of the lack of a lodestar multiplier request. As to the potential for a multiplier, which is
3 of limited relevance given the stipulation to the very reasonable hour rate, I will not full
4 detail go through the relevant facts. In general, however, the period of six years, the risks
5 of loss and uncertainty, high quality of the work and outcome, as well as the great
6 personal and financial toll this case has taken me all weigh in favor of a very high
7 multiplier.

8 20. During the six-month window of time immediately before and during the
9 Phase 3 trial, I worked 596.3 hours on this matter. This level of work made it extremely
10 difficult to work on other matters, including legal matters. The protracted trial timeframe
11 – spanning over three months – caused me to have to surrender one matter set for trial
12 then, and to forgo taking on the trial of another substantial matter, but of which were
13 successfully litigate contingent matters. On those matters, I lost approximately \$370,000
14 in legal fees. I also had to decline the opportunity to substitute into one hourly matter.

15 21. The great draw on my time this case caused, as well as the lack of income
16 flowing from that work, created an extreme financial hardship on my practice and on me
17 personally. I borrowed sums in excess of six-figures, and worked constantly for the last
18 three years to make ends meet and keep my practice afloat. This financial hardship lead
19 directly to my losing my long-time home in 2012, and I remain a renter today. I have
20 never experience a period of financial hardship like this in my life, and it took a profound
21 toll on me personally, on my wife, and on my marriage. For me to state that I have
22 earned every dime of the stipulated and discounted legal fees would be a serious
23 understatement in my opinion.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed this 17th day of November, 2013, at Los Angeles,
26 California.

27 

28 Michael D. McLachlan

Exhibit 2

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: October 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/1: Review US motion to stay and conf with DOL re same .1; call from class member P Lennox on survey and lawsuit issues .4; meetin with S Reed re handling deposition deals for phase 5 and 6 .6; call from S Brown re survey and lawsuit .3; review Phelan trial filing .1; call with Evertz re settlement and memo to DO re same .5; call to CM Doucette .3; call from CM Suarez re survey and lawsuit .6; update master survey memo .3;	3.2	
10/2: Phone call with CM G Gregory re survey .2; conf with DO re handling settlement issues .2; review Doucette data .2; email to BB .1; legal research on domestic use issue .8; long email to DE re settlement and domestic use issue .5;	2.0	
10/2: Phone calls to 38 small pumper survey volunteers reminding about records and instructions on dealing with SCE issues 4.8; prepare summary memo re same .5; supp class member files with records and check master memo and spreadsheet re status and notes 1.4	0	6.7
10/3: Phone call with DE re settlement conf with DO re same .4; emails to and from R Walker re schedule .1; emails from DE .1, and conf with DO .1; call with R Walker re hearing issues .2; call with DE re settlement timing and issues, email to DO .3; emails to and from DE re numbers on settlement .1; review prior filing of settling Ds to confirm production numbers .4; emails to and from KL re confidentiality, conf with DO re handling same .3; review and markup of revised settlement agreement 1.4; prepare proposed judgment .4; phone call with CM Brown re lawsuit and survey .5; emails to client re settlement .2;	4.5	

<p>10/4: Emails with Bellanca re data .1; emails to and from TT re missing info, and analysis re same .4; settlement call with PWS counsel 3.0; email to RW re ex parte hearing Tuesday .2; call with CM B Moore re property issues and survey, review his records .4; email to Walker re ex parte .1; revision and editing of settlement agreement 2.3; three emails to PWS counsel re settlement .2; email to Bunn et al re handling County, revise same .3; call to CAA re class notice estimate .3; call to Rust re same .2; review US discovery .1; review and analysis numbers requested by Weeks per Willis and email to D counsel .4; long email to client on settlement update and status .5; emails to DO re settlement allocation issues .3; emails from Bunn and Evertz .1; detailed review and revision of settlement agreement 3.1; email to D counsel re same .1; email to client re further changes to terms .1; prepare BBK version of settlement and email to Bunn re handling same .5; further modification to settlement agreement, email to counsel re same .4;</p>	<p>13.1</p>	
<p>10/5: Emails with JT and DE .2; calls with DE and DO re settlement issues .5; review settlement agreement and input further DE changes .9; review Bunn email to D40 .1; emails to and from DE and TB re settlement issues .2; commence preparation of proposed class notice 1.1; emails to and from class administrator re plan and costs .4; emails to and from RWalker and call from same re settlement hearing .2; ten emails to A Horn re class notice cost estimate .7; emails to DO re billing .1; further revision and editing of settlement agreement and email with D counsel .8</p>	<p>5.2</p>	
<p>10/6: Long call with client re settlement agreement 1.1; further changes to agreement and email to counsel .3; emails to and from counsel re handling of ex parte .4; complete draft of class notice 3.3; emails to and from DE .2; attention to fees and costs analysis .8; legal research on good faith issue with fees 1.6; emails to vendors re cost issues .2; prepare settlement matrix .8; emails to and from Horn re notice .2; long email to defense counsel re settlement terms, revise same .7; email to DE re further numbers .2; 3 more emails with DE and TB re fees and costs .2; call with DE and memo to file re same .4; revise fee matrix and email to all counsel re same .6; review client signature and email re same .1; review comments from counsel and prepare revised version of settlement .4; revise class notice and email re same .1; attention to determining fees and costs, and long email to D counsel re proposal for resolving same by stip 2.3; further emails to DE re fees .3; email to D counsel re confidentiality .1; review Bunn changes and prepare new base agreements and notice .5;</p>	<p>14.8</p>	

<p>10/7: Email to KL re settlement .1; prepare and revise ex parte application OST 1.2; many emails with counsel re from and handling of same .5; email to KL re settlement .1; prepare proposed order on motion for preliminary approval .7; call with Bunn and DE re settlement, and revise same .2; emails with WM re approval .2; further revision to settlement agreement and emails re same .3; emails to and from R Walker .1; emails to Orr and other counsel on changes .1; review and revise class notice .2; prepare short form notice .5; emails to and from BW re approval .1; prepare motion for approval 3.3; emails to and from KL re his clients and settlement, and conf with DO re same .6; prepare allocation for these four Ds .4; emails to and from Tootle .2; revise judgment .3; 10+ emails re various settlement issues .3; call from CM Brown .2; further revise judgment and emails with Bunn re same .3; revise and finalize settlement agreement .8; prepare MDM declaration .6; review all papers for filing .7; further emails with KL, memo to file .2;</p>	<p>12.1</p>	
<p>10/8: Email to KL re settlement .1; review defense emails and email to same re signatures .2; prepare declaration for fees and costs .5; email to DO re same .1; emails to and from DE re settlement .1; participate in ex parte hearing and conf with DO re handling .3; long email to PWS counsel re further handling of settlement and info needed .5; analysis of B Moore material from Wildermuth and emails to TT and Moore .3; emails to and from DE and TB re D40 adverse position .1; call with class member M Guzman re lawsuit and survey .5; long email to settling counsel re class settlement procedure .4; review MO and prepare proposed order .3; email to Rwalker .1; email to DE and TB re global .1; email to DO re handling same .1; call from DE re fees, attention to declarations, pull case authority, and email to same .4; review and analysis of class member documents received this week, and 3 emails to TT re same .4; review KL email and email to TB and DE re same .1; emails to and from KL and DO re settlement .2; update master expert survey memo .3; review motion to stay .2; email to DO re same .1; emails to and from RGK re CMO changes .1; emails to and from KL re settlement .1; email to RWalker re motion to stay and add on .1;</p>	<p>5.7</p>	
<p>10/9: Emails to and from WW .1; emails to and from DE re settlement .1; call with DE re settlement issues and memo to file .5; call with TB re same .1; long email to settling counsel re D40 problems, conf with DO and revise same .8; review comments to draft CMO and revise same .7; emails with WW re stay n/c; email to DE re hearing conflict .1; email to LO counsel re further handling and questions re CMO .2; email to SC re D40 plan .1; email to and from DE re D40 plan .3; emails to and from BW re settlement .3; draft long settlement letter to WW, conf with DO re same, and revise same 1.5; review of prior correspondence and long email to KL re settlement .6; review Brown data and photos, update summary memo, and email to TT re same .3; email to client on status .2; review WW email and several further emails to and from him and counsel .4; email to client and DO re hearing .2;</p>	<p>6.5</p>	

10/10: Emails to and from DE re settlement .1; draft and revise long email to WW re settlement .9; email to DO re KL .1; emails to and from RGK .1; emails to and from AR re hearing .2; emails to and from class member P Murphy .1; emails with Bunn .1; review markup of CMO and modify same .7; prepare opp to US motion to stay and notice of lodging .6; email to LO counsel re same .1; call from CM Moore .2; email to Walker re stay motion .2; emails to and from client .3; many emails (30+) with D counsel re settlement issues .9; further WW email .1; call to same, and email to D counsel .1;	4.8	
10/11: Call from DE .1; email from Wellen ad return emails to DO and D counsel .2; emails with DE re signatures .1; call from atty Avila .1; call from J Belcher re filing issues .2; 20 emails re settlement approval .3;	1.0	
10/12: Email and call from CM Sloney re lawsuit and survey, update master memo .4;	.4	
10/13: Email to TT re Brown records .1; long email to TT re wait list folks .4; review new CM records, update master memo on survey .4; three emails to TT re survey .2;	1.1	
10/15: Call with class members Moore and Hogan re survey and lawsuit issues .6; call with Craig Stewart for Cook Bros re lawsuit and survey .5; review AVEK discovery .2; email to Walker re hearings .1; emails to and from TT, check CM files .3; review opp to stay motion .1;	1.8	
10/16: Prepare for hearings on ad-on and CMO .6; travel to and attend hearings 3.5; memo to file re same .2; email to RWalker re CMO .1; emails re approval .1; emails with Bellanca .1; email to BW re QH pull out .3;	4.9	
10/17: Prepare and file notice of ruling .3; prepare proposed order re add on petition .2; email to RWalker re same .1; emails re approvals lacking .2; email to Avila re status on Putnam .1; prepare and file notice of intent .1;	1.0	
10/18: Call with Michelle and Mark Thompson re survey and lawsuit .5; emails with settling counsel .1; call and email to class member Olsen re survey and lawsuit .4; email to Weeks .1; call to Tootle and Bunn re settlement .2; prepare notice of filing .2; review and analysis re class member master memo re persons needing to be added to class list, and review class lists and property records .5; prepare notice of filing signature pages .2; prepare opt in form .3; call with J Coffman re survey and class membership .3; prepare form for her opt in .1; call with R Pike re survey and class issues .4; prepare form for Pike .1; call to W Basner re opt in property .3; email to same re motion .2; review property records and email to P Murphy re class inclusion .2; email to Hogan re ad-on issues, and review records re same .2; prepare notice of intent for Phase 5 .1; call from Tootle re settlement .2; call with RGK re settlement and litigation issues .9; memo to file and email to same .1; emails to Murphy and Guillen re class membership .1;	5.7	
10/19: Emails to and from RK .1; review King records	.2	

10/21: Calls to and from RGK re settlement .5; email to CM King re survey .1; review court orders and docket on class notice orders .4; modify judgment, approval order and class notice .6; emails to TB and DE re same and status .2; email to LO counsel re non-opp .2; emails to and from RGK .1; emails to and from DE and TB .2; revise judgment and email to same .2; review Copa response .2; review RK and Rosamond filings .1; review opps to motion for approval .4; emails to and from DO re same .2; emails with D counsel re opps .2;	3.6	
10/22: Review 6/6/11 transcript, and prepare summary of same .5; many emails with D counsel re handling opps and hearing .5; review Bellanca records, update memo, email to TT re same .1; email to DO .1; email to and from DE re handling issues in opps .4; revise settlement agreement and email re same .6;	2.2	
10/23: Prepare ex parte re SCE records 1.9; emails with Bunn re approval .1; review CMO .1; emails to and from TT re survey .3; update master survey memo .2; emails to and from Bunn and DE .1;	2.7	
TOTAL ATTORNEY HOURS	96.5	
TOTAL PARALEGAL HOURS		6.7

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: September 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/1: Further revisions to settlement agreement .8; analysis of production data and preparation of settlement grid .7; call with Devoe family re questions on lawsuit and handling their situation, class membership .7; email to Stevens re survey .1; long status email to TT .2; email to TT re Gutierrez .1; emails to TT re 11 class members .4; update master survey memo .6;	3.6	
9/2: Complete review and revision of settlement agreement and email to PWS .8; review settlement grid and email to PWS .1; call with De Leon re survey and property issues, memo to file .7; call with Prelewicz re lawsuit and survey, and other potential participants .6; call with Broffel re survey, water use, and impact of class exclusion .6; email to Stevens re survey .1; commence comprehensive memo re class member issues and survey status 2.4; email to TT re status .1; email to Dunn n/c; assessment of L John boundary issues and long email to same re survey .5; phone call from Mynear re survey and lawsuit .6	6.5	
9/3: Phone call with Tom Stevens re survey and lawsuit .6; review class member records and email to TT re same .1; phone call with Pat Connelly .4; call from Dave Hester re same .5; review Lemieux letter and conf with DO re same .1; phone call from R Large re suit and survey .5; call with T Stevens re suit and survey .3; review class member records and emails to TT re same .3; continue comprehensive survey memo .3; phone call with John Graham re suit and survey .6; call with Welsh family re suit and survey .4; phone call with J Tucker re survey, suit and property, research DB and public records to locate same .7; emails to three class members re survey issues .2; call with Dave Hester re suit and survey, property issues .5; email to TT re Hester and Stevens .1; two emails to TT re 5 class members .2; call with CM Webb re survey issues and other owner info .4	6.2	

<p>9/4: Review and analysis of John boundary issue, check public records, emails to John and Bunn re same .5; email to Gutierrez re property issues and survey .2; call from Avila re Del Sur, class status, survey, and options, memo to file .5; call from M Tucker re lawsuit and survey .4; call from S Macisaac re lawsuit and survey .5; call from Edith Hoyt re survey .3; follow up calls to several class members .2; email to TT re master survey list .1; call from M Doucette re survey and lawsuit .6; call from P Hedlund re survey status .2; call with L John and emails to and from same .4; emails to TT re class members .4; revise and update master survey memo .5; prepare ex parte re OSC on expert bills .7; call from Mary Murphey re survey and lawsuit, and email to TT re same .5; phone call from T Steele re pump records and survey issues .2; long call from I Csaki re lawsuit, survey, property, Willis class issue and fixing status in case .7; update master memo on survey .2; email to TT re Csaki .1; call from Kuhs re phase 5 and reporter .2; email to counsel on court reporting .2; phone call to T Munz .5; call with Quillen re survey and lawsuit .5; email to TT re same and survey status and handling .2; review Houchen email and check database records re same .2; review TT status email, check master memo count, and email to same .2; check file and records on Chiodo and email to TT re same and survey .2; emails to and from TT re Robert Morris .1; check public records and database on Schweizer and emails with TT re same .3; review records and notes re R Stevens, and long email to TT re same .4; emails to and from TT re Webb .1;</p>	<p>10.5</p>	
<p>9/5: Review survey memo and TT correspondence, prepare status report .9; emails to TT re same .2; call from Mike Grimes on survey and suit .3; call from Terry Munz re survey and property issues .6; call from S Brewer re same .5; email to court on 7/29 MO and review same .1; emails to and from DO re handling same .1; review docket filings of last month relevant to trial setting and other hearing issues, and prepare for hearing tomorrow 1.3; review Stip and order re expert fees and emails with DO re handling .2; review court orders and prepare objection to stip and order 1.1; call from CM B Munz .1; call with CM Fennell re survey and lawsuit .5; call to CM Enos re survey .3</p>	<p>6.3</p>	
<p>9/6: Travel to and attend trial setting conference and meeting with counsel afterward 4.1; email to liason committee re discovery .2; email to Wang and all counsel re meet and confer, phone call .2; call with David Masters re lawsuit and survey .5; review statements of claims .1; email to and from R Walker re invoices and hearing issues .2; review stip and order on expert fees .1</p>	<p>5.4</p>	
<p>9/7: Review 12 class member voicemails and supplement master memo re same .6; call with R Bryan re lawsuit and survey .3; calls to and from J Marguiles re same, and property issue with well .9; email to TT re Masters and SCE .1; call with J Coffman re survey issues and class status .2; call with S Davidson re survey and lawsuit, email to TT re her .6; call to CM Sterling re suit and survey .4; call from CM Huston re survey .3; call to CM Perkins re survey and lawsuit .4; call to CM Hill re survey issues .3; call to Damron re survey .5; update master survey memo .3;</p>	<p>4.9</p>	
<p>9/8: Emails to and from S Reed .1; emails with RZ re trial issues .1; review and analysis of survey files, update master memo, and research analysis re return mailing issues for random selection mailings 5.2; call with CM Ward re survey and lawsuit issues .4;</p>	<p>5.8</p>	

9/9: Review PdLeon fax and call with same re survey .2; review OSC, emails to and from BBK and call to D 308 re transfer .2; call from Sid Fromberg re lawsuit and survey, memo to file .9; call from class member L Levin re survey and lawsuit .4; call with Ad. Gonzalez re lawsuit, property and survey .4; call with K Wonnell re survey and lawsuit .5; review numerous class member records, and three emails to TT re 10 class members .6; emails to and from Dumin re SCE documents .1; emails with RWalker and Dunn .1; emails with RGK re discovery .1; update master memo re notes on 4 calls .2; prepare for and participate in discovery meet and confer conference 1.0; email to LC re meeting .1; call with Basner re lawsuit and survey, and multiple property issues .7; call with L Storsteen re lawsuit and survey .4; email to Guillen re pump test .1; email to Skaggs re survey status .1;	6.1	
9/10: Review and analysis of database and notice records re Basner propertites .2; call with Basner re survey and lawsuit, opt in issues .6; research on public records regarding problematic class member parcels .5; email to Basner re handling issues .2; review Marcolaise records .2; email to Rogers re status of records .1; review other client records received .2; emails to TT re supplement master survey memo .8; emails to and from DO re trial dates .1; review of 2014 trial calendar and email to Wang re same .4; email to Dunn n/c; emails to and from RZ re status .1;	3.4	
9/11: Call with T Crawford re lawsuit and survey issues .6; call from J Sulek re same .4; many emails to and from counsel on phase 5 and meet and confer .4; call to Dunn re handling .1; emails to and from RWalker re minute order issues .3; review and analysis of Weeks discovery and notes on issues to address .4; participate in meet and confer call 1.4; email to LO counsel re trial setting hearing .1; call with A. Floyd re lawsuit, property purchase, and survey .8; emails to and from L John re boundary issue .2; call to RZ re hearing .1; email to Dunn and email to TT re Crawford .1; emails to and from P Murphy .1; prepare and revise trial setting statement 1.3; review comments to statement from LO counsel .2; call with Zimmer on handling numerous phase 5 trial issues and structure of trial, memo to file .6;	7.1	
9/12: Long email to LO counsel re issues and strategy for phase 5 trial, and revise same .7; revise trial setting statement .5; email to LO counsel re revised version and comment deadline .1; phone call from Pat Murphy re add on to class, property issues and survey .5; call with Tim Coyle re survey and lawsuit issues .6; call from Matt Gormon re Jules records .1; emails to and form same review and analysis re class records of many class members, and supplement master survey memo .6; emails to TT re records .1; call to class member May Thomson on survey and lawsuit .4; review Murphy property records and email .1; call with Charles Maupin re lawsuit and survey .5; supplement master survey memo .4; review Zimmer statement .1; email with DE re settlement .2; emails to TT re class members .1; call from CM May Tong re suit and survey .4;	5.4	
9/13: Legal research on ethical issues raised by DE settlement emails and duties of class counsel in negotiation 1.2; draft email to DE re settlement framework and ethical issues, conf with DO and revise email .7; call with Zimmer re strategy and issues for hearing, memo to DO .6; prepare for trial setting hearing .3; attend trial setting hearing 1.1; prepare memo re same .2; emails to and from Rodgers re survey issues .3; calls with class member R Smith with class membership issues, lawsuit, class notice and survey .8; brief review of Add-on and conf with DO re same .1; emails to and from RK re same .1; review and analysis of Jules Marcogliese records .3;	5.7	
9/14: Emails to and from B Rogers re survey issues .1;	.1	
9/15: Emails to and from B Rogers re survey issues .1;	.1	

9/16: Review and analysis re numerous survey issues and prepare matrix re handling same .9	.9	
9/17: Call from Lester Miller re survey and lawsuit .6; emails to and from Jung re survey and call with same .5	.6	
9/18: Calls to and from Csaki re records .2; emails to and from Guillen re numerous issues on well and survey .4; research on records location with COLA .3; email to client re yield test handling .1; phone call with J Coffman re survey issues .3; phone call from J Cagigas re multiple properties, database and survey issues .6; call from class member Peggy Do re survey .3; call with CM Larson re survey .3;	2.5	
9/19: Review emails re LC and respond to same .1; analysis re Hoier .1; call with Tribuzi re survey issues .2; call with CM L Dunn re lawsuit and survey .7; update master survey memo .2;	.4	
9/20: Call with G Hogan re lawsuit, survey and property issues .6; memo to file re same .1; email to BBK re billing issues .2; brief review of 4 motions of RK and BJ .3;	1.2	
9/22: Legal research and analysis re coordination issues on CRC and statutory authority 1.6; commence preparation of opposition to Add-on Petition 1.8; emails to and from DO re add on issues .3;	3.5	
9/23: Emails to and from Hogan .1; further legal research on discovery act preemption of PRA rights 1.1; review of Ariki depo transcript for exhibit to opp .4; complete opp to Add-on Petition 2.0; emails to and from LC members and brief review of CS documents .2; emails to and from TB re L John parcel .1; email to TT re same .1; call and emails with John re further handling of parcel .3	4.3	
9/24: Call from S Brown re lawsuit and survey .6; call with Gregory re survey issues .2; review of class member records .2; review BB memo on return flows and email to LC re same .3; call with Joyce re motions and trial issues .5; call from class member Magyar re survey and suit .4; call with class member Maslanik re suit and survey .6; call with class member Hogan re survey .5; review LL schedule .1; emails to TT re class members .2; call with Reuter family re survey and lawsuit .4;	4.0	
9/25: Review and analysis and markup of draft CMOs .5; participate in liason committee call 1.0; memo to file re same .1; emails to and from Jung and Thompson re documents .1; call with Reasor re survey, email to TT re her docs .2; review of Large estimate .1; review and analysis of many class member records and many emails to TT re class member records .7; update master survey memo .3; emails to and from LO counsel re core phase 5 discovery .2;	3.2	
9/26: Review and analysis of client documents, master survey memo and calls with 5 CMs re survey .7; call with Evertz on settlement, conf with DO re same .6; call with class member C Tyler on lawsuit, survey, and handling his water issues .7; call with L West re survey .2; many emails to TT re CM records .3; call with J Kertzman re same .1; emails to and from P Lennox re survey .1; review and analysis of prior pleadings and transcripts re scope of Phase 3 and return flow issues .6; review and analysis of TT master spreadsheet and cf with our records on survey status .3; emails and calls with Bellanca re records .2;	3.8	
9/26: AH Reminder calls to 26 water survey volunteers 3.7; make new files for survey members and update existing files 3.4;	0	7.1

9/27: Emails to and from LC re draft status .2; email to LO counsel re work on CMO .2; review LL draft CMO, email to counsel .1; email to TT re Bellanca, update master memo .1; email to LO counsel re LC and CMO issues .3; call with class member P Lennox re survey and lawsuit .4; review various CMO drafts and prepare revised version 1.0; call with Sanders re CMO and email to DO .3; review of transcripts and order from Phase 3 on return flows .4; emails to and from LO counsel re handling CMO issues. 3; calls to RZ re same .1; email to Bellanca re records issues and handling .3; call from Hansen re transcript .1; call with Sanders re further revisions and LC deal, memo to file re same .3; emails with TT re Moore .1; modify and finalize proposed CMO .4; many further emails with LC re CMO .4; review Sanders further redraft .1; emails with LO counsel re handling CMO issues .2; review Dunn revisions and many further emails with LC re handling CMO .3; calls to several LO counsel re same .3; review PWS CMO .1; prepare notice of lodging re issue of return flows in Phase 3 1.2;	7.2	
9/27: AH check MM master memo against documents and files rec'd from clients 2.1	0	2.1
9/28: Call with CM Greg Hogan re opt in .2	.2	
9/30: Call from RZ .1; brief review of settlement agreement and emails to and from DE .3; phone call with class member Brown re survey and lawsuit issues .2; review of Hogan records and emails to and from same re property issues and class membership .3; review class member records .2; emails with TT re survey issues .2; review AGWA joinder and search phase 3 notes for status of expert report .5; email to LO counsel re CMO .1; call with RZ re CMO .4; review LL response to CMO .1; email to DO re settlement issues .2; emails to D counsel re settlement agreement .3;	2.9	
9/30: AH Prepare catalogue of returned survey mail and check mail merge files and database for alternate contact info 3.6		3.6
TOTAL ATTORNEY HOURS	111.8	
TOTAL PARALEGAL HOURS		12.8

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: August 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
8/1: Review revised Minute orders from phase 4 .1; emails to and from DO re add on .1	.2	
8/4: Call with Robert Morris re suit and survey .5;	.5	
8/5: Emails to and from CM Tom Stevens re survey and lawsuit.3;	.3	
8/7: Emails and calls to PWS counsel re expert bills .2; review and markup proposed CMO .4; analysis of Bellanca data summary and records .2;	.8	
8/9: Calls with F Ciodo re lawsuit, his property issues, survey, and gathering survey volunteers 1.3; call from Jim Tribizi re suit and survey .8; emails to and from KL and JT re expert bills .2; emails to and from Leon re records .1; call from CM Hernandez re suit and survey .4; email to TT re Tribuzi and update master memo .1;	2.9	
8/12: Call from Wanda Leon re survey issues .3; status email to TT , long call with Richard Skaggs .6	.9	
8/13: Call with Richard Skaggs re lawsuit, survey, Oso TC, and assistance with project 1.1; status email to TT .2; call from David Kerr re survey and lawsuit .4; update master survey memo .3; emails and call to Rogers re survey help .3; emails to and from DO re expert issues .2;	2.5	
8/14: Emails to and from Wood .1; long call with class member Houchen lawsuit, survey, and other issues 1.1; review Chiodo public notice for meeting and call to same .2; call with B Rogers re meeting and lawsuit issues .4; drafting and revision of summary memo of history of lawsuit for class members .8; prepare bullet point memos (short and long form) to class members re legal issues, expert survey, and litigation 1.5; email to class members re dissemination of same and meeting .3; call from Tom Houchen re suit and survey, email to TT re same .7;emails and calls with Birt and CM Pollack re lawsuit, property status issues .6; emails with client re meeting .1;	5.8	
8/15: Emails to and from Wood re meeting and survey.4; call with Rogers re meeting issues .3; emails to and from KL re order on expert payment .2; emails to and from Weeks re same .1; email to RWalker re hearing on billing problems .1; emails to and from DO re handling of Carno .2; emails to town council members .2; revise short form summary and email to Rogers .2; email to defense counsel re settlement .3; call with client re same .2; travel to and attend Fairmont town council meeting and meetings with various class members 5.8; review settlement correspondence from DE and WM .1;	8.1	

8/16: Calls with CM J McDonald re suit and survey .8; email to same re add'l info .2; call from B Rogers re article and survey issues .3; email to Kiodo and Rogers .2; review database re class member info .2; call from J Perkins re followup Qs after meeting .5; call to Wood .2; call with Miliband re settlement and expert .5; review of RZ jury trial brief and brief research re same .5; calls from CM Perkins and review records from same .2; email to CM King re survey project .2; email to Rogers re Oso TC .1; emails to 3 Fairmont members re survey and questions .4; email to Skaggs re help on survey .1;	4.4	
8/17: Review PWS and LO jury trial briefs, and legal research re same .6;	.6	
8/18: Review information on other town council, and calls to same .3	.3	
8/19: Call from Tootle re settlement .7; memo to file re same .1; review Hoier records emails to TT re Fairmont and followup .3; emails to and from J Werner for Zimmer .1; long email to WMilliband and revise same .4; emails and call with CM Workman re properties and lawsuit and survey .6; call with Austin re records and handling survey issues .5; emails from Cardno re billing problems .1; long call from P Hedlund re newspaper story, suit background and status, and small pumper issues .9; 8 emails to and from Hedlund with information regarding case, survey etc .7; call with Skaggs re lawsuit questions and Oso meeting .6; emails to and from same with information on survey and lawsuit for distribution .5; further emails to and from Hedlund re questions on story details .5;	6.0	
8/20: Call from Leslie West re survey and lawsuit .7; email to TT re same .1; review Lytle records and call to same re missing info .3; email to TT re same .1; call with Ron Banuk re his solar system and survey, flow meter install .4; email to TT re same .1; call from A Austin re his property, lawsuit and survey .8; call to H Maldini re lawsuit and survey .5; emails to TT re Maldini and Austin .1; call from Jeff Godde on lawsuit and survey, family issues, LO class suite, email to TT re same .7; call with Jacob Newcomer re suit and survey .6; email to Maldini with further information .2; emails to and from Skaggs re Oso meeting and planning for same .4; suppl. master survey memo .4;	5.4	
8/21: Check Godde class notes and emails with TT .1; emails to and from Weeks re payment, update memo re dame .1; many emails to CM Rogers re survey help .5;	.7	
8/22: Long call with Kerr .8; review BBK email and related documents .2; review and analysis of adjudication map, property records, class lists and prepare summary memo on Fairmont volunteers 1.2; email to TT re status .2; call from Entrix re BBK billing troubles and handling .3; emails to and from RWalker on hearing .1; emails to and from TT on same and class members .2; call with W Reasor re suit and survey .7; call with Earl Whiteside re same .5; call from D McCrae .1; emails to TT re class members .3; 3 calls from class members re lawsuit and survey .6; review new volunteer list and email to TT re same .2; prepare documents for class member meeting .8; travel to and attend meetings with class members 5.6; email to TT re billing .1; email to CM Lytle re records issues .2;	11.8	
8/23: Emails to and from KL and DL re expert billing .2; review Kerr documents and email re same .1; email to TT re billing troubles .1; review and analysis of mail merge and cross-reference against database, instructions re handling same .6; draft new letter to class members and revise same 1.1; review and revise summary memo .3; check survey mailing round 4 .5; call with Brown re lawsuit and survey .4; emails to and from DE re settlement .1;	3.4	

8/23: AH: Attention to mail merge preparation .8; attention to mailing 4 and checking addresses against public records 6.7;	0	7.5
8/24: Emails to and from McCraes re survey water issues .3; draft new fees provision and email to DO re same .5	.8	
8/25: Analysis re class status of numerous purported class member volunteers, review records, cross-reference spreadsheets, and research public record filings .9; email to CM Guillen .1; email to Devoe re class membership problem .2; email to TT re status issues .2; phone call with M Guillen re purchase and well issues .5; email to TT re same .3; call with CM Webb's son .4; email to TT re same and Skaggs .1; update master memo re survey .3;	3.0	
8/26: Revise settlement agreement and email to D counsel .5; email to BBK re billing issues .2; calls from two class members re adjudication questions and survey .6; emails to and from Guillen re water suit and survey and Edison bills .3; call from same re assisting him with his issues, and Mr. Carrle .8; conf call with Bunn and Evertz re settlement and memo to file .7; prepare long email to TB and DE, revise same .6; email re expert billing issues with County .3; review of expert bills and prepare and file notice lodging .4;	4.4	
8/27: Review BBK billing email and call to Entrix billing in Dallas .3; long call with J. Kertzman re lawsuit and survey issues .8; call with Dumin re same .7; call with George Curtis re same .6; memo to file re class member calls .4; emails to and from TT .1; email to Dumin .1; emails to and from Landsgard re Rosamond meeting .2; emails and call with P Hedlund re further article .5;	3.7	
8/28: Call with DE re settlement issues, memo to file .7; phone call from T Steele re case and survey issues .7; phone call with H France re lawsuit and survey issues .6; long call with potential class member Devoe re well issues, property purchase, lawsuit history, and survey 1.1; email from C Gutierrez and analysis re her three properties and potential status in class, pull public records .6; emails to and from same re further details and class status .4; memo to file re class member calls .5; call from Roland Valentine re lawsuit status, property info, and survey .8; review Devoe files for relevant records, and emails to TT re same .4; phone call with Judith and Roger sides re lawsuit and survey .5; call from Robbins .2; emails to and from TT re several class members .3; emails to and from TT re Landsgaard family, review public records on various properties, and databases re same .7; emails with several class members on survey issues .3; review Newcomer records and call to same re issues and handling with SCE .2; calls to Landsgaard family members .2; update master survey memo and review class member records .4;	8.6	
8/28: AH Attention to organization of class member records and creation of survey folders for each, cross check MM master memo re same 4.7	0	4.3

8/29: Review 14 class member voicemails and memo to file re same .5; call from Jeanne Gregory re lawsuit questions and survey .6; emails to and from N Clawson re survey .4; call from Fina and Martin Morel re lawsuit, property and survey .5; call with R Fennell re same .7; calls to and from Mike Ponce de Leon re survey .1; call with Diane Nelson re property history and survey .5; emails to and from C Francour re property and survey .3; emails with Weeks and Milliband .1; call with J Ward re lawsuit and survey .4; calls to and from Nye re same .2; call with Mark Thompson re same .7; call with Russ Clawson re lawsuit and survey .5; call from R Broffel .1; call with Jack Schietzer re survey and lawsuit, pumping history .6; long email to CM Guteirrez re survey and property issues .3; six emails to and from Valentine re same .4; call with Ted Schnaidt re lawsuit and survey .6; call with L Garcia re same .7; memo to file re class member discussions .5; review voicemail from 8 class members and emails to several re survey .4;	9.1	
8/29: Follow up calls to 24 class members re records for class water survey 5.8	0	5.8
8/30: Emails to and from L John re lawsuit and survey .3; review 11 class member voicemails, memo to file .4; emails to and from C Francoeur re suit, father, survey issues .5; call with CM Nelson re lawsuit and survey .5; update master survey memo re documents and phone call data .6; emails and call with T Landsgard re property issues .5; long email to defense counsel on settlement issues, conf with DO and revise same .9; call from CM Cashbaugh re survey and suit .4; email from D counsel re settlement .1; review PWD stmt of claims .1;	4.3	
8/31: Emails to and from CM Hoyt re survey and lawsuit .3; emails to and from DO re settlement issues .2;	.5	
TOTAL ATTORNEY HOURS	89	
TOTAL PARALEGAL HOURS		17.6

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: July 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/1: Long email to client re handling of survey .4; call from Classmember (CM) Wyatt re lawsuit and survey .6; call from CM Anderson re survey .2; two emails to TT re classmembers .1; research on Hoier and Gibbs properties .3; update master survey memo .2; email to client re survey .2; emails to TT re Jung and Garibay .2; check class website and emails to and from Morris re same .1; prepare new shorter form summary letter to class members for survey mailings .8; call from class member (CM) Lee re survey and lawsuit .3; emails to and from same re property issues .3; call to Gibbs re further questions .3; review KL motion re expert fees and Davis opp to add on .1; prepare letter to Strausser .5; prepare letter to Swayze .4; letter to Sosa and VM to same .3;	4.8	
7/2: Review records from 4 CMs re survey and update master memo .4; numerous emails with DO re handling of add on .2; call from classmember Conway re lawsuit and survey issues .5; call from CM Klecheski re lawsuit survey issues .4; email to TT re same .1; prepare and file notice of withdrawal re add on .2;	1.8	
7/3: Review and modify prior BBK settlement version and email to PWS re same .7; call with RK re status of various class issues .4; call from CM Nye re survey and lawsuit .3; call with CM Leon re same .2;	1.6	
7/6: Email and call with CM Lawani re survey and lawsuit .4; update master memo re same .1;	.5	
7/8: Call with CM Anderson re records issues .2; email to TT re Leon and Anderson .1; emails and call with CM King re lawsuit and survey .5; call from CM Dunn re lawsuit and survey .6;	1.4	
7/9: Emails to and from Walker re hearing .1; call from CM Banuk re survey, property issues and lawsuit .7; emails to and from classmember Bennie Moore .2; emails with Banuk re records .1; review AVEK records .3; email to TT re Banuk .1;	1.5	
7/10: Call from Cardno re billing issues .1; call with CM Bellanca .2; emails to TT re records .1; call with CM Thomas re issues with properties, lawsuit, and survey .6; review and analysis of 2012 transcripts re payment of expert fees and prepare experts of same for next hearing .7;	1.7	

7/11: Prepare notice re expert bills .2; emails to and from DE re billing .1; call from Swayze re ownership change and survey .4; update master memo re recent calls .3; emails to and from BBK and DO re payment issues .1; emails to and from Walker re reporting issues .1; emails to and from Bunn and TT re GIS data access .2; call to CM Strausser and emails with DO re same .1; review D40 add on and emails to and from DO re handling .2; review of expert bills and prepare notice of filing same .2;	1.9	
7/12: Prepare for hearing .6; tel. status hearing re add on petitions, prepare memo to file .7; review Phase 4 SoD .1; emails to and from Walker re future handling of reporters .1; call from Rosamond group re in person meeting .3	1.3	
7/15: Emails and call with CM Deckert re lawsuit and survey .5; call with Sosa re survey .2; call from CM Guillen re lawsuit and survey, property issues .6; update master survey memo .1; call to Bovee re .1;	1.5	
7/16: Call with Kuhs .7; call with Deckert re survey and lawsuit issues .7; call to Kuhs re motion issues .2; legal research on 1008 for LemiuX motion 1.0; review numerous oppositions, transcripts, and underlying record, and prepare opposition to LemiuX motion 2.4;	5.0	
7/17: Emails to and from Weeks n/c; review late filings of yesterday, numerous minute orders, and 4 filings of this day .3; travel to Rosamond to meet with CM group re survey and lawsuit 5.3;	5.6	
7/18: Call from CM Saxberg re survey and lawsuit .6; calls from two non-classmembers and research research re status .5;	1.1	
7/19: Call from Lisa Gibbs re survey and lawsuit .5; call to Olaf L, search public records re same, and email to TT re same .5; email to and from Cardno re payment issues .1; review reply on KL expert motion .1;	1.2	
7/22: Review King summary records and email to same and TT .2; review 5 filings of today .5;	.7	
7/23: Long call with Rogers re lawsuit and survey issues 1.0; calls from two landowners re survey .5; email to TT re status and further mailing .2; review and analysis of new class survey sampling and cross refer with other database and records .5; call from Cardno re potential conflict with other project .2;	2.4	
7/24: Phone call from Bellanca re survey and suit .6; phone call from Robbins re same .7; phone call to Weeks re settlement and memo to file .4; emails to and from class members on survey .3; conf with DOL re hearing .1; check public records and class database and email to TT re Rogers .2; emails to and from TT re groundwater data, and check records re same .3; prepare opt out form .3; letter to Strauser re same .3; prepare instructions for handling next mailing .3; emails to and from Bunn re conflict, memo to file .2; emails to and from CM Lytle re survey .3; email to TT re Rogers .1; calls and emails with CM King re records .2; emails to and from client re status .2; call from CM Robbins re lawsuit and survey .5; update master survey memo re recent CM contacts .4; emails to and from Lytle re records issues .2; email to TT re same .1;	5.7	
7/24: AH Research on prior class contact addresses and cross check hard files against class list for next mailing 2.2	0	2.2

7/25: Call from Lauri Lytle re lawsuit, water association, and survey .8; review Lytle records and emails to TT re same .2; emails to and from Lytle .1; review mail merge file, conf with AH, emails to and from TT re errors in same .2; emails to and from Banuk re survey .1; check new sample data file and conf with AH re handling .4; review and analysis of mail merge file and cross check with databases to fix numerous errors with same 1.4;	3.2	
7/26: Emails and call to CM Morris re survey .1; email to TT re same .1; review court notice and call to DO re same .1;	.3	
7/28: Receive and review rural TC mailing list from Chiodo and emails to and form same re survey help .6; emails to DO re handling .1;	.7	
TOTAL ATTORNEY HOURS	43.9	
TOTAL PARALEGAL HOURS		2.2

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: June 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
6/2: Review and analysis of Blum filings and Bolthouse lease and records 1.5; email to Blum .2;	1.7	
6/3: Call from Robert Jones re lawsuit and survey .6; email to Fife re same .1; review Blum letter .1; review and analysis of client records for survey 4; email to client re same .1; email to Blum .1;	1.4	
6/4: Emails to and from MF on joint clients and research in database re same .7; email to Blum re dispute .2; emails to and from client re pump records .3; email to Fife re Jones .1;	1.3	
6/5: Call from class member Streuss about lawsuit and survey .6; review and analysis of Wood records .2; review final stipulation numbers and check with trial notes .2; review Dunn letter and state filing .1; call from Cardno re billing issues .2; email to Davis re mutual issue .1; review and analysis of expert bills, prior order and prepare letter to PWS counsel, email to same .2; email to client re expert work .1;	1.7	
6/6: Email to and from RWalker re filing issue .1; call from client re settlement .4; emails to and from Cardno and Tootle .1; emails to and from Davis re mutual status .1; emails with and call to class member Jung re lawsuit and survey .5; emails to and from Garner re settlement and their interest in resolving case .1; call from class member Nye re lawsuit, survey and other issues .6;	1.9	
6/7:Email to Fife re common clients and revise same .2; emails to and from Garner n/c; review of add on petition .1; call from class member Hawkins re lawsuit and survey issues .7;	1.0	
6/10: Review prior settlement agreements and most recent terms, prepare email to Garner re same and proposed settlement .9; phone call with Garner re settlement, memo to file .4; email to TT re survey issues .1; emails to and from client re settlement moving forward with County .2; email to Fife re Nye .1; review of Jung records and call to same .3; email and call with Margo White re property and survey .3; long email to class member Wanda Leon re survey and data needed .4;	2.7	
6/11: Call from Hawkins .2; email to TT re Jung; call from B Smith re lawsuit and survey .6; prepare summary memo re class member contacts and information .6; email to TT re Hawkins .1;	1.5	

6/12: Call to class member Bovee re survey and lawsuit .6; email to TT re same .2; email to TT re Smith .1; review of Jung documents and email to TT and Jung re same .1; review email and proposed SOD from Dunn .2; emails with DO re same .2; prepare redline of SOD for Dunn .1;	1.5	
6/13: Emails to and from Cardno re billing .1; call from B Firsick re lawsuit and survey .6; call with classmember Leon re survey and lawsuit .4;	1.1	
6/14: Emails to and from Jung re pump test .1; review proposed SOD .1; review Kuhs opp to add-on .1;	.3	
6/17: Review of Bovee photos .1; review of amended SOD .1; attention to issues with class mailing and supervise same .5; review Kuney opp to add on .1; emails to and from DO re add on issues .1; review and finalize proposed order .2; email to TT re Bovee .1; emails to and from Garner and DO re settlement .1; calls to and from L&O firm re expert billing .1;	1.4	
6/17: AH Attention to further mailing, review of database for missing addresses, prepare mail merge 1.8	0	1.8
6/18: Call with WWellen re refusal to settle, memo to file .8; review mail merge for issues with addresses .3; review Brunick opp to add on .1; five emails to and from KL re expert issue .3; emails to and from Cardno re billing issues .2; email to DO re settlement blow up by Wellen and further handling strategy with partial settlement .3;	2.0	
6/19: Legal research on several settlement issues .6; email to Wellen re refusal to settle with class .1; review revised City of LA exhibits .1; call from class member Thompson re lawsuit and survey .4; emails to and from client re settlement .2;	1.4	
6/20: Review further amended SOD .1; emails to and from client re property history .1; call from CM McCrae re lawsuit and survey .6; email to TT re same and update master memo .1; prepare revised letter to class for survey .9; email to several class members and calls to same for input on content and tenor of same .4; revise and finalize letter to class .2; review and analysis of numerous class lists re errors in TT mailing list and address issues .7; email to TT re same and request for further sample .1; email to McCrae re survey .1;	3.3	
6/21: Review second amended SOD for phase 4 .1; emails to and from WW re Waterworks refusal to settle with class .1; emails to and from CM Nolan re survey and lawsuit .2; review and analysis of TT sample and cross check against master class lists for accuracy .4; email to McCrae and TT re same .1; email to RWalker re hearing and conf with DO re handling billing issues .1; review class member mailing project and spot check same against database .5;	1.5	
6/21: Further work on mailing issues with addresses, running mail merge, and attention to next mailing round 4.4	0	4.4
6/23: Review next round sampling from TT and cross reference with master class list to determine accuracy .4; return phone calls to 4 class members .7;	1.1	
6/24: AH Attention to additional class mailing for water survey 3.7	0	3.7

6/24: Emails and calls to and from CM Leon re water issues .4; email to client re same .1; email to client re help with survey outreach issues .2; emails with court re reporter issue .1; further emails with client re settlement and survey issues .2; check Cardno payment status, call to billing office, and email to TT re same .2; commence ex parte app re expert fee payments .7; attention to further class mailing, instructions re handling same .4;	2.3	
6/25: Email to TT re court hearing .1; complete ex parte app .3; emails to and from DE and TT re billing .1; email to RGK .1; email to TT re payment issues .2; emails with client re handling survey problems .3; emails to staff re handling class calls .1; call from JTootle re payment .1; call from CM Alexander re survey and lawsuit .4; call from CM Siebert survey and lawsuit issues, memo to file re same .5; email to TT re Alexander .1; review Lemiuex filing, research re same and email to same to withdraw .2; emails to and from DO re same .1; email to and from KL re expert motion .2;	2.8	
6/26: Call from client .2; emails to and from defense counsel on billing .1; call from CM Sosa re lawsuit and survey .4; review court notice and Dunn letter .1; call with John Thurston re lawsuit and survey .7; update master memo re same .1; emails to defense counsel re partial settlement .2; legal research on KL ex parte to modify order and prepare opposition to same .8; emails to and from DO re hearing issues .1; review Tejon opp to add on and objection to SOD, email to RGK .2; email from DE re settlement n/c	2.9	
6/27: Prepare for hearing .5; attend hearing and memo to file re same .6; emails to and from RGK re county records and analysis re same .3; email to Nolan re survey .1; emails and call with CM Stedman re survey and lawsuit .6; emails to and from RWalker re reporters .1; email to TT re Stedman and review KL letter .1; analysis re Cardno payment and email to same .2; emails and call with CM Brian re lawsuit and survey .5; call from CM Bellanca re survey and lawsuit .6; update master memo on survey .2; email to TT re same .1; call from CM Hoier re survey and lawsuit .4; call from CM Bellanca re same .3; call with B Martin re class status, memo to file .3; review Landsgaard letter and call to same re survey .2; review further revised SoD .1; call from CM Bailey re survey .2; email and call from CM Borja re property issues and survey, analysis re same and return call .4; call from CM Stevens re survey and lawsuit .5; update master survey memo on recent calls .2; email to client re status of suit .2; long email to Borja re survey issues .3; email to Landsgaard re survey and suit .3; email to TT re further mailing for survey .1;	7.4	
6/28: Review and analysis further TT sampling for survey .7; email to and from TT re Stevens .1; call from CM Anderson re lawsuit and survey .5; email from CM Garibay re survey .4; review court order .1;	1.8	
6/30: Review client email and call to same re survey .2;	.2	
TOTAL ATTORNEY HOURS	44.2	
TOTAL PARALEGAL HOURS		9.9

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: May 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
5/1: Emails to and from client re settlement .2; review 4 stipulations .2; review court order and discovery .2; emails to and from Cardno re billing .1; review and analysis of Bolthouse documents and witnesses .5; emails to and from LC re call .1;	1.3	
5/2: Emails to and from counsel re LC .1; review Cal Water filings .1; review changes to DL depo and update summary .1; attend LC call and memo to file re same .5;	.8	
5/2: AH Prepare summary of Taylor and Atkinson depositions, revise three prior summaries 5.4	0	5.4
5/3: Review weeks list .1; review and analysis of 15+ law and motion filings and prepare summary of same 1.3; brief legal research on return flow issues .6;	2.0	
5/4: Draft retainer agreement for LO complaint .2; prepare deposition summary for Ariki deposition and documents produced, including water supply assessments 2.7	2.9	
5/5: Emails to and from DO and client re trial issues .3; prepare cross exam for three US witnesses, review and analysis of discovery materials and documents, prior trial exhibits 3.4	3.7	
5/6: Emails to and from DO and client re trial issues .2; prepare joinder .1;	.3	
5/8: Review Tejon trial notices .2; review exhibit list .2; review Chester filings .1; review ex parte app .1; review various notices to appear at trial .1;	.7	
5/9: AH: review and analysis of default and cf with class lists, memo re same 3.7;	0	3.7
5/9: Review court order n/c; analysis of witnesses prep and depositions needing summary for trial .6; commence preparation of trial outlines for D40 and PWD 3.7;	4.3	
5/10: Review revised exhibit list .1; review and analysis of further Bolthouse exhibits .2; review AGWA depo changes .1; review MTC depo of D40 .1; emails to and from LC re trial exhibits .2; review RZ trial notices .1;	.8	

5/11: Review and analysis of depo summaries and commence trial outlines for 9 AGWA parties, Bolthouse, Borax, and Diamond parties 5.2	5.2	
5/13: Attend hearing on MILs and trial issues 4.0; review Blum trust filings .3; emails and call with client re trial and settlement issues .8;	5.1	
5/14: Review PWD MIL .1; review two court orders .1; drafting and revision of LO complaint 2.8;	3.0	
5/15: Review stip matrix .2; complete witness outlines for cross exam of PWD, D40 2.1; prepare cross for QH 1.3; prepare cross for Cal Water .7; review and analysis of remaining AGWA parties and prepare cross for 13 of those entities 3.7;	8.0	
5/16: Review LandinV filings .1; assessment re need to attend Atkinson depo and review of related docs and discovery .3;	.4	
5/17: Attend hearing and memo to file re same .7; review stipulation matrix .2;	.9	
5/20: Email to Davis .1; emails to and from Cardno re billing .1;	.2	
5/21: Emails to and from RGK re trial .1; revise LO complaint .8; emails to and from DO re same and further revisions .3; emails to and from Davis re client list .2; review Tejon RJN .2; review revised US filings and supplement memo re same .3; prepare letter to class members re survey work 1.2;	3.1	
5/22: AH Attention to class mailing, merge, review of databases and research re missing addresses 5.7	0	5.7
5/22: Review COLA MIL .2; emails to and from DO re trial issues .3; review AGWA pretrial statement .1; review trial objections .1;	.7	
5/23: Settlement email to Ds .3; prepare letter to LO counsel .6; prepare notice of related cases .3; review CMO and MO .1; review Cal Water filings .1; review numerous stips and trial filings .4; emails to and from Garner .1; review Mutual filings and prepare summary memo re 21 of them for trial 2.4; review stipulation matrix and cross reference with filings .5; prepare for MSC and hearing .8;	5.6	
5/24: Travel to and from San Jose for hearing 7.8; review and analysis of 20+ trial filings, motions and stips filed today .9; update summary memo re same .3;	9.0	
5/26: Review 3 trial briefs file in last two days .3;	.3	
5/27: Attention to trial prep, including legal research on evidence issues, and review of various declarations of witnessess for LO parties 1.3	1.3	
5/27: AH Attention to preparation of trial exhibits for cross exam of US, PWS, and landowner parties 6.4	0	6.4

5/28: Travel to and attend phase 4 trial 6.0; revise and finalize cross exam for D40, review of related exhibits and documents 2.7; review of Bolt brief, ex list and .3; review Boron trial docs .1; review Scott decl .1; review five Chester filings and prepare cross for same .8; review Borax trial filings .1; review state of CA five trial filings .3; review 4 D40 filing and trial brief, supplement exam outline .6; review Maguire filings and prepare summary re same .3; review new Davis trial docs .2; call to TT .1;	11.5	
5/29: Summary email to DO re trial .5; draft and revise proposed stipulation .7; travel to and attend Phase 4 trial 8.8; review supplemental Burrows filings .1; review AGWA filings .1; call with TT re survey and trial issues .3; review further Ariki decl .1; email and call from Bunn .1; review Leggio decl .1;	10.8	
5/30: Review 6 trial filings .2; travel to and attend Phase 4 trial 4.9;	5.1	
5/31: Emails to and from Maguire .1; email to Bunn re database .1; emails to and from S Blum .2; prepare summary memo re trial 1.2	1.6	
TOTAL ATTORNEY HOURS	88.6	
TOTAL PARALEGAL HOURS		21.20

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: April 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
4/1: Many (25+) emails to counsel re depo setting .4; review and analysis of PWD discovery and preparation of deposition notice .9; call from Bunn re depositions .1; drafting of settlement language and emails to and from Zimmer re same 1.8; review MIL filings.4; review new depo schedule and three emails re same .2; emails to and from LO counsel re depositions and trial issues .6; review depo notices filed today .1; email from TT re survey and payment .1; prepare notice of depo for D Lameroux and request for documents .3; many further emails re depo scheduling issues .3; emails with RGK re AVEK/BBK conflict issue .2;	5.4	
4/2: Review and analysis of US exhibits, prior evidence produced, and prepare summary memo re same 1.6; call from WM and review and execute stip .2; review meet and confer letters .1; emails re depo scheduling .2; emails to and from Entrix billing .1; review objection to CMO .1;	2.3	
4/3: Review RZ stip re groundwater and related records, discovery responses and settlement docs .3; review three filings on depositions .1; emails to and from LC re depositions and review calendar .2; return phone calls to 4 class members re lawsuit and survey 1.3	1.9	
4/4: Review and analysis of discovery materials to assess need to attend Dorrance depo .3; many emails re depo scheduling .3; calls to three counsel re cost sharing on depositions .3; review materials from BB re D40 depo .3;	1.2	
4/5: Further review of WW documents and discovery, prepare depo 1.8; prepare notice for Ariki depo .2; review of 5 depo notices and document demands .2; attention to calendaring issues and conf with DO .1; emails to and from STyler re depo issues .2;	2.5	
4/6: Supplement D Lameroux depo outline .5;	.5	
4/8: Prepare for Dennis L depo 2.6; travel to and take depo 3.3;	5.9	
4/8: AH Summarize Smith, Selak, Balhman, Kremen and Miner depositions 7.6	0	7.6

4/9: Review and analysis of discovery material and prior filings to evaluate need to attend depos of Jones, Healy, Koch, Utley, Trembley, Beeby and Cortner .8; emails to and from LC re depo issues .2; review depo notices .1; review Bunn stip .1; review Dunn letter and objection to Ariki depo .1; emails to and from RZ re Utley .1;	1.4	
4/10: Prepare for Koch depo .5; attend Koch deposition 4.2; emails to and from RZ re Utley .2; emails to and from RGK re depositions .2; review D40 docs from same .3;	5.4	
4/11: Prepare for Ariki D40 depo, including review of discovery and other documents 3.7; analysis re need to attend Sanden depo .2; review voluminous materials from MF re D40 depo, and revise outline re same .6; numerous emails to and from counsel re depo issues .3;	4.8	
4/12: Complete prep for Ariki depo .5; travel to and take Ariki depo 5.5; analysis re need to take Beeby depo .1; numerous (15+) emails to and from counsel re depo scheduling and issues .3;	6.4	
4/12: AH Summarize Nye, Allesso, Reca, Barnes, and Wilson Siebert and Zomorodi depositions, edit three prior summaries 6.8	0	6.8
4/13: Analysis re need to attend Nelson depo .2; review and analysis of long MO re stipulation status and check filings on same .5; return calls to and from 3 class members re survey and lawsuit 1.1	1.8	
4/15: Emails to and from TB, and review stip .2; emails to and from RZ re Ariki .2; review Fife stip and decl .1; review Borax stip, Tremblay filings, RZ response, and two DE filings .2; call from RZ re D40 depo and trial .4;	1.1	
4/16: Analysis re need to attend Yurosek and Filkins depositions, review and analysis of Bolthouse materials re same .5; review depo notices .1; call from Tyler re depo issues and handling .2; analysis re need to oppose MILs and legal research re same 1.1; calls to LO counsel re same .4;	2.3	
4/16: AH Summarize Baharloo, Healy, Jones, Kyle depositions	0	7.8
4/17: Emails to and from BW re depo issues .2; review depo notices filed today, and objections .1; review and summarize Beeby depo 2.5	2.8	
4/18: Analysis re handling groundwater survey .6; review letters from JD and RZ .1;	.7	
4/19: Review and analysis of 14 law and motion filings re MILs .9; emails to BJ and BB .1; prepare joinder .1;	1.1	
4/22: Emails to and from Tyler re handling depo issues and cost sharing .2; email to RWalker re ex parte .1; review and summarize Hendrix and Tremblay depositions 5.4	5.7	
4/22: AH Summarize depositions of Javidi, Bowcock, Sanden, and Dorrance depositions	0	8.2
4/23: Review and analysis of SReed proposal re depositions and emails to and from same .3; review Calandri dec .1; review Copa ex parte .1; review PPH filing .1; emails from BW and review Copa orders .1;	.7	
4/24: Numerous emails with LL and counsel re settlement structure .4; settlement conf call with US 1.1; prepare depo summary for Lameroux 2.3; analysis re need to attend AGWA depositions and review documents re same .3;	4.1	

4/24: AH Review and summary of Beuhler, Yurosek, Filkins and Calandri depositions 8.1	0	8.1
4/25: Emails to and from client re settlement .3; review Zimmer filings .1; assessment of reporting proposal and emails re same .1; review and summary of Leggio depo 2.9	3.4	
4/26: Review and analysis of current settlement matrix and agreement .3; emails to and from LL re settlement .1; review US supp response .1; review Van Dam notice and objections, Satalino filings 1;	.6	
4/27: Call with Wood re numerous issues 1.0; commence ex parte draft .4;	1.4	
4/28: Emails and call with client .3;	.3	
4/29: Review court docket and analysis re does and roes status, willis class list .8; complete and file ex parte application 1.9; emails to and from client and DO .1; review Joint CMC stmt of AVEK .1; emails to and from Tyler re phase 4 transcripts .2; emails to and from counsel re depos .2; review US further supp response, modify US summary re same .4; review Kuhs filings .1; review Willis opposition .1;	3.9	
4/29: AH Summarize Wagner, Cornter, Perez, and Gorrindo depos 8.9	0	8.9
4/30: Prepare for and attend telephonic status conference 1.6; email to RK re hearing .1; review Copa stip filing .1; emails to and from LC re trial exhibits .1; review 4th amended CMO and stip order .2; review and summary of Wildermuth deposition 3.1	5.2	
4/30: Summarize Maritorena, Reca, C. Van Dam, and G Van Dam depos 7.8	0	7.8
TOTAL ATTORNEY HOURS	72.8	
TOTAL PARALEGAL HOURS		55.2

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: March 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
3/1: Status conf and memo to file re same .6;	.6	
3/5: Review MO and calendar hearings .1; review proposed third A CMO .1;	.2	
3/6: Participate in General Brewer deposition 4.2; memo to file re same .3; email to R Walker re hearings .1; emails to and from Veritext re scheduling and technical issues .3; emails to and from RK re US .2;	5.1	
3/7: Call from D Hall .2;	.2	
3/8: Call with Kuhs .4; call with TBunn re depositions .2; emails to landowner counsel .2; review 3 rd A CMO .1; review Hallion materials .4; review objection and email to Weeks re 3 rd A CMO .1; emails to same re settlement .1; emails to and from RGK re PWD depo .1;	1.6	
3/11: Email and call from Entirx billing .1;	.1	
3/12: Liason committee call .5; review of Nebeker depo changes and substitutions, email to Fife .1;	.6	
3/13: Review of Nebeker depo transcript and prepare summary of same for trial 2.6; review AVEK CMC stmt .1; review and summary of Voss depo 2.1;	4.8	
3/13: AH Review and summary of Oberdorfer, Boetch, Brewer and Cummins depositions	0	5.3
3/14: Review CA ex parte and order .2; review Weeks discovery and deposition notice, CMC stmt of Copa .3; review Copa ex parte re stip and review file materials re same .2; revise Sloan settlement document and email to same .6; review RZ objections and Burrows decl .1; email from RK and email to WW re conflict .1;	1.5	
3/15: Telephonic hearing and memo to file re same .8; call with Bunn re Dennis depo and stip, memo to file .3; prepare instructions for handling first class mailing and review and numerous databases to locate missing address information and exclusion data .8; emails to DO re same .1; review numerous stipulations and email to McGuire re same .2; review Boron filings .1; review AV mutual stipulations .3; review MO and AGWA motion and stip .2; review Lewis stip .1;	2.9	
3/15 AH: Attention to locating addresses and preparing mail merge for class mailing 1.4; review and summary of Scott, Herbert, Hallion Bookman depositions 6.1	0	7.5

3/18: Prepare for Reed deposition 1.3; attend Reed depo including calls with Kuhs re handling same 4.7; call from Kuhs re various phase 4 issues, and potential injunction motion .5;	6.5	
3/19: Review and analysis of PWD P4 trial disclosures, summary expert report, and analysis re needs for deposition 3.6; call with Bunn re deposition issues and memo to file re same .6; email to LO counsel re strategy for handling same and trial issues .4; call from Bunn re PWD missing info .2; review notes on Reed testimony .2;	5.0	
3/20: Email to LO re further information on PWD depo .5; review Tejon and AGWA filings .2; prepare and revise letter to class members re expert survey and litigation status 1.4;	2.1	
3/22: Review Copa CMC statement .1; emails re depo scheduling .1; review Joyce stip papers .1; review and analysis re expert depo notices and attention to calendaring issues .6; review D40 ex parte and email to DO re same .2;	1.1	
3/22: AH: Attention to assembly and verification of class mailing on survey 3.8;	0	3.8
3/24: Review and analysis of RZ questions for PWD and email to same for clarification .6; call with Zimmer and memo to file .4; cross check class mailing and emails re issues with same .6;	1.6	
3/25: Travel to and attend hearing on stipulations and phase 4 trial, meet and confer afterward with all counsel 5.1; call from Zimmer re settlement .3; review depo notices and Zimmer letter .1;	5.5	
3/26: Emails with LC re scheduling and agenda .2; email to Fife re LC .1; emails with Bezerra and BB .2; review Leggio supp. .1; review and summary of Reed depo 3.7;	4.3	
3/27: Review revised CMO .1; liason committee call .8; emails to and from LC and counsel re depo scheduling .3; call with court and memo to file .4; review depo notices .1;	1.7	
3/28: Emails with RZ .1; call from Zimmer re settlement language .6; review 4 th CMO and email to Orr .1; review RK letter and depo notices .1;	.9	
3/29: Calls to and from Bunn and RZ re depositions .3; emails to and from counsel re depo scheduling .5; brief review and analysis of return flow MIL, review SoD and prior orders .8; emails with LO counsel re MILs .3; emails to and from Weeks and RZ .1; emails to and from LC re depo issues .1; several emails to LC and LO counsel re PWD issues .4; emails to and from TB and BW and LC re depositions .3; review new depo schedule and numerous emails to LO counsel and LC re issues .3; review US MIL and research on underlying authority, read several cases 1.1;	4.2	
3/30: Review MIL re reserved right and several underlying cases .9; review Rosamond MIL .1; review AVEK MIL .2; review WW40 MIL and RJN .4; review phase 3 ruling and email to LO counsel re RCSD motion .3; review QH MILs .2;	2.1	
TOTAL ATTORNEY HOURS	52.6	
TOTAL PARALEGAL HOURS		16.6

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: February 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
2/1: Review Lane and PWD decls .2; review and analysis of Nelson and McCulough declarations and exhibits .7; review 24 Davis mutual supp responses and attached exhibits, and supplement master memo re: trial notes 4.1;	5.0	
2/5: Review Bowcock, Lopez and Latham decls .2; review eSolar and AV Solar discovery filings and supplement master trial memo re same .7; review Reed decl and exhibits, suppl. master trial memo re same .6; review and analyze SCE decl .2; review PPH decl and exhibits, supp. memo re same .6; review Joint Union filing .1; analysis and review Wagner decl and exhibits, supp memo re same .7; review Taylor decl .1;	3.2	
2/6: Emails with LC re scheduling .1; review Palm Ranch filing .1;	.2	
2/8: Call from School District re class .1; status email to TT .1;	.2	
2/9: 2/3: Review and analysis of 4 AVEK decls and exhibits and prepare summary of key information 1.3; review Scott and Boetsch declarations and exhibits and supp memo re same .6; review 11 CA entity declarations and voluminous exhibits, summarize same 2.3; review of Foth decl and exhibits and summarize same .3; review Chisam decl and exhibits, summarize same .4;	4.9	
2/12: Prepare for and attend liason committee call .6; memo to DOL re same .1; review revised Scott decl and update memo re same .3; review Metzger and Blum decls and exhibits, supp master memo .4; emails to LC .1; email to RWalker re ex parte .1;	1.6	
2/13: Phone calls re discovery order issues, and depositions .3; prepare ex parte application, proposed order .9; review Orr letters and schedule chart .2; emails to and from RK re depos .1; emails and call with client re trial issues .4; review PPH ex parte and answer .1; emails from RZ .1;	2.1	
2/14: Review weeks letter on depos .1;	.1	
2/15: Participate in depo scheduling call 1.4; emails to and from Kuney re trial issues .2; participate in court hearing, and memo file .7; review minute order and filings of this date .1;	2.4	
2/16: Research, analysis and evaluation of prior history of Boron CSD for potential Doe amendment 1.2;	1.2	

2/19: Review Wagas supp decl. and revise master memo .3;	.3	
2/21: Emails with LC and LO counsel re depo scheduling .2; review RK depo schedule .1; emails to and from RK re depo notices .1; emails to and from RWalker re order status .1; call with Ralph re status and trial .2; review two new CMOs .1; numerous emails to and from LC and counsel re agenda items, stips and scheduling .4;	1.2	
2/22: Review and analysis of Kuhs depo notice and comments to same .4; participate in liason committee call and memo re same .8; review of US discovery response and revise master memo .6;	1.8	
2/23: Review US depo notice and objections, LL letter .2;	.2	
2/25: Call with landowners re depositions .9; prepare memo summarizing division of labor and projects .5; review Blum discovery filings .2; emails to and from Dubois .1; prepare for depositions of US witnesses 1.1; review Lewis email and decl, email to same re Warmack .2; email to DO re same .1; email to Weeks on depositions .1; many emails to and from Veritext and Weeks re depo issues .5; emails to and from Weeks and LO counsel re depo locations .1; email to Orr re stips .1;	3.9	
2/26: Attend depositions of US witnesses 5.8; emails to and from Lewis .1; review Fife ex parte and proposed order .2; review Grimway RFP, Tremblay notice and Miliband meet and confer .1; emails with LC re scheduling .1;	6.3	
2/27: Draft email to WW re AVEK and email to LO counsel re same .5; revise draft email and send to WW .2; emails to and from RK re same .1; review Brunick stip .1; many emails to and from Tyler and LC re depo issues and scheduling .5;	1.4	
2/28: Review Copa objection to US .1; call from D Hall and memo to file .2; review RK PWS depo schedule and emails to and from same re depositions and stips .3; review AVEK CMC statement .1; review Bolhouse CMC, amended version, Joyce filings, PPH objections and Copa statement .2; review Weeks, Bunn, Tejon and Fife filings .2;	1.1	
TOTAL ATTORNEY HOURS	37.1	
TOTAL PARALEGAL HOURS	0	

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: January 2013

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
1/2: Review memo and markup draft stip from Brunick re phase 4 trial .5;	.5	
1/4: Phone calls to client .2; review and analyze revised stipulations for trial .4; participate in liason comm call and memo to file re same 1.4; prepare and revise witness designations .5; emails to and from Veritext re liason comm decision and contract terms .2; review veritext contracts .2; email to all counsel re shared court reporter options .2	3.1	
1/5: Review dozens of witness designations and prepare list for depo notice priority and scheduling 1.3;	1.3	
1/7: Conf call with counsel, review and analysis of deponent list and designations 1.4; emails with LO counsel re depo issues .2; draft revised language on class to Liason Comm (LC) for stip, and email re same .4; review phase 4 depo schedule from weeks and analysis re handling and calendar issues .4	2.4	
1/8: Emails from LO counsel re deposition issues and scheduling .3; email to all counsel re group deposition pricing and management, revise same .4; review revised depo schedule and numerous further scheduling emails .5; email to TT re expert work .3; review letter re depositions, objections, and further scheduling many emails .3;	1.8	
1/9: Many (11) emails to Veritext re status of online calendar and handling of management issues .5; emails to and from Weeks and counsel re depo issues .2; review further objections .1; review Brunick memos .1; review liason comm agenda .1; prepare for Nebeker deposition, review discovery and relevant records 1.1; prepare for Voss depo, review discovery response .8	2.9	
1/10: Calls and emails with Veritext re video set up, virtual exhibit issues as well as calendaring case management .9; emails with all counsel on deposition issues .3; attend Nebeker and Voss depositions 6.2; review deposition objections and supplemental filings .3; emails to and from WW re AVEK depo .3; emails with Veritext on technical issues for depositions .2; review order on discovery conf .1; call from Kuhs .2; emails to and from Thompson (TT) re work .1; review of ex parte application and joinders .4; prepare and revise joinder re same .8;	9.8	

1/11: Review depo schedule and discovery filings, prepare for hearing to cont trial .8; attend hearing on ex parte to continue trial date, memo to file 1.3; many emails with LC re scheduling and depo issues .5; draft and revise First Amended CMO .6; email to LO counsel re First Amended CMO and discovery issues .4; review Bezerra comments and email to same .1; emails to and from RZ re trial issues .2;	3.9	
1/12: Review and analysis re voluminous discovery order responses of 14 parties and prepare summary memo re same 4.8;	4.8	
1/13: Emails re LC call .1; continue review and analysis of discovery filings of numerous parties and supplement memo re same 1.8;	1.9	
1/14: Participate in liason call re stipulations and CMO changes, memo to file 1.9; emails to and from liason counsel re suggested trial scope to CMO .4; further modification of CMO language and email to LC re filing .3; review email from TT re survey .1; review AGWA CMC stmt .1; research on in lieu pumping law .3; prepare and revise on first amend CMO draft language, email to LC re same .4; review revise class list to remove work product section .2; email to TT re survey and random sample .2; review CMC statements of Copa and AVEK .2; read Index of non-CA cases .5; review TT corr and prepare filing of same .3; review Bunn email and stip and decl draft .2;	5.1	
1/15: Draft long memo re depo procedures .5; email to LC re same .1; review Fife email and respond re LC issues .3; emails to and from Orr and Kuhs re disc issues .2; conf call re phase 4 trial issues, memo to file .7; review Kuhs comments to disc order .1; review LL email and amended trial schedule .1; call with Orr and emails to and from same and LC re order.3; prepare revised trial schedule filing and forward to LC for review .5; prepare order re phase 4 deposition procedures .7; review filings of today .2; email to LO counsel re hearing issues and strategy .4;	4.1	
1/16: Telephonic status conference with court and memo to file 1.8; emails to and from Bunn re stip .1; emails to and from Veritext re status and further handling of depo .2; email to R Walker .1; prepare and revise 1 st A CMO .6; email same to LC re same .1; emails to and from Dubois .1; modify order .3; email to RWalker re same .1; emails to and from Bunn and calls to PWS counsel re hearing .3; revise Order .2; email to RWalker re same .1; emails to counsel re return flows issue .2;	4.2	
1/17: Numerous emails with counsel re revised CMO and handling of same .3; revise CMO .2; email to RWalker re same .2; emails to counsel re status .1; call from DHall .1;	.9	
1/18: Call from DHall for school district on class membership and settlement issues, memo to file .4; emails to and from Kuney re decl .3;	.7	
1/19: Brief review Kuhs proposed PO and prior version .2; continue review of numerous discovery filings of parties and supplement memo re same 2.6;	2.8	
1/21: Email from TT and review database .2;	.2	
1/22: Call with Kuhs re many issues .9; review and analysis of PO .4; emails with LC re scheduling .1; emails with LO counsel re depositions .3;	1.7	
1/23: Emails to and from counsel re scheduling .2;	.2	
1/24: Call with RZ and RKuhs re AVEK issue and brief research on ethical issue .4;	.4	

1/25: Emails to and from TWhite court reporter.1;	.1	
1/28: Review draft hearing transcript .2; email to White re questions .2;	.4	
1/29: Emails to and from TWhite .1; emails to and from S Reed re transcripts .1;	.2	
1/30: Review Wagas declaration and emails to Renwick re changes needed to same .4; email to Bunn re stips .1; review Evertz declaration .1;	.6	
1/31: Review of 22 Fife client declarations and prepare summary memo of issues re same 1.6;	1.6	
TOTAL ATTORNEY HOURS	55.6	

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: December 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
12/3: Email to RWalker re order .1;	.1	
12/5: Review proposed CMO and markup of same .3; review expert demands .1;	.4	
12/7: Review CMC statements .2; emails with DO and client .3; email to Veritext re phase 4 .2;	.7	
12/10: Review D40 and US filings .2; emails with DO re hearing .2; emails with RK re appeal .3;	.7	
12/11: Review expert order .1;	.1	
12/13: Email to TT re status .2;	.2	
12/14: Conf call with all parties from Phase 4 issues 1.0; conf with DOL re same .2; prepare draft ex parte re phase 4 and email to Rwalker .5; conf call with liason comm re: phase 4 issues .8; email to RW re new class complaint filing .1; revise ex parte application and circulate same by email .7; emails to and from SReed re phase 4 proposals and options .5; email with Morris re same .1; prepare notice of intent and file same .1; review numerous notice filings .2; review Bezerra proposal and emails to and from same .3; call with counsel re CMO and trial issues .4;	3.9	
12/15: Emails to and from Fife and Bezerra re CMO .2;	.2	
12/17: ; Email to and from Walker re ex parte date .1; Prepare and revise amended CMO 1.0; approximately 20 emails to and from counsel re comments on CMO and ex parte and revision same 1.3; legal research on WC alt. water supplies .4; revise ex parte application .8; numerous emails to and from R. Walker .2; call with Milliband and memo re same .6; call with Kuhs and email to DOL re settlement .8; emails with RB .reCMO .1; call from School district re class and trial issues .4; edit and file ex parte and amended CMO .6; calls from two class members .5;	6.8	
12/18: Review recent notice filings and prepare summary list .3; research and analysis re public records issues .6; review and analysis of WM ex parte .2; emails with Orr and review LC filing .1;	1.2	
12/19: Call from Lewis re Warnock joining class .4; memo to file re same .1; review oppositions to ex parte .2;	.7	

12/20: Prepare for hearing .2; participate in ex parte hearing, memo to file .5; emails with Reed re pricing issues .1;	.8	
12/21: Call from School district lawyer re joining class .4; review Veritext pricing proposals for phase 4 .3; review further notice filings and supplement phase 4 list re same .3; long email to LC re same .4; review and analysis of PWD discovery filing .3; emails to and from LC .1; review and analysis of class databases and email to Thompson (TT) re same .6; analysis re construction of survey and research on statistics and calls to two experts re questions 1.1;	3.5	
12/21: Commence printing, organization and binding of phase 4 discovery documents 4.0; conf with MM re handling same .2;	0	4.2
12/22: Commence review, analysis and summary of voluminous discovery filings with WW40, Copa, Wagas, Palmdale and Lancaster, including summary memo 4.6	4.6	
12/23: Continue review of voluminous discovery responses and continue with Rosamond, COLA, Boron, Phelan, Grimmway, Adams, State, Landinv, Granite and further D40 7.1;	7.1	
12/27: Continue printing, organization and binding of phase 4 discovery documents 4.8	0	4.8
12/27: Emails to and from LC .2; continue review of voluminous discovery responses and continue with solar, SCE, Big Rock, Grimway, Lemieux clients 6.6	6.8	
12/28: Liason committee meeting and memo to DOL re same 1.2; analysis re class stipulation issues for upcoming trial, and commence draft of same .8; emails to and from TT re survey .2; emails to and from TB and TT re data .2; continue review of voluminous discovery responses for mutual, AVEK, Van Dam, Bolthouse, and various farmers 7.8;	10.2	
12/28: Continue printing, organization and binding of phase 4 discovery documents 3.7	0	3.7
TOTAL ATTORNEY HOURS	48	
TOTAL PARALEGAL HOURS		12.7

Law Office of Michael D. McLachlan, APC

INVOICE

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Phone 310.954.8271 Fax 310.954.8271

DATE: November 2012

Bill To:
Wood v. Los Angeles County Waterworks et al.

For:
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/2: Review D40 responses .1; emails to and from client .2;	.3	
11/5: Emails with Bunn and review RZ statement .1; email WL re injunction .1; review many CMC statements .3; emails with Bunn re drafting comm .1;	.6	
11/6: Review numerous cmc statements .4; review of latest settlement documents and markup of same 1.3; review opp to PO .1;	1.8	
11/7: Review D40 cmc statement .1;	.1	
11/8: Preparation of supp brief on expert motion, review prior pleading and party lists, and analysis re same 3.9; prepare proposed order .4;	4.3	
11/9: Travel to and attend court hearing on phase 4 trial and motions 3.4	3.4	
11/12: Review Bunn memo .2;	.2	
11/14: Emails to and from Bunn .1; call to Entrix re contract .2;	.3	
11/15: Conf call on drafting committee 2.8; conf with DOL re deal points .2; drafting and revisions of assessment comments .4; review of Bunn draft .1; review of discovery order draft and markup same .4; email to Dunn re expert contact .1; email comments re settlement points .6;	4.6	
11/16: Review of revised discovery order draft .2; prepare comments to same .1; emails to and from counsel .2; emails to and from client re settlement issues .4; review final discovery order .1; prepare modified proposed order for court expert .8; emails to and from Dunn .1; emails with counsel re discovery order .2; review hearing transcript .2; email to Fife re discovery .2; review proposed order .1; emails to and from client re settlement issues .3;	2.9	
11/17: Email with client .1;	.1	
11/19: Review discovery filings .3; emails to and from DE re Lancaster, research re same .6; amend order re expert .2;	1.1	

11/20: Review discovery filings .2; emails with Bunn and expert re contract issue .6; revise expert order .2; attention to filing expert correspondence .1	1.1	
11/21: Review Bunn filing, call to client.1;	.1	
11/23: Email with Bunn .1; emails with client re settlement points .4	.5	
11/25: Email with client .1	.1	
11/26: Review of Santa Maria ruling .7; emails with Bunn .1; review and analysis of settlement points and emails and calls to and from client re same 1.6; email to all counsel re settlement position .7; email to TT re status .3; emails with DO re SM ruling .2; file TT corr .1;	3.7	
11/27: Drafting comm meeting, memo to file 1.6; emails to and from DO and client re new PWS position .4;	2.0	
11/28: Emails to and from Moore .1; revise letter to LO counsel .4; emails with client .4; emails to and from Murphy .3; emails to and from BS .1;	1.3	
11/29: Travel to and attend Robie mediation session 15.1; review short and long form settlement documents .5; drafting of class settlement language, review of class member database and groundwork on expert work 2.2	17.8	
11/30: Analysis of revised settlement proposals and emails to and from counsel and call to WS re settlement issues .5; call with client re settlement issues .6; conf with DOL re settlement .2; prepare bullet points and email to WS .6; revise same .2; review PWS proposal and email to Bunn .5; further emails with client re settlement issues .4; emails to counsel .1; review expert exchange .1;	3.2	
TOTAL ATTORNEY HOURS	49.5	
TOTAL PARALEGAL HOURS		0

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: October 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/1: Emails to and from Dunn, Bunn and client re Robie .2; email to counsel re reporter .2; emails to and from BS re settlement .1;	.5	
10/2: Emails re reporter .1; review Rosamond discovery .1;	.2	
10/3: Review latest Robie draft .7; review Fife email .1;	.8	
10/4: Review comments of parties to current draft .5; many emails with Fife and counsel re Robie deal .5;	1.0	
10/5: Review US statement and numerous PO filings .2;	.2	
10/7: Emails to and from DO re feds .2;	.2	
10/8: Review dozen CMC statements .6; prepare CMC statement 1.0; emails with client .2;	1.8	
10/9: Emails with LL re settlement .1;	.1	
10/11: Prepare for hearings on class decert and expert motions, and CMC 1.7; review further CMC statements .3; review discovery responses of Murphy .1; review master settlement document and comments to same 2.4	4.5	
10/12: Travel to and attend court hearings 3.5; meeting with other parties re settlement and trial issues 4.8; review Satalino subpoena .1; emails to and from DO .1;	8.5	
10/14: Review Casey comments .1;	.1	
10/16: Email to LO counsel re class .4; email to all counsel re small pumper settlement issues .4; email to Fife re same .3; review order .1; emails to and from Bunn and counsel .2;	1.4	
10/17: Emails with DO and client re settlement .3;	.3	
10/22: Calls to and from Bunn and Fife .1; call from Bunn and memo to file .2; call with client .2; emails to and from DO re settlement .3;	.8	
10/23: Draft LO letter .5; draft brief re expert .4; emails to DO and client re same .5	1.4	
10/24: Commence work on master allocation order .6;	.6	

TOTAL ATTORNEY HOURS	22.4	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: Sept. 2012

Bill To:
Wood v. Los Angeles County Waterworks et al.

For:
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/3: Review current settlement draft and notes re same .6;	.6	
9/4: Call with Zimmer and memo to DOL .4; call with client .2; prepare long settlement email to Dunn and revise same .7; email and calls to and from Sloan .5; email to DOL re same .1; review Casey comments .2; read LL email and response to same .2; emails to and from Sloan .2; review Bunn comments .1; review WM and RZ comments .1; call with client re settlement .4;	3.1	
9/5: Participate in settlement conference and memo to file re same 2.0	2.0	
9/6: Emails to and from client re settlement issues .3;	.3	
9/7: Review BB memo and current judgment drafts .5;	.5	
9/10: Emails to and from Hughes and review motion .3	.3	
9/11: Email to client on settlement .1;	.1	
9/12: Review of Weeks discovery .2;	.2	
9/14: Emails to and from client re settlement issues .5; review COLA comments .2;	.7	
9/18: Review Robie email .1; review AVWS comments .2; emails to and from DO and client re settlement .3; email to Dunn re same .1	.7	
9/19: Review PO motion .2;	.2	
9/20: Review Blum changes .2; emails to and from Dunn .1;	.3	
9/25: Review BB memo and current master draft .6; email to and from BS re class language .1; review opp to relief papers .2; email to client re Robie	1.0	
9/27: Review further comments to settlement .3;	.3	
9/28: Call from client .1;	.1	
9/30: Email to Dunn on settlement idea .2;	.2	
TOTAL ATTORNEY HOURS	10.6	

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: August 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
8/6: Call from Martin re Sorrento status .3;	.3	
8/9: Emails to and from DO .1; return calls of two class members re lawsuit issues .6; call to RZ .1;	.8	
8/16: Analysis re landowner claims .2; emails to and from DO re strategy for same .6;	.8	
8/20: Review Zimmer email and notice of cont .1; call from class member Austin re lawsuit .4	.5	
8/21: Call and email to Dunn re settlement .1;	.1	
8/23: review order and recalendar dates .1;	.1	
8/25: Review Malibu Outrigger case re decert .3;	.3	
8/27: Review and analysis of most recent settlement draft and memo re same 1.1	1.1	
8/31: Review Blum comments .1;	.1	
TOTAL ATTORNEY HOURS	4.1	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
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Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: July 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/1: Review prior hearing transcripts .6; complete reply brief and edit same, legal research on class issues 2.6; prepare declaration of MDM and exhibits .5;	3.7	
7/3: Receive and review March 13 transcript .2;	.2	
7/5: Review several trial setting statements .3; commence draft statement .6; email re settlement .1;	1.0	
7/6: Review 15 trial setting statements and complete, revise and file trial setting statement 2.1; brief legal research for same .3;	2.4	
7/8: Prepare for hearing 2.9; emails to and from DO re same .2	3.1	
7/9: Travel to and attend hearing on class motions and trial setting 2.6; memo to file re same .2;	2.8	
7/11: Prepare notice of continuance, and revise same .2; analysis and research on questions of partial settlements with water suppliers 1.2; prepare and file notice of cont hearing .2;	1.6	
7/16: Return calls of two class members re status of case and settlement .5; email from BB .1;	.6	
7/18: Review amended orders .1;	.1	
7/25: Review BB memo .1;	.1	
TOTAL ATTORNEY HOURS	15.6	
TOTAL PARALEGAL HOURS		0

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: June 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails to client re settlement .2; call with same re recent changes .3;	.5	
6/4: Participate in USGS conference and subsequent Joe S meeting 3.0; prepare summary memo re same .5; emails to and from RWalker .1;	3.6	
6/7: Review mandate petition .3;	.3	
6/8: Emails to and from client re decert .2;	.2	
6/11: Research on decertification 2.4; commence drafting of decertification motion 1.7	4.1	
6/12: Review prior expert filings and prepare expert motion .5; continue drafting decert motion 2.2; legal research for various issue in motion 2.6	5.3	
6/12: Review of further default and research in class database to locate erroneously defaulted class members 4.7	0	4.7
6/13: Drafting and revision of decert motion 5.4; prepare MDM declaration ISO motion 1.1	5.5	
6/19: Telephonic status conf with court, memo to file .7; review two CMC statements .1;	.8	
6/21: Review BB memo on settlement, current draft settlement and redline of same, markup same .9; review WW email .1;	1.0	
6/22: Participate in AVEK call, memo to file 1.1; email to same re class settlement redraft .1; email to group on settlement position .1;	1.3	
6/25: Review oppositions to motions re expert and to decertify .3;	.3	
6/28: Review AGWA objection .1;	.1	
6/30: Emails with DZ .1; legal research on issues for reply brief on decert and expert motion 2.7; commence reply brief 3.8	6.6	
TOTAL ATTORNEY HOURS	29.6	
TOTAL PARALEGAL HOURS		4.7

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: May 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
5/1: Review six CMC statements .2;	.2	
5/2: Review BB memo .1; participate in hearing and memo to file re same .5;	.6	
5/3: Call from reporter .2;	.2	
5/8: Review RK letter .2; call to client .2;	.4	
5/13: Email from RZ .1;	.1	
5/14: Emails to and from client re settlement issues .3; review BB memo, call to client .1;	.4	
5/15: Review rampdown language and markup of same .4;	.4	
5/17: Email from Zimmer re settlement .1; review and revision of latest settlement draft, prepare limited version, email to counsel 1.7;	1.8	
5/18: Participate in AVEK settlement call 1.2;	1.2	
5/22: Analysis of draft changes and prepare further comments .8	.8	
5/23: Emails re settlement .1; call from class member Nolan re lawsuit status and property issues. .5	.6	
5/24: Review and analysis re Zimmer emails on settlement changes .3; further settlement emails .2;	.5	
5/25: Review transcripts .2; review Quartz Hill modified judgment .5; call and email to Brunick .1; call with Bunn .3; conf with DOL re strategy .3; prepare and revise long email to Zimmer and group re settlement .9;	2.3	
5/26: Emails to and from RZ .2;	.2	
5/29: Calls to and from BB .1; long email to Zimmer and counsel re settlement issues for class, call client, and revise same .9;	1.0	
5/31: Call with Bunn .5; analysis re motion to decertify and withdraw .8; email to Walker .1; review settlement terms, call to client, and email to Bunn re settlement terms .9	2.3	
TOTAL ATTORNEY HOURS	13	

TOTAL PARALEGAL HOURS		
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Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: March 2012

Bill To:
Wood v. Los Angeles County Waterworks et al.

For:
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
3/1: Email to and from MF re Robie and settlement .2; research and analysis re viability of MSJ as to prescription claims 2.3;	2.5	
3/2: Review MO re trial setting .1; email to RWalker re error .1;	.2	
3/6: Review OSC .1; emails with LO counsel re meeting .1;	.2	
3/7: Emails to and from RZ .1	.1	
3/8: Further research on viability of MSA as to prescription 2.7;	2.7	
3/12: Review opposition and research re County arguments .8; review six CMC statements .4; email to LO counsel .1;	1.3	
3/13: Travel to and attend hearings (incl. continued expert motion) and status conference 2.5; review Weeks motion papers .1; email from Bunn re settlement .1;	2.7	
3/14: AVEK settlement call 1.4; review RK motion for reconsideration .3;	1.7	
3/22: Call from Thompson re status update on case .2;	.2	
3/23: Email to LO counsel .1;	.1	
3/27: Review weeks email and attachments .3; email to Weeks .1;	.4	
3/28: Review defaults notices and compare with class lists 7.4	0	7.4
3/29: Emails to and from client .1;	.1	
3/29: Review defaults notices and compare with class lists 5.3	0	5.3
TOTAL ATTORNEY HOURS	12.2	
TOTAL PARALEGAL HOURS		12.7

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: February 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
2/1: Review opps and other filings of this day .5; emails with BW re motion .1; emails with Putnam re Mason .3; call with R Valentine re issues with membership and property .4; review and analysis of Robie memo .4;	1.7	
2/2: Emails and call with Valentine .4; many emails with Weeks re discovery .6; emails with Putnam .1;	1.1	
2/3: Emails with Putnam re Mason issues .3; call with DE re settlement .3	.6	
2/6: Review reply filings on various motions .5; email to client .1;	.6	
2/7: Review Satalino discovery and opps .3;	.3	
2/8: Review BW motion filings .2; prepare and file statement re discovery 1.1; review and analysis re BB memo and watermaster regs, summary memo re same .8; emails to and from RK re class list .2;	2.3	
2/10: Review CMC statements .2;	.2	
2/13: Email to DE re settlement .2;	.2	
2/14: Travel to and attend trial setting conference, conf with client 2.9 (1.0);	2.9	
2/15: Review agenda, US corr, and Blum letter .1;	.1	
2/17: Participate in AVEK settlement conference 1.6; review some of the mass depo notices served .1; many emails with RK re appeal .4; review WW email .1;	2.2	
2/18: Prepare summary of depositions notice .6	0	.6
2/21: Travel to and attend principals settlement meeting 3.6; memo to file re same .2;	3.8	
2/22: Emails from WW and MF, review 7/11/11 transcript .4;	.4	

2/23: Emails to DO re settlement .2	.2	
2.24: Further emails re settlement issues .2;	.2	
2/27: Review allocation, physical solution, meeting minutes on settlement .7; memo to file re same .2; email to Bunn .1; emails with Kuney re meeting .1; numerous settlement emails .4; analysis of Robie spreadsheets re allocation .4; email to WW, memo to file .2;	2.1	
2/28: Email to RWalker re hearing .1; emails with counsel on future dates .2;	.3	
2/29: Emails with RWalker .1; review notice and call to RZ .1;	.2	
TOTAL ATTORNEY HOURS	19.4	
TOTAL PARALEGAL HOURS		.6

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: January 2012

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
1/5: Emails to and from DZ re appeal .2;	.2	
1/6: Call from Martin re status of case .3;	.3	
1/10: Review weeks motion to compel .2; legal research on decertification 5.9	6.1	
1/12: Email to Dunn and Bunn .2;	.2	
1/17: Review D40 motion for legal findings and legal research re same 1.3;	1.3	
1/18: Prepare motion for order re expert 2.8	2.8	
1/19: Review OSC filing .1	.1	
1/24: Call with Brian Martin on case status for Sorento, analysis re class status .6; emails to and from Weeks .1; review class exclusion analysis and prepare modified class member/parcel version, email to Weeks re motions .5;	1.2	
1/25: Prepare legal memo to DO and file re ethical and legal issues in decertification 3.8	3.8	
1/27: Emails to and from BW .1;	.1	
1/30: Emails to and from client .2;	.2	
1/31: Many emails (20+) with Putnam re Mason, and research and analysis re class members wrongfully named in Weeks' two pending motions 1.4; review opps to D40 motion .9; review BB memo, calendar same .1;	2.5	
TOTAL ATTORNEY HOURS	18.8	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: December 2011

Bill To:
Wood v. Los Angeles County Waterworks et al.

For:
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
12/2: Participate in AVEK meeting, memo to file 2.5; read willis statement .1	2.5	
12/5: Phone call with Weeks re settlement issues .4; call with client .2; emails to and from RK .3;	.9	
12/6: Emails to and from RK .1; review current allocation matrix and brief .3; review and markup of consensus document .6; email to all re settlement .2; prepare letter to Robie .5; review Copa terms .2; research on amended judgment appealability .8; email to and from DZ re same .4;	3.1	
12/8: Emails re settlement .2; review water right claims .2; review record designation on appeal .2	.6	
12/9: Prepare status conf stmt .4;	.4	
12/13: Travel to and attend CMC, memo re same	2.8	
12/19: Emails to and from DZ re fee issues .3;	.3	
12/21: Call with RZ .3;	.3	
12/27: Review appellate docket and consol order, email to BBK .2;	.2	
12/29: Emails with DZ re appeal dismissal and handling fees .3; conf with DO re same .1; call with RZ re settlement .5;	.9	
TOTAL ATTORNEY HOURS	12	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: November 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/1: Call from class member .2; call with Leever .5; emails to and from D counsel .1;	.8	
11/4: Review BB memo and call to same .1;	.1	
11/7: Email to and from EG .1; review settlement corr .1; review RK opp .2;	.4	
11/8: Review 10/12 transcript and email to DO re same .2;	.2	
11/10: Review emails re settlement .2; review CMC statements .3; review BW discovery .2; prepare CMC statement and declaration of MDM, conf with DO re same, revise and file 2.8	3.5	
11/14: Prepare for status conf., including review of various statements and prior transcripts .4;	.4	
11/15: Travel to and attend status conference at CCW 3.3; review proposed order and corrected proposed order .1	3.4	
11/16: Review OSC .1;	.1	
11/17: Review order and conf with DOL .1; prepare for and attend conf call with MD and John U .6; review and analysis of summary expert report and tech comm. reports on water use issues .5; email to MD and JU .1; review settlement language and voluminous comments .5; email to Brunick .1; email to BW re extension .1; review BB memo, email to client .1; email to BB .2;	2.3	
11/18: Emails to and from DO re motion strategy .5; travel to and attend settlement meeting 4.4	4.9	
11/19: Long strategy memo to DO .8	.8	
11/22: Emails to and from BS .1; review BW draft letter .1;	.2	
11/28: Review notice of appeal and many emails with RK and DZ .4;	.4	
11/29: Emails with client re settlement .2;	.2	
TOTAL ATTORNEY HOURS	17.7	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
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INVOICE

DATE: October 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/3: Emails to and from client re settlement .5;	.5	
10/5: Review settlement correspondence .1; prepare CMC statement, DO conf. and revise same .5; email from SH re data and email to DO .1;	.7	
10/6: Draft letter to Garner, conf with DO re same, and revise 1.3;	1.3	
10/7: Review CMC statements .2;	.2	
10/11: Review CMC statements .1	.1	
10/12: Analysis re handling water use proof issue .6; meeting with O'Leary on proposed filing and strategy .4; emails with client on settlement meetings .1; call with client re CMC and settlement .7	1.8	
10/13: Call with client .4;	.4	
10/21: Review BB draft phy solution and markup of same .4;	.4	
10/26: Review email and data from SH .1; email to client re same .1;	.2	
10/27: Emails to and from SH .2; emails with client re data and settlement .3; review settlement document from RZ and emails from counsel .3	.8	
10/28: Attend AVEK meeting and memo to file re same 4.7	4.7	
TOTAL ATTORNEY HOURS	11.1	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: September 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/2: Emails to and from Bunn .1; review and analysis of last settlement allocation, mediation submissions, review prior discovery responses and summary memos and create updated version of more likely water use for big players 5.6	5.7	
9/5: Research on calculation of landscape water use, and rural residential use in desert climates, review various studies of same and prepare memo 6.4;	6.4	
9/6: Call with client on allocation issues .3; emails to and from same .5; review and analysis of AB 1881 and potential regs .4; continue research on and rural residential use studies 3.7; review summary expert report for baseline data and calculations of potential water use, create spreadsheet for same on range of known class uses 1.7; email to client re water use and settlement .4;	7.0	
9/7: Emails to and from WW, client, and other PWS re water use data .3; research on line for available data on residential use from water suppliers in desert areas .9; review fee order .1; review Joe S 2010 depo and pull relevant text from summary report, email to DO re water use opinions .5; email to PWS 1;	1.9	
9/7: Travel to UCLA to get articles and studies on water use for MM		3.8
9/10: Call with client re settlement issues .4;	.4	
9/12: Further research on class water use, including review of expert data and phase 3 reports and analysis of same 3.7;	3.7	
9/13: Emails to and from client on settlement issues .1; further review and analysis of party submissions to Robie from Bunn .5; long email to DO re water use .7; email to and from client and DO re same .5; emails with JUK .1;	1.9	
9/14: Further research on ag studies of landscaping requirements, review prior trial exhibits, summary memo re same 5.2	5.2	
9/15: Emails with client on water use .3; emails to and from Bunn re PWD data .2; research on state laws relating to domestic use .5; email to client re legal issues and impact of 106 .8;	1.8	
9/16: Prepare summary of settlement terms .7; email to client re same .5;	1.2	

9/19: Emails to and from client re domestic use and legal issue re settlement .9;	.9	
9/21: Review and analysis of Mojave basis studies .7; emails to and from WW re Joe S data .1; review amended Willis judgment .1;	.9	
9/22: Telephonic hearing and memo re same .4;	.4	
9/23: Review Dunn letter, email to client re Robie .1;	.1	
9/26: Call with client .6; review CMC statement .1; email to Justice Robie re data issues .2; emails to and from client re Mojave study .3; review order and emails with RK .3; review AV press article .1; call from client .2;	1.8	
9/27: Emails to and from Robie and Dan .1;	.1	
9/28: Revise settlement terms summary and email to client .5; emails with client re same .2;	.7	
9/29: call with SH re LS docs and meeting, email to DO .2; email to SH re same .1	.3	
TOTAL ATTORNEY HOURS	40.4	
TOTAL PARALEGAL HOURS		3.8

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: August 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
8/3: Emails and calls with client on numerous settlement issues 1.3; calls to and from BS and MF .2; legal research on domestic use and prescription issues in case law, statutes and regulations 3.8; conf. with DOL on Robie sessions .1; emails to and from M Moore .1; email to client and Davis .1;	5.6	
8/4: Conf call with client and DOL re: settlement issues .5; emails to Bunn and BBK .1; conf call with Davis, JUK., re settlement issues .7; call with client .3; call to M Moore .1;	1.7	
8/5: Review writ and supporting papers .5; review and analysis re settlement materials from client .7; prepare settlement brief for Robie 1.8; emails to client and DO re same .1; conf with DO and finalize brief .4; email to Robie .1;	3.6	
8/6: Emails to and from DZ re settlement and writ .3;	.3	
8/9: Emails to and from RWalker .1;	.1	
8/10: Emails to and from DE re Rosamond service are changes and attention to verifying class membership issues 1.2; email to DE re findings .1;	1.3	
8/11: Review MO re Robie and hearing, email to DO .1; review RZ CMC .1;	.2	
8/16: Review 7/11 transcript .2;	.2	
8/23: Emails to and from client on settlement .3; prepare reply brief on expert motion, conf with DO re same, revise and file 2.9;	3.2	
8/24: Review US and Willis CMCs .1; long call with client .5; emails with RK .1;	.7	
8/26: Review five cmc statements .2; email to Moore re mediation .2;	.4	
8/29: Prepare for hearing, review transcripts .7;	.7	
8/29: Prepare hearing binder for motion, index transcripts .8	0	.8
8/30: Travel to and attend hearing on expert motion and status conf 2.3; memo to file re same .1; conf with DO .2;	2.6	

8/31: Travel to, prepare for and attend Robie mediation 9.7; meeting with DOL re strategy .7;	10.4	
TOTAL ATTORNEY HOURS	31	
TOTAL PARALEGAL HOURS		.8

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
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INVOICE

DATE: July 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/5: Review and analysis of EG settlement markup, and further changes to same .9; emails with BBK .2; review SoD reply .1; review and analysis of Phase 3 transcripts on 5 points, and prepare summary memo re same 5.7	6.8	
7/6: Review Joe S trial testimony for 3 points and prepare summary memo of same 2.4	2.4	
7/7: Calls and emails to and from Dunn .1	.1	
7/8: Call with Dunn and WW .5; talk with DOL .1; calls to landowner counsel .1;	.7	
7/11: travel to and attend hearing and cmc, memo to file re same 2.5; commence motion authorizing expert work 2.8	5.3	
7/12: Review and summarize prior hearing transcripts re expert motions and review relevant filings and order, memo re same 2.1; complete motion authorizing expert work, conf with DO re same, and revise and file 4.2; long email to RK re common issues and settlement .6; emails to and from DZ re appeal .3; email to DO re settlement strategy and issues on expert .5;	7.4	
7/13: Assessment of revised settlement changes and two long emails to EG re same .9; review and analysis or RK supplemental application.2; legal research re procedure for same .8; review of SoD and check hearing notes re return flows .3; emails to LO counsel re same .1;	2.3	
7/14: Review and analysis of settlement and emails to and from BBK re same .5; review MO and email to RWalker re error .1; review agreement and prepare revised version, seven emails with PWS re same .7; conf with DO re settlement issues .3; emails and from DE re settlement .3; call to client re same .3;	2.2	
7/15: Emails to LO counsel re watermaster .2; emails to and from client re Robie and settlement .3;	.5	
7/18: Review Orr letter .1; emails to and from class member Williams .4; review Bunn comments .1;	.6	
7/19: Emails to and from client and call to same re settlement issues .4; 9 emails to and from PWS re settlement issues .7	1.1	

7/20: Emails with client re watermaster issues .2; long email to DO and client re settlement .4; call to BS .1; emails with KL re settlement .2; call with MF re watermaster .2; emails to and from Bunn .2; email to KL re settlement .2; email to and from CM Williams re lawsuit .3;	1.8	
7/21: Return call from three CMs, and update master memo re same .9; emails with client .1;	1.0	
7/25: Conf with DO re handling settlement, global and otherwise .6; draft letter to Robie and email to DO re same .8; emails to DO and client re same .2;	1.6	
7/26: Further revisions to agreement and email to Bunn re same .7; emails and call with client re settlement .3;	1.0	
7/27: Review MO re Robie, emails with JM and TB .1	.1	
TOTAL ATTORNEY HOURS	34.9	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: June 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
6/6: Review and markup proposed SoD .4;	.4	
6/8: Research on settlement standing issues 1.2; revise reply brief 1.1; email to SH .1;	2.4	
6/9: Call with client .3; preparation of Wood declaration .8; emails to and from DO and client re reply papers .2; prepare MM decl .5; attention to revision of reply documents and numerous email to BBK re same 1.3	3.1	
6/14: Review proposed add on order and email to JD .1; emails with SH .1; prepare preliminary approval order .8; email to RWalker .1;	1.1	
6/15: Prepare for class approval hearing 2.7	2.7	
6/16: Travel to and attend hearing for settlement approval, and meeting with JD and WW afterward, memo to file re same 4.6;	4.6	
6/20: Prepare revised settlement agreement 1.4; email to Dunn .1;	1.5	
6/21: Review SoD and objections to same .7; prepare joinder .1; emails to LO counsel re objections .2	1.0	
6/22: Emails to RWalker .1; emails to JD. 1; emails to RK re appeal issues .2;	.4	
6/23: Review client comments to agreement .2;	.2	
6/24: Emails to DO and client re settlement .2; email to WW .1; LO call .5;	.8	
6/25: Long email to LO counsel re prescription .5; emails to and from LO counsel re Robie .4; emails with client re settlement .2;	1.1	
6/27: Letter to Robie 1.0;	1.0	
6/28: Emails with RWalker .1; call with class member Hulick .4	.5	
TOTAL ATTORNEY HOURS	20.8	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: May 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
5/1: Prepare class notice 1.2; prepare summary notice .2; prepare email re timeline .2; emails re approval to BBK .2;	1.8	
5/2: Review EG decl .2; attention to preparation of all settlement approval paperwork, motion, exhibits, order, declarations, and revisions to same, including over 70 emails and calls with D counsel 10.4	10.6	
5/3: Prepare notice of lodging .2;	.2	
5/6: Review tentative and RK fee order .3;	.3	
5/10: Emails with client re settlement .2;	.2	
5/13: Review oppositions to settlement .6; emails to and from RK and DZ re fees .2;	.8	
5/16: Commence drafting reply brief for settlement approval 2.4;	2.4	
5/17: Emails with WW .1; review BBK reply and markup same and 13 emails re same 1.7;	1.8	
5/19: Review MO re SoD .1;	.1	
5/23: Review RZ opp .1; review AGWA filing .1;	.2	
5/27: Emails to and from RWalker re hearing .1;	.1	
5/31: Review and summary of reply points .5; long email to SH re handling reply .7;	1.2	
TOTAL ATTORNEY HOURS	19.7	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

INVOICE

DATE: April 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
4/5: Email with PM group .1; emails to and from WW re settlement .1.0; 15 other settlement emails .4;	1.5	
4/8: Emails with D counsel re settlement .2; emails with LO counsel re closing .5; review Dunn markup of judgment and email to same .1;	.8	
4/11: Work on judgment .3; email re same .2; review Bachman decl .2; prepare closing argument 2.7	3.4	
4/13: Travel to and attend trial 6.1	6.1	
4/15: Review Wellen letter and emails to and from Gene .4	.4	
4/19: Emails to and from client .2;	.2	
4/20: Emails from Dunn on judgment .1; emails with DO re handling .3; research on board approval of settlement .3;	.7	
4/21: Further changes to judgment .2; many emails with D counsel re same and settlement .6	.8	
4/23: Emails and call with client .3; email to Wes re settlement .2; emails with RWalker .1;	.6	
4/25: Emails to and from SH re meet and confer .4; emails to and from RK re settlement issues .3; email to Dunn re settlement .2; prepare letter to Judge re meet and confer .6; email to DO re same .1; revise letter .1; email to Bunn re same .1; emails to and from RWalker re letter .1;	1.9	
4/26: Conf call on proposed judgment .9; emails to and from client and DO re settlement .3; emails to and from D40 re settlement .2; revise judgment and emails re same .5; email to RWalker .1; 12+ more emails on settlement execution .4;	2.4	
4/27: 11 emails re settlement .4; email to client re settlement .2;	.6	
4/28: Call from Wellen and Garner .2; call with client .3; review Hedlund drafts .2;	.7	
4/29: Emails to and from WW re approval motion .4; call with client .2; email to and from RWalker re hearing .2;	.8	

4/30: Lone email to D counsel re approval .4; email to DO and client re settlement .3;	.7	
TOTAL ATTORNEY HOURS	21.6	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: March 2011

Bill To:
Wood v. Los Angeles County Waterworks et al.

For:
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
3/1: Emails from D counsel re settlement .1;	.1	
3/2: Emails re trial transcripts .1;	.1	
3/3: Emails with client re settlement .2; 17 emails to and from D counsel re same, and further modify settlement .7	.9	
3/4: Review PWS response re Joe .2; email to DZ re fee material .3; email from D counsel re settlement .3;	.8	
3.5: Further changes to agreement and emails re same .2	.2	
3/7: Review fee bill opps .2; modify settlement and email to counsel re same .3;	.3	
3/8: Further changes to agreement and emails re same .2; email to WW re fees .1; emails to and from 3 class members re questions .6	.9	
3/9: Email to Markman re settlement .2; brief review of opps and email to RK re same .3; emails to and from DO re trial and settlement .5; call to client re same .3;	1.3	
3/10: Email to DZ on reply .2; emails to and from CM Lytle re lawsuit and issues with well .6; emails with RK re fees .2; emails to and from LO counsel re trial .2; email to D counsel re fees .1;	1.3	
3/11: Review numerous oppositions re fees motion .8; call from Hansen re transcripts .1;	.9	
3/13: Emails with Miliband re settlement .1;	.1	
3/14: Travel to and attend trial 9.3; prepare summary re same .6; emails with LO counsel re trial .3; research and commence drafting of reply brief re Willis fees motion 1.4;	11.6	
3/15: Travel to and attend trial 9.5; prepare summary re same .5; complete draft of Willis reply on fee motion 1.2; email to KL re settlement .1; email to WW re same .1	11.4	
3/16: Travel to and attend trial 9.6; ; prepare summary re same .8; emails to D counsel re settlement .2; email to LO re offer of proof authority .4; emails with LO counsel re trial issues 3;	11.3	

3/17: Travel to and attend trial 6.1; emails with D counsel re settlement .3; emails to LO counsel re trial .2;	6.6	
3/18: Call with DE .1; emails with D counsel re settlement .3; emails to LO counsel re trial .5;	.9	
3/21: Review recent briefs on fee motion 1.2; email to DE re judgment .1;	1.3	
3/22: Travel to and attend trial 9.2; prepare summary re same .4 prepare judgment 1.1	10.7	
3/23: Travel to and attend trial 9.3; ; prepare summary re same .3	9.6	
3/24: Email to JT re settlement; travel to and attend trial, summary re same 8.0;	8.0	
3/25: Travel to and attend trial, summary re testimony 8.4;	8.4	
3/28: Travel to and attend trial, summary re testimony 8.1;	8.1	
3/29: Travel to and attend trial, summary re same 3.4; emails to and from DE and modifications to judgment .7; email to DO re trial .2; analysis and review of BB settlement framework .4;	4.7	
3/30: 12 emails to and from D counsel re judgment .4; emails to and from LO re closing .2;	.6	
3/31: WW email and memo from BB, email to DO re global settlement .3;	.3	
TOTAL ATTORNEY HOURS	100.4	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: February 2011

Bill To:
Wood v. Los Angeles County Waterworks et al.

For:
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
2/1: Travel to and attend trial, meeting with counsel 10.2; emails to WW re settlement .1	10.3	
2/2: Travel to and attend trial, preparation of X for Durbin, review and summary of depo 18.9; email to R Walker .1; emails with RK re settlement .4; email to LO counsel re schedule .2;	9.6	
2/3: Travel to and attend trial, ex parte app, continue Durbin prep 7.4; long call with CM Pike re lawsuit and property issues .5; emails to and from West re settlement .8; emails with MF re trial .1;	8.8	
2/4: review Beebe depo and commence prep of outline for same 4.6;	4.6	
2/5: Summarize Durbin depo vol 2 5.1;	5.1	
2/8: Emails to SH re trial status .1; finish Durbin cross 1.3;	1.4	
2/9: Review and supplement Wildermuth outline and review of exhibits 1.8	1.8	
2/11: Emails from LO counsel re trial .1;	.1	
2/13: Legal research and preparation of objection to Joe S exhibits 1.8; email to LO counsel re same .1;	1.9	
2/14: Travel to and attend trial 9.3; review and summary of PWS discovery responses .6; review D40 response to Willis disco and email to RK .1	10.0	
2/15: Travel to and attend trial 9.6; emails to and from RK re legal issues on fees .5;	10.1	
2/16: Research on scholarly articles regarding desert recharge 1.6; emails to MF re same .1; travel to and attend trial 9.8;	11.5	
2/17: Travel to and attend trial 7.3; emails to and from WW re settlement .2; email to DO re Durbin .4;	7.9	
2/18: Call from G Wheeler re lawsuit .4	.4	
2/19: Emails with WW .1;	.1	
2/20: Emails to LO counsel re trial .2;	.2	

2/22: Review RK ex parte papers .4; emails to and from WW re fees, analysis re same .3; review Bunn comments to settlement .1;	.8	
2/23: Prepare for hearing 2.4; emails to and from DZ re hearing issue .2; revise settlement agreement and circulate same .9; further modification to same and circulate .2; call from TB .1; revise agreement and email to all counsel .3; emails with JU .1;	4.2	
2/24: Travel to and attend hearing on Wills settlement, expert motion etc., memo to file 4.6; email to Dunn re missing parties .1; emails to LO re same .1; email to Reinhard re water use .1; emails to and from DE .1;	5.0	
2/25: Emails with DE re settlement .3; emails to and from DZ re fees .2;	.5	
2/28: Emails from D counsel re settlement .1;	.1	
TOTAL ATTORNEY HOURS	94.4	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

10490 Santa Monica Boulevard
Los Angeles, CA 90025
Phone 310.954.8271 Fax 310.954.8271

DATE: January 2011

Bill To:

Wood v. Los Angeles County Waterworks et al.

For:

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
1/2: Email to LO counsel re Joe S .1; review and analysis of expert report, depo exhibits and prepare X for Wildermuth 4.6	.1	
1/3: Emails with Strager re settlement .5; emails with Brewer and SH re error re same .3; review Joe motion .2; emails re LO counsel re same .3	1.3	
1/4: Review Joe S order .1; travel to and attend trial, planning meeting with counsel 9.2; emails to and from CM Jones .1;	9.4	
1/5: Emails to LO counsel re trial issues .3; travel to and attend trial 8.6;	8.9	
1/5: Attention to assembly of trial exhibits and trial docs in binders, instructions to copy service re copying 6.9	0	6.9
1/6: Travel to and attend trial, attention to prep 8.9; work on settlement agreement .5; email to D counsel re same .2;	9.6	
1/7: Emails re settlement .2; emails re depositions .1; review letters .1;	.3	
1/8: Summarize Joe S. depo vol 1 5.7; emails re exhibit numbering .1;	5.8	
1/9: Summarize Joe s. depo vol 2 5.1;	5.1	
1/10: Attend Joe S deposition 3, summary memo re same 3.3;	3.3	
1/11: Attend Joe S deposition 3, summary memo re same 3.9; email to JU .2; review and analysis of Joe S exhibits and prepare summary of same 2.4; emails to and from WW and BBK re settlement .2; emails to and from counsel re Joe S issues .3; review RK discovery and email to same .2; excerpt Joe S prior testimony and email to JU .5;	8.0	
1/12: Emails with David group re rural residential issues .5; attend Joe S deposition 3, summary memo re same 4.1; emails to D counsel re cumulative testimony motion .4; review new Joe S exhibits and supp summary of same .5; long call with CM Anderson .6; analysis re same and email to SH .2;	6.3	
1/13: Emails re settlement .1; attend Joe S deposition 4, summary memo re same 4.0; emails to S Reed re proposal .2; emails with LO counsel re planning for Joe cross .3;	4.6	

1/14: Emails with LO counsel and analysis of Fife outline for Joe S .4; conf call with LO counsel re cross of Joe, memo to file .9;	1.3	
1/15: Emails with JU .1; review records and testimony and analysis of base period issue 1.1; review of expert report on same .3;	1.5	
1/16: Prepare exam outline for Joe S and exhibits for same 3.8;	3.8	
1/17: Emails to SH re exhibits .1; attend Joe S deposition 4, summary memo re same 4.0; 15+ emails with LO counsel re Joe S cross .7;	4.8	
1/18: 20+ emails to and from LO counsel re Joe S issues and cross .9;	.9	
1/19: Emails to and from class members .3; emails with LO counsel re Joe S cross .6;	.9	
1/20: Travel to and attend Joe S depo 10.4; emails to DO and MF re same .3;	10.7	
1.22: Emails to and from RK .1;	.1	
1/23: Emails with LO counsel re planning for trial, review Fife calendar .2; emails with RK .1;	.3	
1/24: Commence preparation for Oberdorfer, review and summarize depo 3.4; review Fife analysis .3; LO call and memo to file .7;	4.4	
1/25: Travel to and attend Joe S depo 10.7;	10.7	
1/25: Attention to organization trial exhibits, depositions for trial 5.8	0	5.8
1/26: Long email to LO counsel re Joe .5; attend Joe S deposition, summary memo re same 5.0;	5.5	
1/28: Review RK settlement .4; review final approval hearing papers .9; review Fife water board filings .2;	1.5	
1/29: Review Fife Wildermuth notes .2; review and summary of Wildermuth depo and exhibits 4.5	4.7	
1/30: Continue prep for Wildermuth, prepare cross outline 2.7	2.7	
1/31: Travel to and attend trial 9.2;	9.2	
TOTAL ATTORNEY HOURS	125.7	
TOTAL PARALEGAL HOURS		12.7

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: December 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
12/1: Email to Markman .1	.1	
12/2: Emails to D counsel re settlement and modify same .5;	.5	
12/3: Review and analysis of AGWA's MILs .5; emails to D counsel re settlement, analysis of comments, phone calls and modify same 1.4;	1.9	
12/6: 15+emails to D counsel re settlement, analysis of comments, phone calls and modify agreement 2.7; call with client re agreement changes .8;	3.5	
12/7: Emails with WL re agreement .2; emails with Trager re requested changes .9; revise draft agreement, further emails 1.2;	2.3	
12/8: Emails and call with Trager 1.0; emails with DE, memo to file .2; review and analysis of Bolthouse disco responses .4;	1.6	
12/9: Review and analysis of defaults and service cf with class database, memo re same 2.7; ex parte notice email, research same .2;	2.9	
12/10: Review PPH brief .1; review app to extend trial brief and objection .1; review US opps .2; review Zimmer MIL .1; emails with DE re settlement .2; email to D40 re settlement, conf with DO, send .4; emails to and from client .2;	1.3	
12/11: Long email to client re settlement issues 1.4; call with client to discuss settlement changes .8;	2.2	
12/13: Emails and call with client re agreement issues .9; emails with MF re WFF .1; call with DE .2; revise agreement 1.0; email to D counsel .2;	2.4	
12/14: Emails and call with JM .2; emails and call with Trager .7; email to DE re agreement .2; review AGWA MIL 4 .1; review pretrial statements .2; review opps of D40 to AGWA MILs .2; review leave to file expert design. and opps .2; prepare for hearings 1.2;	3.0	
12/15: Travel to and attend pretrial conference, memo to file re same 4.1; review RK outline .1; emails to and from LO counsel re trial issues .5; emails to and from D counsel and several revisions to agreement .5;	5.2	
12/16: Emails with D counsel, draft long email to EG, conf with DO, revise and send 1.0; emails with DE re agreement .3; email to JM re same .1; revise agreement and email to counsel re same .4;	1.8	

12/17: Email to to WW re motion .2; email to and from JM .1; emails with WW re settlement .1; detailed review and editing of agreement, email to D counsel re same 1.2;	1.6	
12/19: Legal research for MIL 1.7; review prior order, transcript and depo testimony for MIL, and commence drafting same 2.8;	4.5	
12/20: Review and analysis of voluminous trial filings and exhibits, prepare summary memo re same 2.3; complete, conf with DOL, and revise MIL 1 1.0; prepare summary of MILs and arguments for each 2.5; many (20+) emails and call with Reed re online depo issues, exhibits, trial and transcripts .7; email to and from CM Jones and analysis re class membership issue .4; 14 emails with CM Brewer re property issues and class membership .6; emails to and from MF re MIL.1; emails to and from MF re Del Sur and online investigation of WC 106 hearing .5;	8.1	
12/21: Review RJN and analysis re attacking same .3; emails to and from West .1; review client collection of USGS material, analysis and summary of same 1.7; call with client re trial issues, water level analysis, and maps .8;	2.9	
12/22: Email to DZ re willis class contact .1;	.1	
12/27: Email to D counsel re settlement .2; emails to and from Trager and Bunn .1;	.3	
12/28: Emails to and from client re water level, and analysis of map .3;	.3	
12/29: review Joe S ruling .1; email to RWalker re hearing .1; emails with same re ex parte details .1; emails to LO counsel and Dunn re ex parte notice .1; emails and call with MF .2; prepare and file objection to same, conf with DO and revise and file 1.1; emails with MF re same .1; email with LO counsel re ex parte .2; email with RW re same .1; review emails on notice and emails with SH .1; emails with DO re Joe situation .2; many (30+) emails with LO counsel re handling Joe situation .8; conf call with same re same, memo to file .7; email to and from RWalker re hearing .1; review Fife objection .2;	4.2	
12/30: Email comments to MF .1; 25+ emails and calls to and from LO counsel re handling Joe situation 1.0; prepare and revise ex parte application re Joe S, conf with DO and file same .8; review opp, Joe S testimony, legal research and prepare reply brief on MIL 1 3.8; email to RWalker re calendar issue .1; 30+ emails with LO counsel re Joe S handling .8;	6.6	
12/31: Hearing on ex parte app and memo to file .4; review various recent trial filings .3; emails from LO counsel re trial .3;	1.0	
TOTAL ATTORNEY HOURS	58.3	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: November 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
11/1: Review and analysis of expert report, docs produced, voluminous USGS reports and data, research re Durbin articles, and prepare outline for depo of same 7.9;	7.9	
11/2: Email from Fowler and call with same on settlement language .8; complete prep for Durbin depo 4.1; emails with DE re settlement .1;	5.0	
11/3: Email from West and review framework docs .3; call to same .5; attend PG call on settlement, memo to file 2.6; commence review of PWS data production, analysis of same, and preparation of summary memo and excel data summary re same, cf USGS report data 6.5	9.9	
11/4: Emails with client re settlement issues .2; review and markup of updated accord docs, call to Fowler .7; draft long settlement letter to EG, conf with DO, revise letter 2.2; emails with DE .1; call to client .2; commence preparation for Joe S depo, review of docs and outline for same 4.2;	7.6	
11/5: Review PG materials .3; call from DE .1; attend PG call on settlement, memo to file 2.4; emails with Trager .1; continue data analysis project and cross referencing with summary expert report tables, update master analysis memo 4.8;	7.7	
11/6: Continue data analysis project and cross referencing with summary expert report tables, online research to pull down many cites in report, update master analysis memo and commence outlines for trial 8.8;	8.8	
11/7: Continue data analysis project and cross referencing with summary expert report tables, online research to pull down many cites in report, update master analysis memo and exam outlines for trial 5.8;	5.8	
11/8: Email from West re framework and call with same .4; review and markup of current document .7; continue data analysis project and cross referencing with summary expert report tables, update master analysis memo and commence outlines for trial re same10 5.6;	6.7	
11/9: Continue data analysis project and cross referencing with summary expert report tables, update master analysis memo, and exam outlines for trial re same10 .6	10.6	
11/10: Review West memo and call to same .4; continue data analysis project and cross referencing with summary expert report tables, update master analysis memo 5.2; attend PG call and supp memo 1.9;	7.5	

11/11: Review and analysis of USGS data, expert data and prepare basinwide analysis re water levels from 1980 to present, summary memo re same and highlight errors in expert report re same 5.9; continue data analysis project, literature review, cross referencing with summary expert report text, update master analysis memo 3.2;	9.1	
11/12: Preparation for Joe S depo, and outline for same 2.4; review Willis objection .1; continue review and analysis of water levels, summary memo re same and highlight errors in expert report re same 6.2; emails and call with Reed and LO counsel re depo issues .5; review and analysis of accord docs, markup framework, call to West .6;	9.8	
11/13: ; Continue review and analysis of water levels, summary memo re same and highlight errors in expert report re same, work up master list of expert report issues, supplement trial outlines 6.9; review PPH discovery response .1; review Dunn letter, email to DO .1;	6.9	
11/14: Review Joe S prior testimony and complete depo outline for Joe 3.8; email and call with Reed re depo issues .3;	4.1	
11/15: Travel to and attend Joe S depo 9.1; review cms statement and emails with DE .3; summarize Joe S notes .8	10.2	
11/16: Travel to and attend Joe S depo 9.6; email to Bunn et al .1; review amended CMS statement of 40 .1;	9.8	
11/17: Emails and call with client .4; review and analysis of Bunn outline .4; call to West re same .5; prepare for hearings 1.4; emails with EG re settlement .2; summarize Joe s notes .6;	3.5	
11/18: Travel to and attend hearings on willis and other motions and status conf., memo re same 4.5	4.5	
11/19: Emails from Bunn and review doc .2; email from West and review settlement offer, markup of same .7; legal research on finality of class judgment 3.7; draft memo re same and email to RK and DZ 1.4; participate in PG call and memo to file 1.5; long email from West and review new offer .3; email and call to same re issues .4; conf with DO .2; many (14+) emails with West re offer changes .9; call with client re same .3; review MOs .1; further emails with RK re finality issues .4; emails with DE .1;	10.2	
11/22: Conf with DO and client, email to West on objection to accord .7; call from Waldo re same .5;	1.2	
11/23: Email from West and call with same 1.0; review revised PG offer and call to West and client .4; emails with D counsel re settlement .1; prepare and revise PG letter .4	1.9	
11/24: Emails with West and JM .2;	.2	
11/29: Email from West re offer and review numerous attachments .7; many emails to and from same re settlement strategy and issues .9; review Widermuth changes .1; review hydrus info .1;	1.8	
11/30: Legal research on issue of failure to include opt out in settlement notice 3.8; prepare and revise brief re same 1.7; review Willis stip .1;	5.6	
TOTAL ATTORNEY HOURS	156.3	

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: October 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
10/1: Participate in PG meeting and memo to file re same 4.2; emails with client .2; emails with WW re taking wood settlement to board .2; emails DZ re motion .1; review motion to subst .1; review and analysis of AV econ impact report and markup same .7; call to Fowler .6;	6.1	
10/4: Email to DE re class settlement approval .1; review MO and email to Walker .1; emails with Fowler .1; review Hoch filing .1;	.4	
10/5: Emails from client and review memo re settlement .3; emails with RWalker .1; email to Trager re class agreement and call with same .5;	.9	
10/6: Review stip re withdrawal .1; review email re Antonovich meeting .1;	.2	
10/7: Call to Fowler re meeting with supervisor and further steps .8; emails with LO counsel re depositions .3; review schedule .1;	1.2	
10/8: PG call 1.2; email D40 on settlement .1; email from Fowler re settlement .1; attention to identifying Oberdorfer input to expert report, summary and review of prior testimony 2.4; commence outline for Oberdorfer and review of data and report 4.2	8.0	
10/11: Emails with EG re settlement .1; review Fowler email and Edwards letter, markup same, and email to Fowler .4;	.5	
10/12: Review numerous depo filings .2; call with Trager .8; emails with LO counsel re depositions and review calendar .3; emails with Reed re cost proposal .4;	1.7	
10/13: Emails with Garner re settlement dragging .2; review depo cost proposal .1; 30+ emails on depo pricing issues .5; analysis and review of Veritext proposal and call with Reed .5; call with client re status .4;	1.7	
10/14: Call with Reed re proposal .2; call with client .2; review supervisor letter and email to DO .1; review email re PWS refusing to share reporting costs .1; 15+ more emails re same .3; emails to LO counsel re Wildermuth .1; email to BBK re refusal to cost share .1; conf with DO .1; email to and from Wellen re costs sharing .2; emails with MF re same .2; many emails with Reed re handling proposal .3; emails with Trager re agreement changes .4;	2.2	

10/15: Review Dunn depo notices and amend memo .2; review and markup client letter to supervisor .2; emails to and from Wellen .2; 30+ emails re handling depositions 1.2; emails with client .2; long email to WW, conf with DO, revise and send same 1.0;	3.0	
10/17: Emails with client .2; email with BH re depositions .1; attention to review and analysis of prior Widlrmuth docs, expert report, and prepare deposition outline for same 4.8;	5.1	
10/18: Review depo notices and amend memo .2; 20+ emails re handling depositions .6; call and email to DE .1; review West letter and call to same re accord .6;	1.5	
10/19: Travel to attend Wildermuth depo 9.3;	9.3	
10/20: Emails with SH .1; emails with Bunn .1; call and email with DE .1; continue analysis and prep for Oberdorfer depo 3.5	3.8	
10/21: Review depo notices .1; participate PG meeting 4.3; summary memo re same .3;	4.7	
10/22: Participate in PG meeting 4.3; supp summary memo .2;	4.5	
10/23: Emails with LO re depositions .1;	.1	
10/25: Emails with client .2; call to West on status of many drafting issues .7;	.9	
10/27: Review RZ reply re willis .2; participate in PG call, memo to file 1.2;	1.4	
10/28: Review and summarize AV econ impact report .7; emails with Fowler re same .2; call to Fowler re numerous issues .8;	1.7	
10/29: Conf with DO re strategy issues .4; call with Fowler .5; prepare long draft letter to EG and email with Fowler re same 1.2;	2.1	
10/30: Receive West input on letter and revise same .2;	.2	
TOTAL ATTORNEY HOURS	61.2	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: September 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
9/1: Emails with client on agreement changes .1; review Waldo status email .1; review 4 cmc statements .2, email to DO;	.4	
9/3: Emails with classmember Reinhard .3; review 2 cmc statements and objection .2;	.5	
9/12: Emails with client on agreement changes .1	.1	
9/16: Review agenda and call in to PG meeting, memo to file 4.2; review and summary of expert notices and memo re calendaring .3; review RK motion for preliminary approval .2;	4.7	
9/17: Review of prop 218 memo and underlying authority .6;	.6	
9/19: Emails re depo notices .1;	.1	
9/20: Emails with EG re settlement .1	.1	
9/21: Emails to EG re settlement .1; email re LO with depositions .1;	.2	
9/22: Review opps to motion for approval .2; email with LO re depositions .1;	.3	
9/23: Emails to RWalker .1; emails with RK re motion .1; email to JD re Joe depo .1; emails with LO re depositions .2;	.5	
9/24: Review supp notice and oppositions .5; email with LO re depositions .1; emails with DZ re motion issues .3; review Rosamond dedesignation and call to DE .1; review West memo and call to same re accord .9;	1.9	
9/27: Call with client re status .6; review Wildermuth Chino report .2; emails with D40 and conf with DO .3; participate in LO call and memo to file re same 1.0;	1.9	
9/28: Email from DE re county status .1; attend LO conf call and memo to file .8; emails with MF re Long Valley .4; review Wright case .3; emails to LO counsel re depo issues .3; email to LO group re Leever depo .2;	1.9	
9/29: Review notice of related cases and online research re same .1; review new depo notices and update memo re same .1; review PG agenda, call to Fowler .8; call with client re status and settlement .4; review West email and PG documents, markup same .5;	1.9	

9/30: Attend PG meeting and memo to file re same 5.1; review and revise settlement agreement and cf with Willis agreement 1.7; email to WW re same .2; review Dunn email on depos .1; review reply papers on approval and supp objection .2; emails with DZ re same .1; call with client on settlement .3;	7.7	
TOTAL ATTORNEY HOURS	22.8	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: August 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
8/2: Attend PG call and memo to file 1.3;	1.3	
8/3: Email from West and call with same .7; email from EG re settlement and re same .3; email to client re same .2; review Antonovich letter and email to West and LO .3;	1.5	
8/4: Emails with Dassler .1; emails with client re terms .2; call to same .2; email to PG re call .1; emails with LO counsel re same .1;	.7	
8/5: Emails with DE .1; long email to client re settlement issues, and redraft language re assessment .7; emails to and from Fowler and BJ re list of parties problems .5; email from West and call to same re drafting .5;	1.8	
8/6: Attorney call re accord and memo to file re same 1.5; long email from client and call to same re settlement issues .6; long email from Blum .1; review long DZ email .1; review Fife comments to accord .1; review accord comments from several parties .3; call with West re same .6;	3.3	
8/8: Emails with BJ and West re parties .2;	.2	
8/9: Email to Blum .1; numerous emails re accord comments .8; email to client re class settlement .3; call with same .8;	2.2	
8/10: Email and call to West re state role .3; email to EG .1; email from West on letter, review agenda and materials for PG call .2; review draft letter and email re change .2; revise class agreement and emails to client re same .7; call with EG and memo to file .5; participate in PG call, and memo to file 1.5; further class agreement revisions and email to client, call with same .6; create new class agreement and modify same 1.3; long email to EG re changes to same .4;	5.7	
8/11: Review BB accord comments .2; emails with DE .1; send comments to West .2; email to EG .2; emails to West and lawyer group re further issues .5; review DE draft brief .2; conf call with accord lawyers and memo to file re same .6; email to West re Robie .4; emails with EG .1;	2.5	
8/12: Sign off on letter .1; emails re call tomorrow .1; email from West re outsiders .1; call from West re accord issues 1.4;	1.7	

8/13: Accord attorney call, memo to file 1.5; call with Trager re Robie .4; call with Bunn .2; email to accord lawyers 1.0; emails with Moore .1; emails to and from Davis .2; emails with Green .1; emails with Trager re Robie .3; email to Waldo and Green re strategy .7; conf with DO .2; email to West re Palmdale .1; emails with Trager and EG re class agreement .1; call with Trager re problems with accord and related issues 1.2; email to and from Green re transferability .2; emails re mediation brief .1;	6.5	
8/14: Modify class agreement and email to EG re same .5; email to BBK re Robie .1; email to DE re brief .1;	.7	
8/16: Emails from counsel re Fowler email .2; review and markup of DE brief .4; email to same .2; review Fife brief and email to same .4; review RK comments to accord .2; email with feds, email to West .1; email to DE re Trager .2; email to Kuhs re accord .2; emails with DE .1; review Trager brief and call to same .4; email to Robie re class .3;	2.7	
8/17: Review PG meeting documents, markup several .5; emails with Fowler re same .2; participate in PG call 3.8;	4.5	
8/18: Participate in PG call 3.8; memo to file re same .4; review KL brief .1;	4.3	
8/19: receive and review Copo brief .2; emails re Siptroth .1; review Cal Water brief .1;	.4	
8/20: Many emails with West and accord lawyers re Robie .5; email from DZ .1;	.6	
8/21: Emails from counsel re Robie .1;	.1	
8/23: Email to West on expert issue .2; call from West re numerous issues for tomorrow .8; emails with EG .1;	1.0	
8/24: Travel to and attend Robie mediation 12.4;	12.4	
8/25: Review Fowler email on PG meetings .1; call to same .3; review West email on letter .1; review and markup of same.3; call to West .5; participate in PG call and memo to file re same 2.1; review Fowler agenda and Robie summary .1;	3.5	
8/26: Call from Bunn and email with same re depositions .2; emails with LO re same .1; participate in PG call and memo to file re same 4.5; emails with EG re class settlement .2;	5.0	
8/27: Emails with EG .1; call with same .1;	.2	
8/29: Email to and from client re class settlement .6;	.6	
8/30: Emails to and from EG re settlement 1.0; revise agreement .3; review cmc stmts .2; long email to client re settlement issues .8; call to same .3;	2.6	
8/31: Review cmc stmts .2; prepare cmc statement .4; emails with West re accord .2; emails with EG and revise agreement .3; long call with Trager re Robie and class settlement 1.3; emails with same .1	2.5	
TOTAL ATTORNEY HOURS	68.5	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: July 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
7/1: Emails and calls with client re accord language 1.8; review opps re expert motion .2; call to RK re same .2;	1.8	
7/2: Emails and calls with client re accord language 1.2; redraft accord sections 1.7; email to Waldo re same .8; call from West re accord issues .8; work on revised language and many emails to and from West re same 3.6;	8.1	
7/6: Email and call from West on fees .4; attention to drafting sections for same, legal research on 1021.5 issues, joint and several liability and good faith 3.9; email to DO re same and Willis fees .2; email to West re accord .6; review court order and email to West re strategy for handling same .4; review agenda .1; many more (15+) emails with West re strategy and handling of accord issues and language 3.2; review transfer order .1; email to PG re strategy .6;	9.5	
7/7: Travel to and attend meeting with West on accord and then PG mediation session 9.3; email to and from LO counsel re strategy .6;	9.9	
7/8: Travel to and attend meeting with West on accord and then PG mediation session 7.3; review Willis reply .2; email to client re Willis .2;	7.7	
7/9: Email from West re watermaster funding .2; research on tax issues on special assessment and feasibility of same 4.3; call to West re same and alternative approaches .7;	5.2	
7/12: Review DE cmc stmt .1; emails and call with West and Waldo re accord handling .6; long email to DE and LO counsel re handling settlement and accord issues .7; review BS markup .1; calls and emails from Lignon re Waldo team conf call .1; email to Waldo on strategy .3; emails to and from LO counsel re handling trial cont .2; conf call with Waldo et al .8; review final accord version and markup of same 1.5; call to West on technical issues .3; review and analysis of 8 technical comm reports from West, and summary of same 2.7; emails to and from DE on continuance and other issues .6; call with Tom Bunn and email to LO group .3; 49 emails (21 by MM) and 6 calls re accord, drafting issues, trial cont, strategy and related matters 3.9; 15+ emails with Waldo group re same 1.9;	14.1	

<p>7/13: Review cmc statements .3; many calls from all counsel re cmc, settlement and cont .9; emails to and from LO group re same .5; emails with US.1; review Fife draft .2; emails to and from DZ re dispute .3; long email to RK and DZ re conflict, trial and getting on board .5; call with LL and JD .7; summary email to LO group .4; further emails with DZ .3; emails with BS re conf call list .2; email to group re same .1; emails to and from West re accord stats .2; 10+ emails on call from Walker and 87% .5; email from West re accord disclosure, emails from 7 others .2; long email to PG re strategy and disclosure of accord .6; review Gene numbers and email to West re same .2; 15 plus more email to and from PG re accord disclosure .4; emails to and from West re same and strategy issues .3; emails to and from Joe F .1; prepare draft MM status decl re settlement and continuance, conf with DO and revise and file same, revise again and refile 3.4; emails to LO counsel re same .2; email to Entrix on billing .1; emails to and from West re call list and disclosure calling .2;</p>	<p>10.9</p>	
<p>7/14: Review PWS and Willis statements, email to DO .2; emails to and from West and PG .3; 50+ emails to and from counsel, LO counsel and PG re disclosure of accord and handling of same, including 4 calls 2.6; draft and revise supp MM declaration re settlement 1.2; call with BB re disclosure and board trouble .5; email to LO counsel re same .2; emails to and from LO counsel re same .2; email comments from West and LO re decl and revise same .3; call with BB re no consent .2; email to group re same .1; email to BB .1; email to PG re AVEK .1; emails with Bjorn re AVEK. 2; conf call with LO and Waldo group 1.2; prepare and revise Waldo decl., emails to all re same .7; emails and call to and from West re same .2; email to Rwalker re decl. .1; emails with Entrix re billing issues .2; email to D counsel re bills and ex parte .1; emails with Bjorn .1; email from DZ on AG opinion and legal research on ethical issues .7; further emails re same with DZ and PG .3;</p>	<p>9.8</p>	
<p>7/15: Emails with RWalker re hearing .1; prepare for hearing .5; hearing re continuance .6; email to Waldo re same .2; many emails to and from LO and West re further steps, strategy for cont. and AVEK 1.5; email to PG re need for lawyers .2; call to MMoore .2; and email all re Robie .2; emails from counsel re same .3; email to RWalker re ex parte .1; analysis re county witnesses and and prepare notice of witnesses 1.0; emails to LO counsel re same .2; attend PG meeting 2.1; review MO n/c; many (3-30+) emails to LO counsel re Dunn stories and AVEK truth, strategy for trial and next hearing 1.3; email to counsel re Robie .2; 15+ emails from same re same .4; emails with Riley .1;</p>	<p>9.2</p>	
<p>7/16: Email with LO re cost sharing .2; emails with Entrix .1; email to LO re court reporting deal .2; email to PG re hearing .2; emails with Trager .2; email to LO re conf call agenda .1; email to all re Robie on 11th .1; emails with Joyce .2; 35 further emails re cost sharing 2.3; emails re Markman .1; emails re lawyer selection for Robie meeting .2; further emails re conf call agenda and strategy .3; long email to DZ re settlement options and Long Valley .6; emails with DZ re same .2; review depo notice and comment to same .1; emails re CCP on experts .3; further emails re lawyer selection for Robie .4; email to and from RK re settlement .2; review new depo notice .1; emails re Wildermuth attack .3; emails with Dunn .1; 8 emails to and from West re strategy for Robie .8; conf call with LO counsel .8; review Willis settlement .3; emails to LO counsel re dealing with same .6; email to West on Willis .1; emails to and from LO re Willis .2;</p>	<p>9.3</p>	
<p>7/17: Emails to and from RZ re settlement .2; email to LO counsel re Willis agreement impact .5; review many emails from counsel .3;</p>	<p>1.0</p>	

7/18: Review 4 strategy emails .1; long email to LO group and West re strategy .7; email from DZ .1; emails with BD re willis .1;	1.0	
7/19: Further emails re Willis settlement .1; many emails with counsel re strategy issues .4; emails to and from Robie .3; review AV article .1; emails re limiting attendance .2; email to LO re accord problems .3; call with West re willis, avek, and accord issues 1.6; call from BBK and email to PG re mediation .1; email to US .1; call from Moore re problem with date email to BBK .1; emails to and from Sloan re willis deal .5; conf call with accord counsel, memo to file 1.2; emails re resting Robie .3; review Chino assessment law .1; emails with MMoore .1; emails re US water use .2; further scheduling emails .1; call with client .4; conf with DO .2;	6.1	
7/20: Emails with Moore .1; review Dassler email and costs memo .1; email to LO re nonpayment problem .1; prepare letter to all parties .2; emails to PG re same .1; emails with Dunn .1; emails with DZ .1; emails re ex parte .2; review draft ex parte .2; emails with JM and Palmdale .1; emails re changes to ex parte .7; review Durbin letter .1;	2.1	
7/21: Call with client re mediation .2; review ex parte .2; further emails re same .3; emails re Waldo contract .2; 15 plus emails re mediation strategy issues .4;	1.3	
7/22: Review PG watermaster documents, and markup same .8; review BB memo .1; participate in PG call, memo re same 3.8; emails with Trager .1; many (15) emails on ex parte .3; emails with Entrix re billing .1; email to and from LO counsel re PG question and Joe S .4; call with Dunn, memo to file .5; emails with Trager .1; 30+ emails re Robie strategy issues .8; review new Waldo contract .1; call to West re accord issues and Robie .5;	7.6	
7/23: Email to Zimmer re depositions .1; emails with DE re ex parte .1; emails with Trager re payment .2; email to Entrix .1; emails re LO call .1; review PWS expert filings .2; review Willis stmt .1; review depo notices and memo re same .3;	.6	
7/25: Review Fife filing .2; email re comments to same .5;	.7	
7/26: Emails with Fife re willis .3; review D40 depo objections .1; review CMC statements and D40 opp to trial cont .2; emails with Entrix on payment .1; email to Walker to take ex parte off .1; emails to and from Arndt re settlement .3;	1.1	
7/27: Prepare cmc statement .2; email to RZ re depositions .1; review motion by US .1; email to non parties .1; emails and call with West re Robie issues 1.2; review email from same and framework .2; review new Waldo contract .1; participate in PG call 1.4; email to LO counsel re PG .1;	3.5	
7/28: Emails with Bjorn .1; review 2 cmc statements .1; calls with DE and TB .3; review motion to strike .1; emails to and from LO re same .2; email to TB re Rosamond .1;	.9	
7/29: Email and call from DE re BBK getting fired and Dunn misrepresentations to court .1; hearing on many matters, memo to file re same 1.2; 30+ emails with LO counsel re strategy and handling settlement going forward 1.3; conf with DO .2; draft letter to BBK, and revise same 1.2; emails with Wellen re settlement .1;	4.1	
7/30: Emails with LO counsel re strategy .2; LO conf call and memo to file 1.1;	1.3	
TOTAL ATTORNEY HOURS	126.8	

TOTAL PARALEGAL HOURS		
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Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: June 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
6/1: Conf call with Waldo and West re settlement .9; review of transcripts, prepare draft opp to transferee motion, conf with DO, revise same 3.6;	4.5	
6/2: Review motion for leave .1, email to DO; review opps of US and Willis .1; review and analysis of new class spreadsheet re inclusions and exclusions .7; emails to and from TB .1; emails with WW and SH .1;	1.1	
6/3: Review Dunn letter, email to Waldo .1; emails to LO re Robie .1;	.2	
6/4: Emails with client re Robie .1; call with BJ re mediation and memo to file .6; call and emails with client re strategy .3; emails with West and client .1; emails to and from D40 re Robie .3; call from West re handling Robie situation .7;	2.1	
6/7: Review agenda and email to client re handling .2; participate in Waldo conf call and memo re same .7; review draft letter and comments to same .4; review reply brief on transfer .1; email from DZ and revise Waldo letter .4; email to PG re same .1; email to LO re same .1; email to US re letter .2; many comments and emails on draft letter .2;	2.4	
6/8: Over 90 emails and 20 calls re PG letter and numerous changes to same 7.1; emails to and from DZ re transferee reply .3; review and post prin. group (PG) letter .1; review Dunn letter and call to Moore .1; email to PG re Robie letter, revise same .6; draft language re small pumper class for agreement tomorrow and email to Waldo .8; email to Moore re mediation .3; email to PG re letter .2; legal research and preparation of objection to PWS brief 1.2; emails with DO re strategy .3; emails from LO group re BBK misconduct .2	11.2	
6/9: Travel to and attend Waldo mediation, and later overliers meeting 9.2; emails with PG .2;	9.4	
6/10: Call from client and email to Waldo .5; update master mediation memo .4; travel to and attend Waldo mediation 5.9	6.3	
6/11: Receive and review new class database and analysis of same, class water use reporting data, and memo summarizing same 4.8; emails to SH re website and database .3; email to AH re class database analysis project .4;	5.4	
6/12: Check stats through website .2;	.2	
6/14: Prepare for hearing .4; attend hearing and memo to file .8; long call with Waldo on mediation issues 1.0; memo to file .1; review and analysis of new class database .3; email to SH re returns .1;	2.7	

6/14: Conf with MM re class database project .4; commence review and analysis of same for identification of non-class members, dupes, and others 6.6	0	7.0
6/15: Check database and email to SH .1;	.1	
6/15: Review and analysis of class DB for identification of non-class members, dupes, and others 7.6	0	7.6
6/16: Call from West re dormant law .3; email to West re Long Valley case .6; emails to and from West re Willis issues .3; email from DZ and email to DO re Willis .1; long email to Waldo re Mojave framework, subbasins and other management issues 1.4;	2.7	
6/16: Review and analysis of class DB for identification of non-class members, dupes, and others 7.1	0	7.1
6/17: Review Dunn letter and order, email to DO .1;	.1	
6/17: Review and analysis of class DB for identification of non-class members, dupes, and others 7.3; email to MM re status .2;	0	7.5
6/21: Review transfer order .1; email to EG and client re settlement .1; analysis and review of class database exclusion analysis and cf with other DBs and data sources 1.1; email to AH re further handling .2	1.5	
6/22: Review March 22 transcript .1; email from West and review agenda .1; long email from West for comments and review and markup memo for current settlement agreement 3.6; emails to and from West re same .8; call with same re draft agreement issues .7	5.3	
6/23: Travel to and attend Waldo mediation, and later overliers meeting 9.2; emails with PG .2;	9.4	
6/23: Review and analysis of class DB for identification of non-class members, dupes, and others 6.5	0	6.5
6/24: Travel to and attend Waldo mediation, and later overliers meeting 9.2; emails with PG .2; status email from AH re class member project .1;	9.5	
6/23: Complete review and analysis of class DB for identification of non-class members, dupes, and others 8.2	0	8.2
6/25: Calls and email from Entrix re payment .2; emails with DO re same .1;	.3	
6/28: Emails with AH re DB project status and questions .4;	.4	
6/29: Emails with West re settlement agreement .8; call with same .4; emails to LO counsel re PG mediation issues .9; review and analysis of class list exclusion analysis and correction to same .7; email to JD re same .2; emails to LO counsel and DE .1;	3.1	
6/30: Review nondeliverable list and email to SH .2; email from West and review and markup of accord document 1.9; emails to and from LO counsel re same .2;	2.3	
TOTAL ATTORNEY HOURS	80.2	
TOTAL PARALEGAL HOURS		43.90

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: May 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
5/3: Review litany of filings re CMO .2; call from Entrix re billing .1; email from West .1;	.4	
5/4: Emails with West and Lignon .2;	.2	
5/5: Prepare draft response to OSC, conf with DO and revise same 1.1; call from BJ and memo re same .6; email from West and review summary .1; call with West re mediation issues 1.1; memo re dame .2;	3.1	
5/5: Attention to entering class Q data into website 7.1	0	7.1
5/6: Telephonic hearing and memo to file re same .9; review MO re same and email to DO .1; phone call from Martin .4; call with West re litigation issues and CMO .5; email to Entrix re payment .1; email to LO counsel re transcripts .1; review 2007 and 2008 transcripts re inter se transfer issue .5; review agenda for meetings, email to client .1;	2.7	
5/6: Attention to entering class Q data into website 7.5	0	7.5
5/7: Research on lis pendens and inter se transfer issues, notice requirements, BFT issues, and constitutional questions, and memo re same 5.8; many emails to and from LO counsel re PWS depos and strategy 1.2; emails to and from SK .1; call to MF .2; email to Waldo re water use and call to West re class dynamics and ballpark estimates .5; emails to and from RZ re strategy .1;	7.9	
5/7: Attention to entering class Q data into website 7.2	0	7.2
5/11: Email to Jim re water use .2; review West email and agenda .1;	.3	
5/12: Travel to and attend Waldo mediation and overlier group meeting 9.2; supplement mediation memo .3;	9.5	
5/13: Travel to and attend Waldo mediation 5.9	5.9	
5/14: supplement mediation memo .4;	.4	
5/17: Email to EG .1;	.1	
5/20: Email from EG .1	.1	

5/21: Email from West .1; emails with DO re settlement .2; email to EG re same .2;	.4	
5/24: Review West agenda and email .1; review latest settlement agreement .6; revise settlement agreement and email to client re same 2.2; call to client .3; further revisions and email to EG .3; call with client .2; emails to and from client .2;	3.9	
5/24: 5/5: Attention to entering class Q data into website 5.0	0	5.0
5/25: Long email to client re settlement 1.2; travel to and attend Waldo mediation 6.4; supplement mediation memo .4; call with client .3; review court order for May 6, email to DO .1; review client settlement markup .2; revise settlement agreement per client comments and email to same .8;	9.4	
5/26: Review D40 transferee motion and review prior pleadings and history re same .3; travel to and attend Waldo mediation 5.8; supplement mediation memo .3; emails to and from West .1; revise client settlement changes and emails and calls to same .6; prepare new draft version and email to EG .4;	7.5	
5/27: Review Van Dam and Grimmway oppositions to transferee motion .2; email to West re basin questions .6; call with client re settlement .2; email and call from West .1;	1.1	
TOTAL ATTORNEY HOURS	52.9	
TOTAL PARALEGAL HOURS		26.8

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: April 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
4/1: Travel to and attend Waldo mediation 6.2; summary memo re same .4;	6.6	
4/2: Email from Fowler and call from same .8;	.8	
4/3: Compare dismissal filing against class database and doe filings .7; email to AH re further handling .2; email from DZ .1;	1.0	
4/4: Emails with DK re strategy .5; emails to and from Fowler .2;	.7	
4/5: Email from Fowler and review follow steps .1, review Qs for attorney and prepare draft response 2.5, and water master concept and prepare notes on prior history with that here and options from other basins 1.6;	4.2	
4/5: Review of dismissal and cross refer to prior analysis and class lists 6.4; conf with MM re same .2	0	6.6
4/9: Review draft agenda, email to Fowler .1; call to same re lawyer Qs and watermaster .8; return calls to three class members and update master memo re same .8	1.7	
4/12: Review MO re Van Dam .1; call with CM Pike re numerous issues .6	.7	
4/13: Call from Fowler re meetings and overlier meeting tomorrow night .8; review mediation memo .1;	.9	
4/14: Travel to and attend Waldo mediation 6.6; attend overlier meeting and summary memo re same 1.4;	8.0	
4/15: Travel to and attend Waldo mediation 6.3; summary memo re same .3; review US request .1;	6.7	
4/16: Email from DZ on breakdown and review expert report to check facts .4; email from Fowler .1; emails from DZ re in rem issues and review Tejon brief .3;	.8	
4/19: Review MO and email to DO .1;	.1	
4/20: Emails and call with class member Leon .5;	.5	
4/21: Email from Fowler and review 3 attachments .2;	.2	
4/22: Email from Waldo and review questionnaire, conf with DO re same .3;	.3	

4/23: Email with client re water use form .1; long email to Waldo re same .9; email from Fowler re issues with LO troubles .1; call from Fowler re further detail on same and background .7;	1.8	
4/26: Email from client, analysis re numbers, and call to same re mediation directions .6; review email from Waldo and agenda .1; commence supp brief re allocation and DQ, review transcripts 2.1	2.8	
4/26: Review of dismissal and cross refer to prior analysis and class lists 5.2;	0	5.2
4/27: Review email from West and two technical working group reports .4; call to West re same .5; email from Fowler and review settlement draft, prepare comments to same .8; conf with DO re brief and revise and finalize same .6;	2.3	
4/28: Travel to and attend mediation sessions 6.7; memo re same .4;	7.1	
4/29: Travel to and attend mediation sessions 5.7; memo re same .3; call with BJ .6; email from Fowler re lit issues .1;	6.7	
4/30: Review filings re CMO issues .2; email from West and review and markup settlement doc .7; review Grimway and Tejon CMO filings .1;	1.0	
TOTAL ATTORNEY HOURS	54.9	
TOTAL PARALEGAL HOURS		11.8

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: March 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
3/1: Emails with SH .1; review Waldo documents .1	.2	
3/2: Prepare supp brief on expert allocation motion, revise same, review documents 1.2; prepare cmc statement .5; email to and from TT .1; review ex parte .1;	1.9	
3/3: Travel to and attend Waldo mediation 6.4; emails from counsel re trial setting .1;	6.5	
3/4: Attention to filing expert corr .1; email to client re status .2; 21 emails to and from counsel re trial setting 1.2; review 11 cmc statements .7	2.0	
3/5: Review CMC statements prepare for hearing 1.1; review Fife reply and research re 170.6 issues .8; review objection by Fife .1; review KL withdrawal papers and conf with DO .2; call to client .2;	2.4	
3/8: Travel to and attend hearing, memo to file 3.7; conf with DO re next steps and writ .3	4.0	
3/10: Review MO and email to Walker re error .1;	.1	
3/11: Email from EG re settlement .1; conf with DO re handling .2; call from BJ .4; email to and from reporter on hearing transcript .2; emails re settlement .1;	1.0	
3/12: Calls with BS and DE and emails to same re Waldo .4; legal research for writ petition 4.8	5.2	
3/13: Review final transcript .2; further research on writ 2.7	2.9	
3/14: Long email to Fowler re settlement issue .7; out of state research to support writ 5.7	6.4	
3/15: Call with Fowler and further emails 1.2; emails to and from client re settlement .2; call to same .4; review settlement agenda and draft agreement .2; numerous emails with PM parties re same .3; review PWS proposed cmo .1; emails with client re settlement .4; review 4 other cmc statement .2;	3.0	
3/16: Calls with Waldo and client re settlement history and planning 1.3; email to Fowler re CA rules on confidentiality .5;	1.8	

3/17: Research on JC website re writ .5; travel to and attend settlement meeting 6.3; email to LO counsel .1;	6.9	
3/18: Prepare cmc statement, conf with DO re same, and revise 2.7; call from Fowler re settlement issues .8;	3.5	
3/19: Review Fife writ .3; further call with Fowler re settlement .5; review draft of writ .9; email from Fowler and review attached documents .3; review order on writ and email to DO .1; review 7 cmc statements .3; review Dunn decl .1;	2.5	
3/21: Email to DO re due process issue .2; research for applicable citations 1.3;	1.5	
3/22: Telephonic hearing and memo to file re same 1.2; call with Joyce re strategy issues .5; email from client .1; call with class member re issue with membership and lawsuit questions .5; long memo from joyce and review water supply assessment summary and records .5; research online regarding same 1.2; legal research regarding applicable law for issuance of will serves and water supply assessments 3.6; emails to LO counsel re 2009 transcripts missing, and review same, email to DO .5; emails to and from client .1; review of writ draft and markup of same .6;	8.8	
3/23: Emails with Fife .1; attention to Entrix billing and emails with PWS counsel .1; review of writ petition .6; emails to and from LO counsel re joint defense issues .4; emails with client re settlement .2;	.8	
3/24: Call from process server re writ issue .1; review waldo email and documents .2;	.3	
3/25: Prepare proposed order .4; review MO re DQ email to DO .1; review transcript and email to TB re expert bills .2; emails to PWS counsel and DO re Entrix bills .4; emals to and from WW and KL re expert bills .2;	1.3	
3/26: Review Joyce email and analysis re Ritter Ranch .3; review of preliminary opp and email to DO .2; email to RK re willis forms .1;	.6	
3/27: Email with DO .1;	.1	
3/28: Emails with client re settlement .2;	.2	
3/29: Strategy emails with RK .1; email from Fowler and review settlement docs .3; attention to handling of writ exhibits .4; call with Fowler re settlement issues 1.4	2.2	
3/31: Travel to and attend Waldo mediation 6.5; memo to file re same .6	7.1	
TOTAL ATTORNEY HOURS	73.2	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: February 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
2/1: Review filings on consol .3; call with RK .4; prepare brief on consolidation .7;	1.4	
2/2: Research for consolidation filing .4; review settlement drafts .7; emails to and from client and email to Randy W on global comments .5; prepare revised settlement agreement .4; email to PWS counsel re same .3; review all briefs on consolidation .5;	2.8	
2/3: Complete consolidation brief .5; attend principals meeting in Lancaster 4.8; 8 emails with WS re settlement issues .5;	5.8	
2.4: Email to WS re settlement .1;	.1	
2/5: Hearing on consolidation and memo to file re same .6; emails with EG re settlement .3;	.9	
2/9: Review and analysis of Gene docs .3;	.3	
2/15: Email to EG .1; review mediator documents .1; email to client re PM .1;	.3	
2/16: Email from EG and client .1;	.1	
2/18: Email from Blum and review case .3; emails to and from client re Waldo .2; emails with RZ .1; email to Waldo .1;	.7	
2.19: Review consol order .2; review minute order .1;	.3	
2/22: Call with DOL re consol order .2; review latest EG draft agreement .2; emails with LO counsel re consol and settlement .2	.6	
2/24: call with client .5; call with DOL .2; letter to Thompson .4; call from same .3; review Thompson proposal and emails to and from DOL .2;	1.0	
2/25: Emails with PM .1; emails with DO re expert issues .4;	.5	
2/26: Review 170.6 filings .2;	.2	
TOTAL ATTORNEY HOURS	15	

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: January 2010

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
1/2: Review and analysis of settlement draft and commence modifications of same 1.6;	1.6	
1/3: Call to client .1; continue drafting of revisions to settlement agreement 2.3; emails to and from client re same .2;	2.6	
1/4: Review emails to and from client, further modifications to agreement .2; emails to and from class members .3; review Paxton emails, watermaster memo, and negotiating docs .6;	1.1	
1/5: Call with client on settlement issues .9; conf with DOL .1; continue revisions to agreement and transmit to client .8; calls to and from class members .5; research on several class member issues .5; emails to and from SH re same .3; emails to Gambone .1;	3.2	
1/6: Email from client and further revisions .6; email to EG re changes to agreement .3; review Paxton email and further settlement docs .4; email to Paxton .1; email to Wonnell re dismissal .1;	1.5	
1/8: Prepare CMC statement .6; emails with Bunn re settlement .1;	.7	
1/9: Emails and call with client .3;	.3	
1/10: Emails with client .1; review CMC statements and letters, proposed order .5;	.6	
1/12: Call from Hedlund .2; review of numerous class member status documents and database info .5; email to Hedlund .1; review various CMC filings .2; review and analysis of proposed order .5; email to RK .1; conf with DOL re same .1; prepare and revise email to PWS .2; call from Weeks .4; calls from 2 class members .3	2.6	
1/13: Review Mettler Valley list .2; emails with SH .1; emails with counsel re conf call .1; emails with SO .3 and LO counsel re consol .3;	1.0	
1/14: Call for meet and confer on consol order .3;	.3	
1/15: Calls and emails with PWS counsel .4; call to and from LL .1; cmc hearing and memo to file .5; emails with EG .1; call from LL .1;	1.1	
1/18: Review Paxton email and five PM files, complete settlement doc .3;	.3	

1/20: Call with Dunn on settlement and consol issues .8; call with DOJ re same .7;	1.5	
1/21: Calls to and from RK .4; conf with DOL re handling settlement .3; emails with client re mediation .2; emails with DE re PM .1;	1.0	
1/22: CMC conference and memo to file re same .7; emails with Dunn .1; emails with counsel re mediators .3; email to all re Waldo .3;	1.4	
1/25: Emails with Dunn and conf call re settlement with same, memo to file .6; review proposed order .1;	.7	
1/26: Emails to LO counsel re our settlement .2;	.2	
1/29: Review RAW comments on global settlement and emails to group and client .3; review EG settlement redraft .2; review willis order .1; review and analysis of PM documents .3; email to group on authority of RAW .2;	1.1	
1/29: Compare recent Doe filings against class list 5.1	0	5.1
1/31: Review AV filings on consol .2; research on judgment issue .4; email to Goldsmith .1;	.7	
TOTAL ATTORNEY HOURS	23.5	
TOTAL PARALEGAL HOURS		5.1

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: December 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
12/2: Long email to Bunn re settlement .6	.6	
12/4: Email to and from Valentine and DR .4;	.4	
12/7: Review Paxton email and PM settlement documents .6; email to Dunn re same .1; long call with Betty Gambone .7; call and emails to and from class members .4; email to Gene re drafting .1; review minutes of PM .1;	2.0	
12/8: Call from 2 class members .4;	.4	
12/9: Many (15+) mails to and from JD, DO, RK and client re settlement issues .6; call from Dunn and memo to file .2; attend PM 3.2	4.0	
12/10: Email to client .1	.1	
12/14: Emails from Gene and Randy re MP .2; review BB questions .1	.3	
12/15: Emails with JD .1; email to Walker re hearing .1	.2	
12/16: Return calls from 7 class members and update master memo 1.9	1.9	
12/17: Review court order re inclusions .1;	.1	
12/24: Settlement email to RK and DO .3;	.3	
12/28: Emails to and from client .3;	.3	
12/29: Emails from DR and Valentine re MTC .2;	.2	
12/30: Review Garner settlement draft .4; emails with client re same .3;	.7	
12/13: Email to Garner re settlement .1	.1	
TOTAL ATTORNEY HOURS	11.6	
TOTAL PARALEGAL HOURS		0

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: November 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
11/2: Call from Lookabaugh and attention to determination of status, return call to same .5; email to Roberts .1; email to Bunn .1; email to RK .1; email to DR .2; emails to DZ .1;	1.1	
11/3: Email to Paxton .1; email to BBK re website .1; prepare for mediation .9	1.1	
11/4: Travel to and attend Robie session 2 13.1;	13.1	
11/5: Call with client .3; call with E Jones re class .4; return calls to 7 class members and update master memo re same 2.2; review and analysis of Willis agreement .3; summary memo re Robie session .4; Call with Sloan .2;	3.8	
11/6: Settlement email to Bunn .4; emails with DO re same and class member issues .3; call with Joyce re writ impact and settlement issues .3; calls to and from 4 class members .6;	1.6	
11/7: Review writ .2;	.2	
11/9: Emails with Bunn re Davis .1; emails with DO and client .2; emails to and from 4 class members re various issues .7; prepare opt in form .3; email to BBK re website .1;	1.4	
11/10: 15 emails with MF, RK and DZ re handling opt ins .5; emails with 6 class members re same; return calls to three class members and update master memo .6;	1.1	
11/11: Emails to and from Paxton re principals mediation session .1; 12+ emails with Garner on ex parte and opt in .9;	1.0	
11/12: Email from Moore .1; call with atty Wooten re CM Mathis .4; emails with same .2; emails with EG .1; emails with 2 class members re Q and lawsuit .3;	1.1	
11/13: Review court order re ad on, emails with EG .1;	.1	
11/14: Emails with client re settlement .4; review Paxton docs .2;	.6	
11/15: Call with client .2;	.2	
11/16: Numerous emails from counsel re Putnam issue .3; review PM settlement documents .4;	.7	

11/18: Preparation and editing of letter to PWS re fees 1.4; emails re DZ re settlement .1; preparation for PM .6; travel to and attend principals mediation session (PM), memo to file 4.5;	6.6	
11/19: Emails with two classmembers .2; return calls to 5 classmembers, update master memo 1.2	1.4	
11/20: Email to JD n/c	0	
11/23: Long call with Valentine and email to DR re same .7; call with Dunn and memo re same on settlement .6; calls to and from three class members .5; email to DR re Valentine .3;	2.1	
11/24: Emails and call with several class members .7	.7	
11/26: Call with R Kuhs 1.5; analysis and review of integrated regional water management plan 1.3;	2.8	
11/27: Legal research on continuing duties of class counsel 1.4; email to DO re same .1; emails with DZ .1;	1.6	
TOTAL ATTORNEY HOURS	42.3	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: October 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
10/1: Review new spreadsheets and analysis re same, call with Roberts .4; email to AH re preparation of final class list .2; emails with RW .1;	.3	
10/1: Review and input class Q responses into web site 3.0	0	3.0
10/5: Emails with KH re status .1; Email from Paxton and review consent form .1;	.2	
10/5: Work on identification on nonclass members 2.6; review and input class Q data into web site 5.0	0	7.6
10/6: Email from Paxton and review 7 attachments, call to client re settlement status .5;	.5	
10/6: Review and input class Q responses into web site 7.2	0	7.2
10/8: Call with RK re settlement and consolidation .3; assessment of revised settlement agreement .5; email and calls to BBK .1; call to Joyce .4;	1.3	
10/9: Emails to and from Moore re settlement .2; call with same re same .6; conf with DOL re same .2; review Santa Maria document and commence revised draft settlement 1.2; emails to and from client .1;	2.3	
10/12: Review and input class Q responses into web site 6.2	0	6.2
10/13: Travel to and attend hearing in San Jose including preparation for same 7.5; conf with DOL on same and settlement issues .2; review 170.6 case law and further research re same 1.2;	8.9	
10/14: Call and email with RK re settlement .2; emails to and from DZ re same .2;	.4	
10/15: Analysis of settlement, attention to drafting revised agreement, and research on judgment and approval issues 1.8; email to PWS counsel re settlement issues .2;	2.0	
10/16: Conf with DOL re settlement problems .3; review Willis document and call RK .2; call to client .1; email to Moore et al re problems with settlement .6; email to and from Sloan re class status .2; emails to and from DZ and RK re problems with settlement .3;	1.7	

10/19: Call with client re settlement issues .6; review latest principals settlement material and email to Paxton .3; review class website and email re modifications to same .2; calls to and from class member on various issues .4; emails to and from DZ .1; calls and emails to and from LL .1; review Paxton email and summaries .2;	1.9	
10/19: Review and input class Q responses into web site 7.5	0	7.5
10/20: Emails to and from LL .2; conference call with LL and Dubois .9; emails to and from various PWS counsel and US re settlement issues .6;	1.7	
10/21: Review of briefs opposing 170.6 .3; legal research re same .3; research and evaluation of class notice and consolidation problems .7; prepare memo on same .4; email to DO re settlement issues .4; emails with D counsel re settlement .3;	2.4	
10/22: Review email from DOL on response to memo and call with DOL re: handling consolidation and settlement .4;	.4	
10/23: Legal research on appellate issue re consolidation .5; review of reply brief on 170.6 and research re same .4; return calls to 8 class members, update master memo 2.5	2.4	
10/26: Calls to and from two class members and email to Dan Roberts .6; research on Metter Valley Mutual and long email to BBK re problems re shareholders on class list .8; calls from 2 other class members .3; email to BBK .1;	1.8	
10/27: Telephonic hearing .8; email to landowner counsel .2; numerous emails to and from DZ and RK re settlement issues .5; call with client .2; email to LL re Robie letter .1; further emails to and from DZ and RK on settlement .5; email to client .1; call from Joyce on procedural issues .4;	2.8	
10/28: Emails to and from PWS counsel .2; email from Moore, prepare draft response to same, and conf with DOL re same .7; emails to and from PWS counsel on mediation part 2 .6; review court order .1; many emails to class counsel re settlement issue .7; further emails with D counsel re Robie .2;	2.5	
10/29: Prepare second settlement conference brief for Robie 2.2; emails to and from DOL and Bunn .2; email to MF et al. re writ .1; calls from class members .3;	2.8	
10/30: Email from client re Robie .1	.1	
TOTAL ATTORNEY HOURS	36.4	
TOTAL PARALEGAL HOURS		31.50

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: Sept. 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
9/1: Review Paxton email and atty rules, minutes .2;	.2	
9/2: Travel to and attend mediation in Sacramento with Justice Robie	15.0	
9/3: Analysis re consol and email to DZ .2;	.2	
9/4: Call with RK and emails to and from RK and Sloan re settlement issues .5;	.5	
9/7: Review Fife letter to McDonald, email to DO .2;	.2	
9/8: Calls to and from various class members, research on issues, and emails to same .7; email to Hedlund re Williamson .1; call from Garner .2; review Roe list and research on status of same .2; emails to and from Sloan re Roes and settlement issues .3; emails to and from Garner and Moore and call to same .2; meeting with DOL on settlement issues .7; review of draft settlement .4; research on basinwide prescription .5; long email to Garner .4; emails with BBK re Does and permits .3; emails to and from three class members .4; many (25+) emails with counsel re settlement 1.0;	5.4	
9/9: Review supp brief on motion to consolidate and analysis re attachments .4; call from Chris Sanders on class issues and sanitation claims .5; numerous calls and emails to and from class members on notice forms 1.2; emails and calls re participating in principals settlement .4; research on 2-100 and preparation of draft consent form .5; emails to from Bunn / Paxton et al. re same .3; emails with B Martin re Q .2; emails to and from reporter re story on AV and call with same .9; email to client re interview .2;	3.6	
9/10: Emails with BBK on website and class .2; conf with DO re settlement .2; return calls to 3 CMs re lawsuit and Q .8;	1.2	
9/10: Attention to class list clean up and identification of nonclass members 6.4	0	6.4
9/11: Emails and analysis re class list problems .5; many emails with DZ and DO re settlement .4;	.9	
9/14: Emails re website changes .3;	.3	
9/15: Emails with LO counsel .1;	.1	

9/21: Review Paxton email, reserved rights, and agenda .2;	.2	
9/23: 10+ emails re settlement meeting and review numerous documents, emails with Paxton .6;	.6	
9/24: Call to court clerk re scheduling .1; conf with DOL on settlement issues .1; call to RK re settlement and consolidation .3; email to BBK re class notice .1;	.6	
9/25: Call to clerk and email to DOL on motion .2; email to Lemieux	.2	
9/28: Emails with DR and BBK re unresolved issues .5;	.5	
9/29: Emails with BBK re notice issue and .6;	.6	
9/30: Email Gar re website issues .2; email to RWalker re DQ .1; conf with AH re Q problems .2; emails to DR and review of databases .3;	.8	
9/30: Review and entry of class member Q responses to website 6.7	0	6.7
TOTAL ATTORNEY HOURS	31.1	
TOTAL PARALEGAL HOURS		13.1

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: August 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
8/1: Emails with Paxton re settlement invite .1	.1	
8/2: Long status email to DOL .5; email to Parris re political issues .6; response to class member emails .4; emails to and from BBK .1; research for opp to consolidation motion 1.4; prepare memo to CM contacts to date 1.7	4.7	
8/3: Call with Evertz and talk with DOL re settlement .5; call from Sloan .3; emails to and from RW re scheduling issues .1; legal research on consolidation issues 1.6; calls and emails from class members .7; attention to response form processing issues .5; emails to and from Roberts et al .4; preparation and revision of opp to motion to consolidate 2.3; review numerous filings of this day .6;	7.0	
8/4: Calls with RK on settlement issues .3; call with TT re protocol and water calculation .4; emails to and from client .3; responds to class emails .2; emails to and from House and Hedlund .4; search database for data .3; emails to and from client .2; email to DE re settlement .2; email to EG re permits .1; return call to 7 CMs re notice, supp memo re same 2.1	4.5	
8/5: Review and analysis of client memo on class visits and call to same .5; emails with DO re same .2; return emails and calls to 14 CMs 2.4; update memo re same .3	3.4	
8/6: Emails with RK re settlement .2; emails with client re class notice issues .3; email to BB re Lane issue .1; many emails with BBK and Leever re DB .3; emails re response forms .1; review RK expert motion and opp .2;	1.2	
8/7: 20+ emails re principals meeting consent issue .6; emails to and from client re water level .5; review 4 motion filings today .3; prepare and file brief on stay .2; return calls from 5 CMs re Q and lawsuit 1.3; update memo re same .2; emails with Orr re settlement, email to DO .2;	3.3	
8/8: Email to Orr re settlement problem, conf with DO .3; email to Paxton .2;	.5	
8/9: Emails re settlement conf .1;	.1	
8/10: Emails re Leever on database problems .3; call with SH re response forms and database .2; emails to and from KL re DQ .1;	.6	

8/11: Call with Bill Leever and memo to file .6; prepare and revise CMC statement .6; emails to and from WL re DQ .4; email to TB re data .1;	1.7	
8/12: Call with Tom Bunn and memo to file .5; calls to and from class members 1.2; attention to issues with response forms .5;	2.2	
8/13: Review 7-24 transcript .2; many (15) emails re mediation .3; call with client re mediation update .4	.9	
8/14: Review KL filings .2; emails and call with client re USGS data .3; emails from WL and court re DQ .1; letter from BB and email to same re mediation .1; return call to 6 CMs re lawsuit and Q, update master memo 1.7;	2.4	
8/16: Review CMC statements and prepare for hearings 2.6;	2.6	
8/17: Travel to and attend hearing in San Jose on 9 items 9.0;	9.0	
8/18: Analysis of class data and email to Dunn et al re same .7; emails to and from Dunn and Hedlund .3; Review draft mediation agreement, research on related issues, and email to PWS counsel re class settlement issues and mediation confidentiality 1.9; long email to BBK re CM issues .5;	3.4	
8/19: Emails and conf with DO re mediation .2; emails with RWalker .1; emails to and from client .2; emails with BBK re class .2; long email to DO re case strategy .7; email to SH re remailing .1;	1.5	
8/21: Commence ex parte papers re class issues .4; preliminary review of USGS well data and maps .4; return call to 6 CMs, and respond to emails from 7 others, update master memo re same 2.2; emails to and from TB .1; review and markup draft mediation brief .4; emails with BBK re PO and records .1;	3.6	
8/23: Drafting ex parte application re class issues .8;	.8	
8/24: Review latest excel database of class responses and emails to and from Hedlund .3; preparation of mdm declaration for ex parte and legal research on class notice issue .8; call with Dunn, Hedlund et al re class notice issues .9; conf with DOL on same and mediation issues .2; call to Zimmer re letter of today, settlement, and case strategy .8; emails to and from court re ex parte hearing .1;	3.1	
8/24: Attention to review and input of class member questionnaire responses into website 7.8	0	7.8
8/25: Call with client on settlement issues and water use .9; complete mediation brief .7; emails to and from client on settlement issues .4; review RK letter and email to DOL re same .1; review Paxton agenda and settlement matrix .2; email to Dunn .1; email to Paxton re need for mediator .2; further settlement email and review attachments .3; emails with client re same .2;	3.1	
8/25: Attention to review and input of class member questionnaire responses into website 7.3; conf with MM re status and questions .3	0	7.6
8/26: Finanize brief and email to MMoore re same .2; return calls to 6 CMs and update master memo 1.4;	1.6	
8/26: Attention to review and input of class member questionnaire responses into website 8.1	0	8.1

8/31: Call with client re settlement meeting .2; respond to two CM emails on notice and Q .3;	.5	
TOTAL ATTORNEY HOURS	61.8	
TOTAL PARALEGAL HOURS		23.5

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: July 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
7/1: Complete and revise letter to Dunn .9; calls to and from RK .2; call to Updegrad .1; brief review of PWS disco responses and instructions to AH re summary of same .5; review JT motion for relief .1; preparation of DQ reply brief sections and editing of same 2.5; email to DO re changes summary .1; email with client re notice .2; email to BJ .1;	4.7	
7/1: Commence preparation of summary of PWS answers to uniform discovery and index of incomplete answers 6.4	0	6.4
7/2: Receive and analysis of new database from SH 1.1;	1.1	
7/2: Continue analysis of small pumper members who are Roe defendants and compare with current class list .5.6	0	5.6
7/3: Emails to and from LO counsel .1;	.1	
7/6: Review and revise FAQ section for website and emails re same 1.2; review website and prepare email re changes .8; emails to and from Fife et al re discovery issues .4; email to House re: additional changes .1; calls from House .2; prepare home page content section .6; prepare short form notice .6; email to Dunn et al re: Roe problems .1; further emails and call with BBK re website .4; email with LO counsel re discovery costs .3;	4.7	
7/7: Emails with client and BBK re case website .3;	.3	
7/8: Calls with Joyce re discovery and Roes issue .3; call from Melnick for Cameron .2; call from Aklufi .1; research on CCP 474 and 583 issues on Roe service .8; ex parte notice .1;	1.5	
7/9: Review Dunn letter of yesterday and email to same .3; call toll free link, and emails to and from DZ and BBK re modifications to same .3; email to JD re suing class members .2; prepare ex parte application and declaration, and revise same 3.2; call with Kim Updegrad .3; email to Hedlund re same .2; prepare notice re bill stuffer .7; attention to fixing website glitches including emails to House, Hedlund, and Goode, and test same .5; emails to and from DOL re DQ and pleadings .2; review draft motion to stay case and long email to Evertz and Bunn .6; emails to client and RK .1; emails and call with Putnam .3; emails to and from 4 classmembers (CM) re handling survey and website issue .5;	7.3	
7/9: Preparation of summary of PWS answers to uniform and index of incomplete answers 6.8; conf with MM .2;	0	7.0

7/10: Calls with Max Z re his 40 properties .3; emails to same re further instruction .2; emails to and from BBK re website .3; court hearing and memo to file re same .5; call to Stephanie H .3; review D40 response to RFP .1; emails with LO counsel re handling consol and discovery issues .3;	2.0	
7/11: Email and call with CM Olsen re suit and property issues .6; long email to and from CM Green re lawsuit and various issues .5; review and comment on bill stuffer .2; review KL letter and conf with DO re DQ .2;	1.5	
7/12: Emails with Green .2; emails to LO counsel re stuffer .2;	.4	
7/13: Emails to and from Kuhs, Fife and Zimmer re class issues .5; review Lemieux letter and filings .2; emails to and from Roberts on summary notice .4; research on prior orders re same .3; review and revise summary notice and email to Robert et al .5; 20+ emails with LO counsel re settlement issues .8; call from to CM re notice .5;	3.2	
7/14: Emails and call with CM Scapillato re lawsuit .5; long email to LO counsel re settlement handling .3; assessment re CM Max Zino issues, analysis of DB and long email to same re properties .6; email to SH re notice decl .1;	1.5	
7/15: Review RK letter .1; review motion to consolidate and Appendix cases, summary of same 1.2; attention to emails with 3 and 2 calls from CMs re notice .6; emails with SH re same .2; many emails with LO counsel re settlement issues .4; email to Dunn re settlement and Does .6; emails with WS re participating in principal meetings .2;	2.7	
7/16: 15 plus emails with LO re settlement, review framework from DZ .4; emails with BBK re website, ads, and Does .3; emails with CM Lytle re notice .2; long email with DR re ads language .5; emails to and from MF re class negotiation .2; calls from three class members re questionnaire (Q) and notice .7	2.3	
7/17: Review stay motion .1; review clerk's notice n/c; emails with CM Lytle .4; emails to and from TB re stuffer .2; long email to KL re conflict and consol, edit same .5; review response to same and conf with DO .2; review settlement matrix .2;	1.6	
7/18: Email re class ad status to DR .1; long call with client re handling settlement conference .6; emails and call with CM Merjil .6; emails to and from Davis re settlement .1; respond to KL email .2;	1.6	
7/20: Emails to and from Hedlund and staff re numerous issues .6; calls to and from Hedlund .3; meet and confer conf call on pleadings and DQ motion etc 1.6; call to RK re class issues .2; emails to and from Dunn re class issues .3; emails to and from Hedlund .1; call with same and House re website issues .5; email to client .1; attention to class member inquiries .8; emails with JD re bill stuffer .4;	4.5	
7/21: Emails to and from House and Hedlund .2; call with Kuhs on pleading issues and motion to dismiss .7; emails to and from client .3; attention to class member inquiries .7; research on DQ issues .4; prepare supp. brief on DQ and revise same .8; finalize summary notice .2; prepare Request for approval of same .3; check and remedy defect in filing of summary notice .2;	3.8	
7/21: Conf with MM re class DB issues .3; KM Review and analysis of class database to determine duplicates, and same household entries, prepare summary of same 8.1	0	8.4

7/22: Review of numerous response forms .4; call with client .3; email to and from BBK .1; emails from MF and DZ .1;	.9	
7/23: Review of numerous response forms meet and confer call with Dunn .6; call with Joyce re consolidation .2; calls to and from class members .7; review Lemieux filings .1; conf call re meet and confer .2; calls to and from class members .6; emails to and from class members .3; review response forms .5; emails to and from Dunn .1; review FAXC .2; review 2006 court transcripts from Dunn re customer issue .9; emails to landowners re hearing issues .2; prepare for hearings tomorrow 1.1; calls and emails to class members .8; emails to and from DOL and LO counsel .2; review motion for appointment of expert .2;	6.9	
7/23: KM Review and analysis of class database to determine duplicates, and same household entries, prepare summary of same 7.1	0	7.1
7/23: AH Conf with MM re handling class Qs .3; attention to returning call and responding to emails of 17 members 3.8	0	4.1
7/24: Travel to and attend hearings on various motions, memo re same 2.5; emails with BBK re notice issue .3; emails with RK and call to same on well permits .3; emails with RK and PWS re mediation w Robiie .3; email to Dunn re expert protocol .2;	3.6	
7/25: Email to BBK re class issue .1; emails re Robie .1	.2	
7/26: Review and analysis of response forms .5; attention to class member emails and calls 1.3;	1.8	
7/27: Calls and emails re mediation date .4; call to Dunn .2; call with RK on settlement and motion to dismiss .5; email to House .2; email to Hedlund .1; revise summary notice and email to Roberts .2; emails to and from counsel re mediation .3; email to Markman re motion to consolidate .2; long call with client on settlement issues .6; email to PWS re expert .3; further emails re settlement .2; emails with RK re Phelan .2; email re motion to consol .1; long email to client re water use issues .6; attention to returning CM calls (9) 1.6; email to JD re expert cost .2;	5.8	
7/28: Emails with two CM re issues .3; email to DR re Updegraff .1;	.4	
7/29: Emails from BD and RK re Robie .3; attention to returning calls and emails of class members (14) 1.9	2.2	
7/30: Call with Roberts .2; call with Joyce .3; attention to handling response forms .4; calls and emails with class members .7; emails from Fife and Dougherty and analysis re same .2; emails to and from Joyce and RK .2	2.0	
7/30: AH Attention to returning call and responding to emails of 22 members, memo re same 3.9; conf with MM re Qs .4	0	4.3
7/31: Call with Joyce on settlement and various motions .6; emails to and from client re settlement .3; calls to and from Evertz re mediation .1; preparation and revision of opp to stay motion 1.5; emails to and from RK .2; emails to and from BBK lawyers .3; review Joyce memo .2; return calls of 8 CMs 1.9; respond to 6 CM emails 1.1	6.2	
TOTAL ATTORNEY HOURS	74.8	
TOTAL PARALEGAL HOURS		42.90

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: June 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails and calls to and from Hedlund and Dunn re notice issues .5; review and revise class notice form .7; prepare proposed order re same .3; emails to parties re same .1; email to Thompson on status .2; review and analysis of class lists and mutual lists .7; conference and instructions to staff re: modification of class lists 1.2; emails to and from Sloan .2; emails to and from US .2; research and preparation of joinder and opposition to motion to dismiss 2.3; email to Lemieux re mutual lists .1;	6.5	
6/2: Revise order and notice for filing .3; call with Sloan .3; attention to handling problems with mutual lists .7; letter to Lemieux and revise same .8; research on conflicts issues .6; letter to Lemieux re same .7; review RK letter and email to same .1; emails to and from Fife .1; calls with client .2; call from Joyce .3; conference with DOL on MSJ and other issues .3; research on MSA on prescription 1.2; letter to Dunn et al on MSA .5;	6.1	
6/3: Review DO draft rogs .2; emails to and from Dunn re well permits .2; conf with Vargas re class list project .3; review preliminary mutual analysis .5;	1.2	
6/4: Review Lemieux letter and further research on DQ issue .5; review court docket for related filings .4; preparation and revision of letter to Lemieux and conf with DO 1.1; call from Lemieux .6; emails to and from LO counsel .4; emails to and from RK and review filings on discovery .4; 15+ emails re mutual lists .7; emails to and from RK re discovery .2;	4.3	
6/5: Research on well permit requirements in LA and Kern Cos, and phone calls re same 2.1; conf with DOL on DQ motion .2; prepare subpoenas for well permits .8; email to Dunn .1; emails to and from Vargas and attention to modifying class lists .8; review filings on Section 731 motion and prepare reply to same .9; emails re boundary map .1; many emails re mutual lists .8;	5.8	
6/5: Work on mutual member exclusion and coding 8.5	0	8.5
6/6: Review of modified class list 1.2;	1.2	
6/6: Work on mutual member exclusion and coding 6.5	0	7.5

6/7: Analysis of class list coding .6; long email to JU re list issues .6	1.2	
6/8: Review filings of Zimmer and email to same .4; emails to and from Walker .1; review Bolthouse objection .1; email to Zimmer re same .3;	.8	
6/8: Work on mutual member exclusion and coding 7.4	0	7.4
6/9: Review opp to motion to dismiss .2; calls and emails with Kern county on well permits .6; emails to Joyce and Zimmer re same .2; modify county subpoena and calls to and from server .3; prepare RFP to County .3; email to Dunn .1; emails to and from Hedlund .1; review new Roes list .4; review AGWA objection .1; emails to and from Fife and call with same re: objections .7; review US objection .1;	3.1	
6/9: Work on mutual member exclusion and coding 7.8	0	7.8
6/10: Revise and file motion to disqualify 2.6; call with Kern County .1; review objections and prepare response to same 1.5; review weeks discovery responses, memo re same .4;	4.6	
6/10: Work on mutual member exclusion and coding 8.2	0	8.2
6/11: Email from client and phone call to same re settlement and stay of case .6; email from TT re notice markup .2; emails re WFF list .2;	1.0	
6/11: Work on mutual member exclusion and coding 7.1	0	7.1
6/12: Prepare for hearing on expert motion and class notice and attend same 1.0; revise and finalize notice .4; emails to and from counsel re same .3; emails to and from MF re WFF .1; emails re bill insert .1; long email to SH re notice .4; email to DO re same .2; email to LO counsel re same .1;	2.6	
6/12: Work on mutual member exclusion and coding 6.3	0	6.3
6/14: Westlaw public records research to determine ability to clarify shareholder status for mutuals on lists 2.0; emails to BS and Do .2;	2.2	
6/15: Call with Kuhs .7; emails to and from court .1; assessment on timing for expert protocol .2; email to Leininger .1; call with Sloan .4; emails with Walker .1; research on defensive class action issues and review of court docket .6; preparation of response re motion to dismiss and revision of same 1.5; real property research on class member lists 1.5; calls and email to and from Vargas re: work on class lists .7; work on website content .7; email to Hedlund re same .4; emails to counsel re bill insert .2;	7.2	
6/15: Work on mutual member exclusion and coding 7.6	0	7.6
6/16: Analysis of bill stuffer and website issues and emails to Hedlund and counsel .5; call with Logan and memo re same .4; call with Hedlund .1; call with Bunn .2; analysis re defendants and answers and research on court web-site .5; conf call with Hedlund .7; review RK response on mtn to dismiss .2; analysis re MSA and conf with O'leary re same .4; legal research on MSA and motion in limine issues re prescription claim .7; call with Hedlund and House .9; calls and emails with Hedlund and proofread and revise notice for printing 2.3; calls and emails to and from Vargas re class list issues .5; review third mailing list database and pumper forms from Willis class .3; emails to and from Bunn .1; review website .2; emails from BD .1;	8.1	

6/16: Compare Mutual Water Company Lists names and addresses against class list and annotate same 7.7	0	7.7
6/17: Complete FAQ section .7; emails to and from Hedlund and call from same re class lists .5; emails re website .2; email to and from House and test email issue .1; confirmation testing of email and website issues .3; calls and emails to and from Vargas re completion of mailing lists and review last list .3; emails to and from court .1; evaluation of well permit data and email to Kern Co .2; status email to Thompson .2; prepare notice of final changes to class notice .3; review notice proofs and emails re changes .8; call with Hickling .3; email to client .1; emails to Dougherty .1; emails to and from Blayney lawyer .1; research on prescription claim MSA .8; review RK stip and emails to and from on modifications .1; attention to numerous tasks re class notice, review of lists, website 3.6	8.8	
6/17: Compare Mutual Water Company Lists names and addresses against class list and annotate same 7.0	0	7.0
6/18: Review revised mailing proofs and email to Hedlund .2; conf with DOL re handling hearing on mtn to dismiss .3; review of US and Borax supplemental briefs .7; call with DOL re same .3; review final version of notice markup and email to Hedlund .5; call to DOL re possible solutions to general adjudication problem .3; call to Dunn .1; review of prior filing on defense class and analysis re handing jurisdiction issues 1.5; email to Dunn and Garner .3;	4.2	
6/18: Compare Mutual Water Company Lists names and addresses against class list and annotate same 7.4	0	7.4
6/19: Call with RK .3; research on defendant classes and requirements form same 1.2; calls to and from Lemieux .4; prepare for hearing .3; attend hearing .6; call with Sloan .4; email to Hedlund on notice .1; call to Dunn .1; conf with DOL re DQ motion and procedural problems .2; review and analysis of long KL letter .5; emails to and from LO counsel .4; review court order and email to R Walker re error .1; emails and call with client .5; emails to and from Bunn on bill stuffer .2;	5.3	
6/19: Compare Mutual Water Company Lists names and addresses against class list and annotate same 2.7	0	2.7
6/20 Emails to and from RZ .1;	.1	
6/22: Landowner conference call 1.0; extensive analysis of prior filings and pleadings and commence preparation of summary of same 7.2; calls to and from DOL re DQ and issues for consolidation .4; call from class member .2; numerous emails to and from LO counsel .4;	9.2	
6/22: Continue work on editing, cleanup and checking of class database 8.1; conf with MM re same and questions .2;		8.3
6/23: Call with Tootle .7; emails to and from Dougherty .1; continue analysis re prior filing relevant to DQ and consolidation .7; conf. With DOL re DQ and case strategy issues .5; call from Lemieux re DQ .2; email Moore .1; research on LASC website re prior filing .4; same for Kern County .1; evaluation re class notice .5; emails to and from Lemieux .1; brief research on consolidation .4; email to Hedlund .1; preparation and revision of long letter to purveyors and continued analysis of prior filing for same re major issues with case posture 6.2; email to Joyce and Zimmer for help with same .2; emails to and from RK .1;	10.4	

6/24: Call with Joyce on prior case events and strategy for settlement .7; emails to and from Kuhs .1; long email to DOL on case strategy .5; prepare notice .4; emails to and from Bunn .2; call with same .7; call with Sloan and Zimmer re settlement, trial, motion to dismiss and classes and possible physical solution .9; call from Rebbecca Bon for Boron .1; commence review of 12/5/05 transcript .2; review hearing transcript from 2/17/06 and related orders re status of pleadings .5;	4.2	
6/24: Continue work on editing, cleanup and checking of class database 6.9; conf with MM re same and questions .5;		7.4
6/25: Substantial revision to long letter and completion of analysis of pleading defects for same 4.5; email to LO counsel re same .1; emails to BJ .2; email with Walker .1; emails with SH re notice .1;	5.0	
6/26: Call with Joyce re letter and Doe issues .3; research on impact of wrong summons on defaults .4; call from Kuhs re handling class, US, and pleadings .7; conf with DOL on DQ and letter and case strategy .4; emails to and from KL .3; research on Doe issues and CCP 583.210 1.2; revise and finalize letter to Dunn et al .8; review of prior hearing transcripts for DQ reply 1.0; review Fife email on Hedlund and class website / email to RK .1;	5.2	
6/22: Further work on editing, cleanup and checking of class database 7.3; conf with MM re same and questions .2;		7.5
6/27: Review cases on section 474 and 583 re Does .6; long memo to DOL, BJ, and Kuhs re analysis and handling of this issue 1.0; emails to and from DOL on points for reply brief on DQ motion .5;	2.1	
6/28: Emails to and from DOL re reply and pleadings .4; review chart from Kuhs .1; emails to RK on strategy issues .3; emails to and from DZ .3;	1.1	
6/29: Call with Sloan re handling motion to dismiss .5; emails to and from Hedlund .1; emails to and from RK and DZ re class issues .2; review and markup of reply brief .6; email to BJ et al .1; review revised proofs .1; email to and from Sloan .1; call to Leininger .2	1.9	
6/30: Call with DOL on Roe problem .2; analysis of Willis pumper list and Roe list .3; commence letter to Dunn re service problem .5; several dozen emails with LO counsel re class and litigation issues 1.3;	2.3	
TOTAL ATTORNEY HOURS	115.7	
TOTAL PARALEGAL HOURS		108.4

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: May 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
5/1: Calls from 2 potential class members .3; prepare response to motion to decertify, conf with DO and revise same 1.8; long email from Moore .1;	2.2	
5/2: Travel to and from Antelope Valley for survey of class list properties with client 6.1; emails to and from client and DOL .5; emails to and from Ukestad and Dougherty re mutuals .3;	6.9	
5/3: Emails from client .1; review of four databases and research on property indentities 1.8; download and review photos, cross reference vacant properties on class lists .3; letter to Moore 1.8	4.0	
5/4: Drafting MDM declaration and ex parte re halting class notice 4.6; revise Moore letter .3; emails with client .1; landowner conference call .7; calls to and from Moore .6; prepare Wood declaration and email to same .2; calls to and from High Desert re pump .2;	6.7	
5/5: Prepare ex parte application 1.5; emails to and from Dougherty et al .1; email to Moore .1; meeting with Moore and Dunn 2.4; emails to and from client and DOL .3; prepare stipulation and order on notice and transmit to Dunn and Moore 1.4; call with Dunn and emails to and from Moore .2; research Justice Robie .3; prepare VSC statement .3; call with Lancaster Water president .2;	6.8	
5/6: Prepare for hearing .3; participate in conference call .6; emails to and from client and DOL .4; emails to and from Dunn and Moore .4; email to Thompson .2; call from class member .3; redraft notices .6; emails to and from Hedlund, Dunn, John U, Moore, Fife, Lemieux 3; email to DOL on task list .2; email to TT and Dunn re pumper questions .2; review Willis spreadsheet . 2; review court orders .1;	3.8	
5/7: Call to Dunn and email to DOL .2; review of cases on control of EC 730 expert .4; meeting with DOL on case strategy .3;	.9	
5/8: Review small pumper Willis forms and cross reference with spreadsheet .8; conf with DOL re notice changes and review same .2; call with Dunn and email to landowners re expert .3; call with Kuhs re expert .2; call from Thompson and email to Dunn .2; review Thompson changes and email to Dunn .2;	1.9	
5/11: Emails to and from D counsel re meeting .1; emails to and from Dunn .1	.2	

5/12: Prepare expert cost allocation motion 1.8; many emails to LO counsel and JD re expert .6;	2.4	
5/13: Call from Dunn .2; research and analysis on opt in issue 1.0; emails to and from Fife and review his comments .2; phone call from class member .2; email from Mutual and respond to same .5; emails to and from Fife .3; emails with Walker .1; many emails re lists for mutual .8; email to Boyd re notice .1;	3.4	
5/14: Emails to and from Garner et al on class problems .2; emails to and from John U .2; many emails to counsel re class notice issues .2; email to Walker .1;	.7	
5/15: Conference with DOL on notice problems .1; all to Garner .1; analysis re handling other mutuals on list .3; emails to and from Zimmer .1; review Sheep creek motion papers .5; many (20) emails to counsel re class issues .9;	2.0	
5/16: Draft email to Dunn .4; emails with JU .1; email to and from DO re class issues .3;	.8	
5/18: Prepare ex parte application to stay class notice 3.8; email to DO re PO .1; email to LO counsel re discovery issues .4; emails with client and DO re notice .2; call from Dunn, memo to file .3;	4.8	
5/19: Many emails re settlement and review RZ matrix .3;	.3	
5/20: Hearing on motion and memo re same .4; 15 emails with counsel and parties re class notice and mutual lists .6;	1.0	
5/21: Emails to and from Dunn .1;	.1	
5/24: Emails to counsel re shareholder lists .5; review PO re lists .3;	.8	
5/26: Prepare subpoena to WFF .3; research on public records and attention to service instruction on same .3; emails and from Fife re WFF .3; emails with Dunn .2; emails with client .2; email from TT .1; review MF comments on notice .1;	1.5	
5/27: Revise small pumper notice and questionnaire 1.4; prepare proposed order re same .2; email to Dunn re notice .3; emails to and from client .3; many emails with counsel re notice .6; email to Dunn re list problems .1; emails with LO counsel re settlement .3;	3.2	
5/28: Calls with Dunn and client .7; review motion to dismiss XC .3; finalize PO .1; attention customer list, email to counsel .2;	1.3	
5/29: Call with Dunn and Leininger, conference call with court 1.4; call to DOL .2; email to and from DO re motions .2;	1.8	
5/30: Emails to and from client and DO .2; emails with JU re lists .1;	.3	
5/31: Emails to and from client on Nebeker meeting .3; emails with client re GN issues .1; review mutual lists and cf with class list .4;	.8	
TOTAL ATTORNEY HOURS	58.6	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: April 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
4/1: Preparation of proposed order .5; review filings and prepare for hearing on TRO 1.1; call with Zimmer .2; review and analysis of current version of group discovery .6; email to client .1;	2.5	
4/2: Travel to and attend discovery meeting 3.6; hearing on TRO .5; call from Jim Nye .2; call from client .1; call with Zlotnick .2; email to Moore et al. .1; email from Garner .1;	4.8	
4/3: review minutes from LADWP stakeholder meeting .2;	.2	
4/6: Emails to and from Fife and Zlotnick .2; call with Dunn and memo re same .8;	1.0	
4/7: Emails re settlement issue .3;	.3	
4/8: Letter to Dunn .4; call from Lemieux and research on Nebeker anti-class publications .8; emails to and from Dunn .3; long email from client .2;	1.7	
4/9: Call with client on settlement issues .5;	.5	
4/11: Review Fife email on meeting .2; email from Fife re Nye .1;	.3	
4/14: Emails to and from RK re handling expert motions .3;	.3	
4/15: Review revised uniform discovery .4;	.4	
4/16: Emails and call to and from Zlotnick and Kalfayan .2; prepare status declaration including review of file materials .7; review opposing papers and other filings re expert motion and preparation of reply brief 1.0; email to clerk re TRO .1;	2.0	
4/18: Emails re discovery .1;	.1	
4/20: Email to Dunn .1;	.1	
4/21: Review uniform discovery to PWS .2;	.2	
4/22: Conference with Leineger re settlement 1.5; email to same .1; conf with DOL re hearing and settlement .3; emails to and from Aluki re class member .3;	2.2	
4/23: Review JD decl .1;	.1	

4/24: prepare for and attend hearing on expert motion, jury trial, and other class issues 3.0; review court orders and preparation of order re expert motion .3; review answer and XC of Joyce .2; status email to TT .1;	3.6	
4/27: Preparation of order re class notice service .3; landowner conference call .6; call from RK .2; conf with DOL re strategy .2; emails to client .1; email to BBK re class list .2; review AVEK draft .2;	1.8	
4/28: Calls from several class members and counsel re hearing .5; emails with BJ .1; review class list .4;	1.0	
4/29: Emails to and from Hedlund .1; t/c call with Hedlund and Dunn and conf with DOL on doubling of class size 1.1; calls with client re same and settlement .7; calls from landowner counsel re VSC .4; 15+ emails with LO counsel re VSC issue .9; long email to client .1; email to BBK re class notice .4;	3.7	
4/30: Call from Fife .2; emails to and from clerk .1; prepare draft of Dunn letter 2.1; call with Dunn .1; call from Sloan .2; emails to Dougherty and client .3; calls to same .1; calls and emails with client .4; emails to and from Welker .1; review transcript of last hearing .2; review joinders and Fife motion .5; revise Dunn letter .4; review ex parte to decertify .3; legal research on Fife standing to decertify 1.3	6.3	
TOTAL ATTORNEY HOURS	33.1	
TOTAL PARALEGAL HOURS		

uyLaw Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: March 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
3/1: Emails from BD, RK and Fife re notice .2;	.2	
3/2: Emails to and from LO counsel on class issues .2; call with Joyce .4; review Reply of Bolthouse .1; conf. call with LO counsel .9; research on issues related to potential withdrawal .8;	2.4	
3/3: Review minute order .1; meeting with S. Reed of Veritext reporting agency and analysis re: online web site for future depositions .7; review RK expert motion .2;	1.0	
3/4: Emails to and from RK and DZ re: class issues .4; prepare letter to purveyor counsel, circulate same, and finalize .5; review cases on Evid code 731 and 730 and prepare for hearing tomorrow 1.5; emails to and from LO counsel re: common discovery and CMO .4; work on PMK depo notices .3; review US opposition to motion .1; many emails to LO counsel re strategy issues .5; review US opp .1;	3.8	
3/5: Fly to San Jose and argue expert motion and conference with Dunn re class notice and settlement 7.3; numerous (15+) emails with LO counsel and DOL re further handling of small pumper class .5; conference call with Dunn and Garner re settlement .3; review order and email to court on error, review new order .1; email to Garner re settlement .2; email to client .4; many (20+) emails with LO counsel re settlement and class issues .6;	9.4	
3/6: Call to Dunn re settlement .1; emails to and from LO counsel re discovery and common defense issues .2; call to Thompson re renewed motion .1; review and markup of uniform discovery .5; emails to and from DZ re expert .2	1.1	
3/8: Emails with RD re class issues .1; emails to and from client .2;	.3	
3/9: Emails with LO counsel re class issues .2;	.2	
3/10: Call from RK .3; read Ronert park case .3; email to LO counsel on discovery and CMO .5; call with Joyce on discovery meeting .2;	1.3	
3/11: Review Veritext proposals .2; email to counsel re same .3; emails to and from Fowler re mediation .3; emails with Garner .1; email to Walker .1;	1.0	
3/12: Emails re discovery with LO counsel .2; review RD discovery .1;	.3	
3/13: Review approval of revised class notice .1;	.1	

3/18: Review uniform discovery .3; emails from LO counsel re same .2;	.5	
3/19: Emails to and from DZ re Fife issue .3; email to and from Fife re town council issue .6; emails with DO and DZ re handling same .5; email to PWS re Fife issue .2; many more emails with MF and DZ re common client problem .6; review Bunn discovery .2; review handouts for meetings .1;	2.5	
3/20: 30 emails to and from DZ, MF, client, RK re ethics and class member contact issues 2.1; email to and from suppliers counsel .1; call from Weeks .2; research on contacting class members post certification without class counsel consent 1.5;	3.9	
3/21: Emails with DO and Willis counsel re Fife issue .2;	.2	
3/22: Conf with DO re handling MF meetings .2;	.2	
3/23: Preparation of draft settlement agreement 4.7; emails to and from clerk on ex parte .1; call with Kalfayan .2; emails to DO re settlement issues .3; emails with Dunn re meeting and MF .5; emails with BW re meeting .2; review KL letter .1; email to client re Gene .1; email to BBK re settlement .1;	6.3	
3/24: Settlement meeting 3.5; research on ethics issues with Fife solicitation .6; emails with client re AGWA .2; emails to and from BW re same .1; email to Reed re proposals .3;	4.7	
3/25: Research on appellate issues affecting possible settlement .7; emails to Joyce and review coordination order .1; prepare and revise settlement demand letter to Moore 2.2; conf with DOL .2; email to and from Garner re larger pumpers .3; emails to and from DO re class problems for settlement .4; review coord order .1; email to TT re status .1;	4.1	
3/26: Call with Dunn re settlement .3; conf with DoL .2; emails to and from Garner .1; analysis re settlement issues .3; call with client on settlement .3; redline Entrix proposal and call to TT re same .6; prepare TT declaration .5; revise settlement letter .2;	2.5	
3/27: Emails to and from client re settlement .3; call with Dunn re same .4; modify letter to Moore and email to Dunn and Garner .5; calls to class members re Fife meeting .2; call with Joyce .2; analysis re handing future fees in settlement and conf with DOL .2; calls to class members re: Fife meeting in February .3;	2.1	
3/30: Revise Moore letter and email to Dunn/Garner .3; call with Wayne Scott .1; call with Jim Nye .5; emails to and from Garner and Dunn .4; attention to ex parte .2; preparation of renewed motion to appoint expert and supporting declaration, review Olsen case 2.9; finalize Moore letter and send same .9; emails with DO re motion .2; preparation of ex parte app for TRO .5;	6.0	
3/31: Email to Moore et al .1; research and preparation of ex parte motion on TRO re AGWA and MDM declaration 3.5; emails to and from Fife and DO re TRO .3; review PWD discovery responses .4; emails with RGK .1;	4.4	
TOTAL ATTORNEY HOURS	58.5	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: Feb 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
2/1: Call with client re decl. .2;	.2	
2/2: Review 2 postings .1; emails to and from landowner group re Anaverde and conf call .2; call with Dunn and Hedlund and memo re same .6; landowner conf. call .5; prepare Wood declaration .5; email to RK re depo group deal .1; call from class member .1;	2.0	
2/3: Emails and call with client .3; emails to and from Court .1; revise Entrix proposal .5; email to RK re docs .1; emails to and from Waldo and Fowler re settlement .3;	1.3	
2/4: Review revised Entrix proposal and call with Thompson .2; call with client .2;	.4	
2/5: review and execute stip from Sheep creek .1; calls with to AV landowners re small pumpers class .2; brief review of rough class database .3; commence motion for appointment of expert, including legal research on section 730, 731, self-help, 1021.5 4.8	5.4	
2/6: Analysis of database for class notice .2; call with Hedlund re same .7; email to John U .1; review and summarize 3 prior water adjudication judgments for application to proposed settlement in Wood case 2.4; long call with RK on website problems and other class issues .5; emails to and from same re notice errors .2; further legal research for expert motion 1.4	5.5	
2/8: Emails to and from Dougherty .1; email from Fife .1;	.2	
2/9: Modify Wood declaration .2; call with same .2; prepare and revise Thompson declaration .5; phone call with same .3; review proposed joint discovery .4; conf call with LO counsel .5; email to court .1; complete motion for appointment of expert 5.2; email to RK re website .1; prepare Doe amendment .1; email to Lemieux .1;	7.7	
2/10: Analysis of PRA request for info to support 1021.5 motion .4; commence letter to PWS re settlement 1.4; review PWS supp jury trial briefs and research re same .7; review draft joint RFPs from RK .3; email to court re website problems .1;	2.9	
2/11: Emails to and from LO counsel re sheep creek motion .1;	.1	

2/12: Extensive revisions to settlement letter to PWS counsel .6; email to Dunn re outstanding agenda .1; emails re discovery conference .2; call form class member .2;	1.1	
2/13: Long call with Lemieux re settlement .8; review existing settlement proposal in this case .2; email to LO counsel re handling of joint discovery .3;	1.3	
2/15: Call with client on settlement analysis and case prep issues 1.0;	1.0	
2/16: Revise class notice 1.8; emails to landowner counsel re expert motion .3; email to Dunn and Bunn re notice .1; emails to numerous LO counsel re settlement .3; email to RK .1;	2.6	
2/17: Emails to and from Dunn .1; emails to various landowner counsel .1; review and prepare comments on revised joint discovery 1.5; conf call with Dunn, Bunn and Hedlund and revise notice .8; email to DOL .1; email to Fife on class issues .1; calls with 2 landowners .3; call with S. Reed re: joint depo cost proposal .3; email to and from Fife re opt out .2;	2.0	
2/18: email to and from Hedlund .1; conf call with Heldlund and IT re website and email to DOL re same .6; revise notice .4; emails to and from Fife and DOL on expert issue .2; emails to and from Zimmer re settlement proposal .2; revise class notice and finalize same .4; emails to and from Haynes re website .1; emails to and from Fife re joinder and review same .2;	2.2	
2/19: Call with client on settlement issues .6; analysis re handling exemption and enforcement issues, and email to Dunn et al. re settlement issues .7; review latest round of revised joint discovery .7;	2.0	
2/20: Review CMC statements .1; commence CMC statement .3; emails to and from BBK re testing website .2; review Dunn Decl and opp to expert motion .3;	.6	
2/22: Commence research re reply on expert motion .5; review Nebeker email re settlement .1;	.6	
2/23: Complete CMC statement draft 1.2; review dunn declaration re class service .1; email to purveyors counsel .1; call with Dunn and Hedlund .2; emails to and from defense counsel .2; review AGWA and email re same .1; supplement and revise CMC statement .5; call with Bunn and revise CMC statement .4; commence review of PWS docs forwarded form RK 1.6;	3.8	
2/23: Prepare summary of D40 records, PWD records 7.1; conf with MM re same .3	0	7.4
2/24: continue review of PWS docs 2.3; research on Section 730 including review of three cases cited in PWS opp 1.0; commence drafting of reply brief 1.1; emails to and from PWS counsel re settlement call .1; review Anaverde CMS and email to Huang .2; call from class member .2;	4.9	
2/24: Continue summary of water supplier records 8.5	0	8.5
2/25: Conference call with PWS counsel re settlement and expert motion .7; continue drafting reply brief .3; review AGWA jury reply brief .2; commence preparation of content for website .3	1.5	
2/26: Complete reply brief on expert motion 3.7; phone call with class member Lawrence .5; review CMC filings .1; review Willis CMC statement .1;	4.2	

2/27: CMC telephonic 1.2; email to water counsel re settlement .1; emails to and from DZ and RK and JD .1; email to and from client .1;	1.5	
2/28: Prepare and file proposed order .2; review Dunn letter .1; continue review of purveyor documents and summary of same 3.9	4.2	
TOTAL ATTORNEY HOURS	59.2	
TOTAL PARALEGAL HOURS		15.9

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: January 2009

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	AMOUNT
1/1: Emails to and from landowners .3; review older water cases for information on jury trial issue 1.2;	1.5	
1/2: review CMC statements and purveyor brief re jury trial .4; prepare CMC statement and modification of DOL insert on jury trial, including research re same 1.5;	1.9	
1/5: Attention to responding to court' request for jury trial issue .2; email and call with Waldo, mediator .1;	.3	
1/6: Email to R. Walker .1; numerous emails to landowner counsel .2; additional research on jury trial issue and prep for hearing 1.2; call with purveyor counsel re: class notice .3; calls from 2 class members .5; call with Hedlund .7;	3.0	
1/7: Emails to and from landowner counsel .2; participate in LO conf call .7; email to Waldo .1; revise class notice and email to Dunn and Bunn .4; email to LO counsel re: motion for preliminary injunction problems .3; emails to and from Kuhs .1; call with Leggio and email to same re mediator Waldo .4; review and analysis of avgroundwater website and email to RK re problems .4; revise and file class notice .1; call with client .5;	2.7	
1/8: Email to and from clerk .1; research re small pumpers who have received the Willis notice, including email with client .5; phone calls from 3 class members .5; review objection to notice .1; call form class members .3;	1.5	
1/9: Prepare for CMC including legal research .8; call from class member .2; emails to Dunn and RK re problems with boundary map .2; emails from LO counsel on jury issue .1; attend CMC 2.5; call with class members 1.3; emails to and from Dunn .1;	5.2	
1/10: Emails to and from Zimmer .1;	.1	
1/12: Research on website emails to RK, Bunn and Dunn re problems with boundary .8; call from class member .2; review minute order .1; research and interviews with potential experts 2.7;	3.8	
1/13: Email to and from Kuney .1; phone call with client .3; continue research and interviews for potential experts in 3 areas 3.2;	3.6	

1/14: Emails to and from Dunn on Leever .1; emails to and from Fife and Thompson re expert retention .2; phone interview with Thompson .6; research on ethical issue of same person in both classes 1.8; email to DZ and RK re same .2; review Lemiux letter .1;	3.0	
1/15: Emails to and from LO counsel .1; call with Thompson .4; review Thompson CV .2;	.7	
1/16: Call with Fife .5; review settlement proposal, phone calls re same .4; talk with DO re settlement proposal .1; call with client .4; email to leggio and green .6; emails to and from client and DO .3; emails to and from Thompson and Fife .2; emails with Dunn .1;	2.6	
1/18: emails from DZ and Hedlund .1;	.1	
1/19: emails to and from Thompson .2; calls to and from five class members .8;	1.0	
1/20: Emails to and from Dunn .1; call with client .2; review several filings of this date .2;	.5	
1/21: Legal research on self-help .7; review settlement proposal and call LO counsel .2; call with Dunn and email re same .3; numerous emails from discovery meeting handling .3; preparation of matrix of discovery propounded and not fully answered 1.5; prepare rough list of categories of comprehensive discovery .7; call with Thompson on budget issues and case handling .8;	4.5	
1/22: Call with Thompson on budget and scope of work .5; call with LO principals on settlement issues .2; prepare for meeting at Wildermuth, including review of declaration and database files .8; travel to and attend meeting 3.8; memo re same .4; review first draft proposal by Thompson .1;	5.8	
1/23: Conf call with landowner principles .7; research on correlative rights .5; email to expert .2; analysis of water district boundaries on internet against basin boundary and email to counsel re export of water 1.4; call with Joyce on jury trial issue .4; emails to kalfayan .1; analysis re handling Phelan CSD .2; research on use of water outside basin on prescription claim and potential for prelim. Injunction against same 1.1;	4.6	
1/26: Legal research on jury trial and issue related to purveyors brief 3.4; supplement and edit brief 1.6; review of other landowner briefs .5; prepare for discovery meeting, including preparation of chart of pending discovery 1.6; calls with 2 potential small pumpers .3; emails to and from Lawson .1; email to clerk re website trouble .1; calls to and from several class members .7	8.3	
1/27: Travel to and attend discovery and case management meeting, and meeting with landowner counsel thereafter 4.6; email to Huangfu re: landowner group .3; review draft CMO .2;	5.1	
1/28: Review RK letter and last hearing transcript .2; call with client on last settlement meeting .3; call with three class members .7; calls to and from several class members 1.2;	2.4	
1/29: Email to PWS counsel re depo costs splitting .2; emails to Lemiux and Bunn re settlement .3; review settlement proposals .3; emails to and from Dunn re Leever meeting .3;	1.1	

1/30: review RK letter .1; emails to and from Dunn .1; call with six class members 1.2; research and analysis on motion for preliminary injunction, specifically public use doctrine in water taking context 2.4;	3.8	
TOTAL ATTORNEY HOURS	67.1	

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: Dec 2008

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	AMOUNT
12/1: Emails to and from Zimmer re water production .1; review and summary of discovery responses for information on historical purveyor production and overdraft status 1.7; analysis re Sheep Creek motion .3; call with client re injunction motion .2; call with Joyce .2; call with Sheehan .9; listen to Ariki interview online .7; finish review and summary of IRWMP and related docs .4;	4.5	
12/2: review and summary of pleadings for allegations on overdraft status 1.1; call with Judge Cahill's assistant re mediation .2; email from client .1; evaluation of Leroy Simons as potential mediator, including emails to landowner counsel .3;	1.7	
12/3: Research into John Cherry as potential expert and emails and calls to same .6; emails re handling Sheep Creek stip, review and execution of same .3;	.9	
12/4: Research and analysis of potential experts for small pumpers group 2.4; review documents on 3 proposed Willis experts .2; emails to and from David Watson .1; emails to Cherry .1; internet research for information on planned development of wells and new production by purveyors 1.2; research on background of Kalfayan experts .7; emails to and from Zimmer on experts .2; legal research on jury trial issue in class action context 1.6;	6.5	
12/5: Calls to several hydrology experts .6; review of databases from Hedlund .3;	.9	
12/8: Emails to and from Hedlund .1; analysis of LO expert summary table from Zimmer .2; participate in LO conf call .6;	.9	
12/9: Further review of mailing list and emails to Hedlund .4;	.4	
12/10: Evaluation of prior discovery for need to compel prior responses and preparation of summary grid re same 2.6; call from Waldo and email to Dunn re mediation costs .3; call with Leggio on settlement .2; email to LOs re settlement status .2; emails to and from Kuhs .1; analysis of discovery to purveyors .4; emails to and from RK re same .1; evaluation of pattern discovery idea .2;	4.1	
12/12: Call and email to and from Dunn .1;	.1	
12/14: Review Nebeker's settlement proposal .2;	.2	

12/15: Prepare and revise notice of class action and file same 1.4;	1.4	
12/17: Call with Bunn .8; evaluation re revisions to notice .2; email to court and RK .2; calls with Bunn and Dunn re class notice and emails to same .5; legal research for injunction motion 2.5; email to and from Waldo .1; review of class website .5; call with RK .5; conf with DOL .3;	5.6	
12/18: Internet research for potential experts and numerous phone calls re same 1.6;	1.6	
12/23: Conf call re discovery .3;	.3	
12/29: Review of responses to discovery .2; email to RK .1;	.3	
12/30: Work on CMC statement .5; email and call with RK re notice problems .3;	.8	
12/31: Email to Dunn and Bunn re objections to Willis notice procedure .3; review and modify DO insert on jury trial right .5; email to and from Dougherty .1;	.9	
TOTAL ATTORNEY HOURS	31.1	

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: November 2008

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
11/3: Review stip .1; attend trial and memo re same 4.1; review Dendy letter .1; emails to and from client and Fife re mediator .5; email re motions .2; research and analysis re ability to enjoin issuance of will serve letter 1.4; legal research on necessity to proceed in rem 2.8;	9.2	
11/4: Attend trial and memo re same 5.2; review corr .1;	5.2	
11/5: Attend trial and memo re same 3.3; email to counsel re new mediator .3; call to L Fowler re mediation .7; review Waldo qualifications and call two references .4; call with client .3;	5.0	
11/6: Emails with Dunn re mediators .1;	.1	
11/7: Emails from LO counsel re next phase issues .2; call with Joyce .5; review Gene list of experts .1; call to RK re notice and trial .4; review mass of will serve and water supply documents and summary of same 3.6; meet and confer email .2; call from class member .4;	5.4	
11/8: Review further records from Joyce and supplement memo 1.3; emails re meeting .1;	1.4	
11/10: Emails re phase 3 meeting .2;	.2	
11/11: Travel to and attend LO meeting re phase 3, memo re same 4.8; review jury trial memo and research re same .6; review recusal memo .2;	5.6	
11/12: Emails with Fowler re mediation .3; review court ruling .1;	.4	
11/14: Emails and call with Fowler .3; review joint CMC .2	.5	
11/15: Review expert list .1; long call with Waldo re mediation position 1.0; call with Hedlund re list .1;	1.2	
11/16: Emails from Leggio and Fife .1;	.1	
11/17: Numerous emails re CMC statements .2; review and comment on same .4; email re Phelan .3; LO conf call, memo to file 1.4; email to Green .1; email re class list .1; further CMC emails .2;	2.7	
11/18: Emails with LO counsel re D40 .4; legal research on inverse condemnation about enjoining public use 3.4; emails to and from DO re class .1; emails to and from RGK re trial issues .3; review Fife well memo .2; email to RZ re McCarran .3;	4.7	

11/19: Review Tejon statement draft .2; attention to drafting and revision of CMC statements .8; review McCarran section and numerous emails re same .4;	1.4	
11/20: Prepare and revise class notice 2.1; emails with DE re principals meeting .2; conf with DO re same .1; further changes to CMC language .2; emails and call with client .3; email to RK re notice issues .2; many emails re strategy and CMC issues .5;	3.6	
11/21: Review numerous CMC statements .7; review RK discovery .1; prepare CMC statement re class notice and revise same .9; call with Hedlund .1; travel to and attend LO meeting, memo re same 3.5; review Lever Decl. .1; review and markup of joint CMC statement .4; emails to and from Fowler re Waldo .3; email to LO counsel re Waldo .5; emails with SH and DZ re class issues .3;	6.9	
11/22: Email from client re notice .2; review John U letters re overdraft .2;	.4	
11/23: Review DZ notice proposal .2; conf with DO .1;	.3	
11/24: Review motion to intervene .1; prepare for CMC, review latest filings .8; extensive drafting of class notice filing and 15+ emails to and from DZ re same 2.8; many emails from LO counsel re discovery, hearing and planning .4; legal research on class notice issues .7; LO ground conf call .8;	5.6	
11/25: Travel to and attend CMC in San Jose 9.4; long email to Dunn re mediation .4; call to JAMS for Cahill info .3; long email to LO counsel re mediator options .6; calls with several LO counsel .2; emails to and from LO counsel re mediation .3;	11.2	
11/26: Call with RGK re many issues 1.5; prepare and serve discovery .8; long call with Waldo re mediator gig .9; review PRA request to Phelan .1; review and markup proposed order, long email to DZ re class notice handling .7; email to Dunn re mediator .4; emails to DZ re jury trial .2; numerous email to LO counsel re injunction motion .3; email to Dunn on database .1; email to RK re complaint .1; emails with John U on water resource .1; analysis and review of integrated water management plan 1.3	6.5	
TOTAL ATTORNEY HOURS	77.6	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: October 2008

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
10/1: email and call with client .2; summary of Rhone depo 2.7; summary of Utley depo and analysis of exhibits 3.3	6.2	
10/2: Emails and call with client .3; review and summary of Oberdorfer depo 3.4; analysis and review of many trial briefs 1.1; review voluminous law and motion filings .9	5.7	
10/3: Summary of Durbin depo 4.1; review further law and motion filings .8;	4.9	
10/5: Review exhibit lists .2;	.2	
10/6: Attend Phase 2 trial 5.2; summary re same .6	5.8	
10/7: Attend trial and meeting with Zimmer/Joyce/RK 4.1; summary re same .5	4.6	
10/8: Attend trial 3.8; review trial filings .5; memo re trial summary .5	4.8	
10/9: Attend trial 3.1; call with client .2; memo re trial .6;	3.9	
10/10: Attend trial 4.8; summary memo re trial .7	5.5	
10/13: Attention to drafting joint notice 2.2;	2.2	
10/15: Review numerous depo notices .2	.2	
10/21: Review motion to continue trial .3; prepare summary memo of trial exhibits 1.0	1.3	
10/22: Review Brunick memo .1;	.1	
10/23: Emails from R Walker .1	.1	
10/24: Courtcall status conference .3; review 12 trial filings of today .7; emails re trial status .1;	1.1	
10/27: Depo of Sheehan 1.0; emails re LO meeting .1;	1.1	
10/29: Review motion to quash filings .3;	.3	
10/30: Email to client .1; review Anaverde trial filings .6;	.7	

10/31: Attend landowner principals meeting in Valencia 3.7; review docs from Lieniger .3;	4.0	
TOTAL ATTORNEY HOURS	52.7	
TOTAL PARALEGAL HOURS		

EXPENSES	AMOUNT
DDS	
Lexis online research	
Fedex	0
In Houses Copy @ .15/page	
postage	
Fax / long distance phone	
TOTAL EXPENSES	
TOTAL TIME AND EXPENSE	\$

Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: Sept 2008

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
9/2: Emails to and from Dendy .2; review cert order .1; review RK Mil .2; review 3 other court orders this day .1;	.6	
9/3: Review Blum and Orr letters, US designation .1; review cost sharing proposal .1;	.2	
9/4: Call to Merrill re depo and document repository .3; email to all counsel .1;	.4	
9/5: Numerous (25+) emails to and from counsel re trial and discovery issues .9; call with client .5;	1.4	
9/6: Email and call with client re basin issues .4;	.4	
9/7: Emails with counsel re class notice .2;	.2	
9/8: Many emails with counsel re notice and trial issues .8; conf call with LO counsel, memo to file 1.1; review Merrill pricing, call to same re questions .3; email to counsel re same .2; many emails from Fife re other basins and settlement issues .3; review and analysis of Chino and SM settlements and memo re same 1.4;	4.1	
9/8: Review and summarize depo notices .3	0	.3
9/9: Review depo notices .1; review CMO .1; emails to and from client and Dendy .2; commence review and analysis of voluminous discovery responses of COLA, D40, QH, Lancaster and Palmdale, and PWD 6.4	6.8	
9/10: Review AVEK settlement .1;	.1	
9/11: Review Davis motion and related filings, research re same .9; emails re call .1; class notice conf call and memo to file .5;	1.5	
9/12: Commence summary memo of discovery responses by LCID, CWC, PWD 7.4	0	7.4
9/12: Review Dunn decl .1; long email to RK re notice issues .6; emails re depo .1; emails to and from RK re documents .2;	1.0	
9/13: Emails with DZ re notice .3;	.3	
9/14: Review Weinstock letter .1;	.1	

9/15: Emails re LO calls .1;	.1	
9/17: Review new AVEK term sheet and comments .2; prepare notice to participate .2; call to DZ re notice .2; review Davis stip .1;	.7	
9/18: Review corr of this day .1; email to and from DZ re settlement issues .8;	.9	
9/20: Review Willis settlement comments .2;	.2	
9/22: LO call and memo to file re same 1.3; emails from LL re trial issues .1;	1.4	
9/24: Review and summary of litany of law and motion filings 1.3; attend Joe S deposition and memo to file re same 3.7;	5.0	
9/25: Emails re depos .2; emails with reporter .1;	.1	
9/26: Review and summary of US discovery response .2;	.2	
9/26: continue summary of discovery responses 4.9; prepare summary of notices of intent .5;	5.4	5.4
9/28: Review and summary of Utley depo 4.6	4.6	
9/29: Attend court hearing and memo to file re same .6; review RK MIL .2; attend Durbin depo and memo to file re same 8.6; many emails re class notice .4;	9.8	
9/30: Review and analysis of numerous MILs .9; summary of Rhone depo 2.1	3.0	
9/30: Prepare summary of experts and disclosures 1.4;	0	1.4
TOTAL ATTORNEY HOURS	48.5	
TOTAL PARALEGAL HOURS		15.1

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: August 2008

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	AMOUNT
8/1: Work on redrafting CMO and notice 2.0; numerous calls and emails to counsel re same 1.2;	3.2	
8/2: Emails to and from client and DOL .2;	.2	
8/3: Emails and calls to and from Tseng/assistant and provide info to same .4; t/c with client .5;	.9	
8/4: Modify ex parte .7; conf call with landowner counsel 1.0; attention to courtcall hearing .1; review reply from Fife .1; review AVAC brief .1;	2.0	
8/5: Prepare reply brief on cert motion 1.1; review Herrema brief on trial location and comment .1; email to Dunn .1; review draft CMC statement .2;	1.5	
8/6: Review numerous documents from Joyce .3; emails and calls to and from LO counsel re: CMC issues .5;	.8	
8/7: Review CMC statements .2; emails to and from client and DOL .2; review class database .3;	.7	
8/8: Email to client and call to same .2; read and summarize Mojave and San Fernando cases 1.3	1.5	
8/10: Review press release by client and call to same .4;	.4	
8/11: Emails to and from client and Dendy .2; prepare for and participate in hearing 1.8;	2.0	
8/12: Review objections to CMO and settlement agenda .2; emails to and from DZ on notice .2;	.4	
8/13: Email to client .2; review and analysis of depo sharing proposal from Merrill .3; analysis and review of physical solutions in three other basins .8; research on di minimis exemptions for small pumers 2.3	3.6	
8/18: Emails to and from DZ re class notice .2;	.2	
8/20: Review Dunn letter .1;	.1	

8/21: Prepare order re certification .2;	.2	
8/23: Review draft notice from DZ .2; call with client .3;	.5	
8/25: Emails and calls with Dunn and Bunn .1;	.1	
8/27: Email to LO counsel re group depo pricing .5; call with DZ .2; email to Bunn .1; call with Balke on depo system .2;	1.0	
8/29: Review Balke email .1; email to RK .1;	.2	
TOTAL ATTORNEY HOURS	19.5	

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE: July 2008

Bill To:
Antelope Valley Water Suppliers

For:
Legal services, Antelope Valley Water litigation

DESCRIPTION	HOURS	PARALEGAL
7/1: Call from Janet Goldsmith .1;	.1	
7/2: Emails to and from Dougherty re discovery .1;	.1	
7/3: review settlement notes .1; review of prior discovery and email to Joyce .6; prepare and file request for dismissal .1; emails to and from client . 1;	.9	
7/7: review settlement proposal from Fife .2; landowner conf call .7;	.9	
7/10: Review joint CMC insert and emails to LO counsel re same .2; call with Zimmer .1;	.3	
7/11: Research on local water conservation ordinances and enforcement of same 2.3; review objection to class cert motion .1; review CMC drafts and emails re same .3;	2.7	
7/12: Review motion to modify and opp to motion to certify .3;	.3	
7/14: Review cmc statement and prepare modifications to same .6; email to Herrema .1; landowner conf call .5;	1.2	
7/15: Review Lancaster's discovery responses .3;	.3	
7/16: Calls to counsel re: CMC statement and review final version of same .4;	.4	
7/18: Review CMC statements .1; review settlement meeing documents .2; emails to and from Dunn .1; email from Dendy re settlement proposals and review same .1; review banking document .2;	.7	
7/20: Call and emails to and from client and editing of settlement framework document .9;	.9	
7/21: Travel to and attend CMC and meeting with landowner counsel after 2.9; phone calls and emails to counsel .3; emails and calls to client .6; email to Dunn and call to counsel .3; emails and call with Dendy on class settlement issues 1.1; email to Dunn .3; emails to and from client .2;	5.7	
7/22: Travel to and attend settlement meeting 5.4; review and analysis re class list .4;	5.8	

7/23: Review report on settlement conference .2; attention to drafting confidentiality agreement for settlement meetings .6; email to DO .1;	.9	
7/25: call and email to Dunn .2; analysis of Willis motion .2; emails to and from client .1;	.5	
7/28: Email and call to Dunn .2; call with Orr and memo re same .9; meeting with O'Leary on class issues .5; landowner conf call .6;	2.2	
7/29: Emails and calls to counsel on CMO issues 1.5; two calls with Leininger .5; research on expert motion .8; review opp to motion to strike and demurrer opp .3; emails to and from Orr on CMO .1;	3.3	
7/30: Drafting of CMO including emails and calls to and from various counsel re same 5.8; research on expert appointment motion .4	6.2	
7/31: Emails to and from client .1; numerous calls and emails to LO counsel and revise CMO 2.8; emails with Orr .1; emails to and from Dendy .2; email to Lieniger .2;	3.4	
TOTAL ATTORNEY HOURS	36.7	
TOTAL PARALEGAL HOURS		

Law Office of Michael D. McLachlan, APC

INVOICE

523 W. Sixth Street, Suite 215
Los Angeles, CA 90014
Phone 213-630-2884 Fax 213-630-2886

DATE June 2008

Bill To:
Antelope Valley Purveyors

For:
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails to and from Fife .3;	.3	
6/2: Review DZ fee memo .2; prepare retainer and email to client .3; review Willis discovery responses .2; preparation of complaint and all related documents 3.0; call with client re same .2; participate in landowner call .8; email to Fife .1;	4.8	
6/3: Long email to DZ and RK .3; email to and from Putnam .2; emails to and from RK re Scalmini meeting and related issues .3; emails to and from Dunn and Pfaeffle re class definition .2; review settlement meeting documents .2; prepare and file notice of related cases .3; prepare notice of errata .2; emails to and from Markman and client re settlement conference .1; emails to and from client on complaint revisions .3; emails to and from Dendy re settlement issues .2; call with Joyce .4;	2.7	
6/3: Continue pleading summary 2.3; commence comprehensive party/pleading summary 3.9	0	6.2
6/4: Emails to and from Sanders .2; emails to and from Putnam .2; calls to clerk re hearing problem .2; letter to court re ex parte on June 9 .3; calls to and from various counsel re class definition problems .6;	1.5	
6/4: Continue party/pleading status summary 2.6	0	2.6
6/5: Review Fife ex parte draft .2;	.2	
6/6: Email from RK .1: legal research in Hutchings book on various water law issues 2.8;	2.9	
6/7: Emails to and from Fife .2; review ex parte .2; review demurrer .3; email to RK .1;	.8	
6/9: Attend settlement meeting 4.7;	4.7	
6/11: Participate in telephonic hearing .5; review Dendy memos .2; emails to and from client re Dendy meetings .3; review joinders .1; emails to and from RK .1; email to Fife .1;	1.3	
6/12: Emails to and from RK .1;	.1	
6/13: Review prior discovery from Joyce .4; commence preparation of RFP and rogs 1.7;	2.1	

6/16: Review ex parte and related papers .2; preparation of motion for class certification 1.3; legal research re class cert issues .1.3	2.8	
6/17: Emails to and from Dunn and Pfaeffle .2; emails to and from DZ .1; call from potential class member .3; analysis of database from Hedlund .3; emails to and from Fife .3; emails to and from Dunn .2; emails to and from DZ and RK re expert meeting .1; attention to calendaring cert motion .1;	1.6	
6/18: Review order .1; prepare notice of association .1; analysis re Doe amendment and prepare same .3; preparation of amended complaint .5; review protective order .2; emails to and from RK .2; call with Dunn .1; review Dendy notes .1; email to DOL re case .2; review expert CVs from Fife .2;	2.0	
6/19: Attend landowner meeting in Burbank and conf with counsel afterward 5.6; emails to and from client .2; emails to and from Fife .1;	5.9	
6/20: Complete motion for class certification and MDM declaration 4.7; calls to and from landowner counsel re class definition issues .5; emails re same .2; call from potential class member and email to RK .5; call with Dunn and email re same .3; numerous emails to landowner counsel on class issues .5; emails to and from Court .1; analysis of potential Doe defendants .3; review answer of Palmdale .1; modify and file first amended complaint .5;	7.7	
6/21: Emails to and from Dougherty .3;	.3	
6/23: Participate in landowner conf call .8;	.8	
6/24: review ex parte applications .3; preparation of ex parte application and MDM declaration .9; prepare notice of designation .2; call with Goldsmith .1;	1.5	
6/25: Participate in ex parte hearing .5; review minute order .1; prepare order for court .2; attend settlement conference meeting 4.5; emails to and from RK and DZ .1;	5.4	
6/26: Review and analysis of technical comm. report and preparation of questions for Scalaminini 6.8	6.8	
6/27: Travel to and attend meeting in San Diego with Scalaminini 7.2;	7.2	
6/28: Emails to Fife and Zimmer .3;	.3	
6/29: Emails to numerous LO counsel .4;	.4	
6/30: Emails to and from Fife .2; prepare summary of J Scal meeting and further review and analysis of expert report and exhibits 3.1	3.7	
TOTAL ATTORNEY HOURS	67.8	
TOTAL PARALEGAL HOURS		8.8

Law Office of Michael D. McLachlan, APC

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Phone 213-630-2884 Fax 213-630-2886

INVOICE

DATE: Aug. 2007-May 2008

Bill To:
Antelope Valley Water Suppliers

For:
Legal services, Antelope Valley Water Adjudication

DESCRIPTION	HOURS	PARALEGAL
8/3/07: Calls and email from potential class representatives Tseng and Lu .7; review pleadings and case file information and assessment of case and issues 2.4; legal research re several issues in water law 1.5;	4.6	
8/9: Corr with clients re several issues .4;	.4	
8/13: Further review of pleadings .5;	.5	
10/31: Ten plus emails to and from Zlotnick re case and review class materials 1.2; call with same .4;	1.6	
11/1: Emails to and from DZ .2;	.2	
11/5: Attend court hearing and meeting with several lawyers and DZ re numerous issues re class 3.8	3.8	
11/8: Legal research on 1021.5 viability and related class issues, memo re same 5.4;	5.4	
11/16: Call with DZ .2;	.2	
11/19: Call to DZ .2;	.2	
4/24/08: Emails to and from DZ .1;	.1	
5/2: Calls with Zlotnick, memo to file .2;	.3	
5/4: Research on court website .4; attention to locating potential class representative, including numerous calls re same 1.7;	1.7	
5/5: Attend status conference and hearings at court, and meeting with attorneys and R. Wood 3.7	3.7	
5/6: Call and email to Fife .1; research and analysis re expert issues 1.4; call with Jeff Dunn .6; emails and calls with client .4; review Willis complaint .2; Call with DZ and memo to file .4; call to defense counsel re background .3;	2.7	
5/8: Email from Fife .1; research on expert issues 1.8; legal research on expert cost recovery issues .9	2.8	
5/9: Research re potential experts and many calls to same 4.1;	4.1	

5/13: Legal research on appointment of expert 1.0; commence letter to Judge .3; call with Steve Johnson .3; review Zimmer letter .1; further research and calls on experts 1.5;	1.7	
5/14: Complete draft of letter to Judge and revise same .9; review of prior filings in the case and preparation of summary memo of same 2.7;	3.6	
5/15: Emails to and from Lemieux re expert issue and calls to Johnson .3; further legal research re 1021.5 legal fees issues, and memo re same 2.4;	2.7	
5/16: Review settlement conference memo and agenda and calls with landowner counsel re status of prior discussions .7; commence review of Hutchins book on CA water law and preparation of memo on key legal issues 3.5; prepare instructions re pleadings to pull .3;	4.5	
5/16: Download and assemble index of important prior pleadings 2.6; commence case history summary 4.7	0	7.3
5/19: Call with Lemieux .2; emails to and from same .1; attention to locating other expert witness, including calls to LO counsel and web research 1.1; email to Johnson .1; review CMO and discovery responses filed this date .2; many emails to and from Fife on expert issue .2;	1.9	
5/20: Call from Nebeker .2; call with client .2; review CMC statements .3; continue review of Hutchings book on procedural issues of water adjudications and groundwater water rights sections 2.6;	3.3	
5/21: Phone calls to numerous counsel on class definition issues .6; review CMC statements .2; emails to and from client .4; research on class issues in property rights arena 2.4;	3.6	
5/22: Attend status conference and meeting with counsel afterward 3.0;	3.0	
5/23: Emails to and from client re settlement .3; continue review of prior filings in case and summary memo of pertinent pleadings 2.6;	2.9	
5/26: Email from client .1;	.1	
5/27: Review class order and emails to and from client .1; review CMC orders .1;	.2	
5/28: Call with Zlotnick .2; commence preparation of class complaint .6; evaluation re prior pleadings filed .6;	1.4	
5/29: Emails to and from client re settlement meeting .2; review agenda and settlement points and call with several LO counsel .3; additional research on 1021.5 fee recovery issues 1.0;	1.5	
5/30: Attend settlement meeting and conference with various counsel after re: class issues 4.2;	4.2	
TOTAL ATTORNEY HOURS	66.6	
TOTOAL PARALEGAL HOURS		7.3

Exhibit 3

LAFFEY MATRIX

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[Case Law](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

* "Years Out of Law School" is calculated from June 1 of each year, when most law students graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

LAFFEY MATRIX

[History](#)[Case Law](#)[Expert Opinions](#)[See the Matrix](#)[Contact us](#)[Home](#)[Links](#)

In general, American courts operate under what is known as the "American Rule" which requires each party to bear the burden for its own legal fees. The Supreme Court has upheld this principle on many occasions for a number of reasons. For example, the knowledge that a loss means paying the other side's legal fees might prohibit plaintiffs from bringing suit or defendants from defending themselves. Nor should a party be penalized for bringing suit or defending itself. Determining proper fees would become an administrative nightmare. Fee awards might also drive attorneys fees up, by removing the pressure of the market and replacing it with the force of the bench.

In certain circumstances, however, both the courts and Congress have found it appropriate to authorize fee-shifting. Especially in the area of Civil Rights and Environmental Law, fee-shifting provisions have been built into statutes. The expense of quality legal counsel should not prohibit private citizens from bringing suit to uphold these laws which are for the common good. There are more than 150 statutes that allow for fee-shifting, among them the Clean Air Act, the Americans with Disabilities Act, the Individuals with Disabilities Education Act, the Rehabilitation Act, the Civil Rights Act, and the Back Pay act.

After years of wrangling over the matter of attorney fee hourly rates, the Court in *Laffey v. Northwest Airlines, Inc.*, 572 F.Supp. 354, 371 (D.D.C. 1983) ruled that hourly rates for attorneys practicing civil law in the Washington, DC metropolitan area could be categorized by years in practice and adjusted yearly for inflation.

The Department of Justice (DOJ) crafted its own rules for, and maintains, its version of the Laffey Matrix (see http://www.usdoj.gov/usao/dc/Divisions/Civil_Division/Laffey_Matrix_7.html)

After scrutinizing the DOJ's methodology of setting and adjusting hourly rates for the Matrix, reviewing recent court decisions and contacting an expert economist, many firms in the Baltimore-Washington area (and due to FLRA/MSPB rulings, around the country) now utilize the Adjusted Laffey Matrix.

LAFFEY MATRIX

[History](#)
[Case Law](#)
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Michael Kavanaugh is an economist from Batavia, OH. Dr. Kavanaugh holds a Ph. D in economics from the University of Cincinnati (1975) and a B.A. in economics from Xavier University (1970). He has taught economics at the University of Cincinnati and at Northern Kentucky University. He has worked as a natural resource and environmental economist for a variety of clients, including the U.S. Department of Justice, the U.S. Environmental Protection Agency, environmental groups and private industry for over 20 years. He has been qualified as an expert in Federal court on financial and economic matter on a number of occasions. He is the economist credited by the D.C. Circuit in the *Salazar* case. His explanation of the advantages of the Adjusted Laffey Matrix are as follows:

The **Laffey** matrix was updated to 1988-1989 rates in connection with the **Save Our Cumberland Mountains v. Hodel**, 857 F.2d 1516 (D.C. Cir. 1988) (**en banc**) litigation. The Consumer Price Index for U.S. City Average, Legal Service Fees ("Legal Services Index") maintained by the U.S. Department of Labor, Bureau of Labor Statistics is a **better measure** of the change in prices for legal services in Washington, D.C., than the Consumer Price Index for Washington, D.C., Maryland, Virginia, All Items ("DC Metro CPI"). He has reviewed both the update to the **Laffey** matrix which uses the Legal Services Index to bring 1988-1989 rates forward to present, and the update referred to as the United States Attorneys' Office **Laffey** matrix, which utilizes the DC Metro CPI to bring 1981-1982 rates forward to present.

Both the Legal Services Index and the DC Metro CPI are readily available and are maintained by the U.S. Department of Labor, Bureau of Labor Statistics. The underlying data are collected by the U.S. Department of Commerce, Census Bureau as part of its quinquennial census and its annual surveys. Economists use as specific an index as possible to determine changes in prices in a part of an industry, such as here changes of prices in legal services in the Baltimore- Washington area. To measure changes in an industry's prices, it is far preferable to use a specific index rather than a broad index.

The Legal Services Index is a national index that includes the metropolitan Baltimore- Washington, D.C., area. Adjusting the **Laffey** matrix with a national index assumes that the rate of change of prices for legal services is about the same everywhere. This is not the same thing as prices being the same everywhere. Even if prices differ in different places, the rate of change in prices is likely to be about the same. With resource mobility and the ability to communicate easily over distances, this is a plausible assumption. While it is possible for prices for the same good or service to change at different rates in different places, this is most likely to happen for goods or services for which there is only a local market because their transport is expensive relative to their value (e.g., fast food) or because communication is difficult.

The market for legal services in federal litigation in the Baltimore- Washington, D.C. area is not a local market. Therefore, it would be more appropriate to use the Legal Services Index, which captures supply and demand factors particular to the legal services market as well as inflation, as compared to the Baltimore-Washington Metro CPI, which chiefly captures inflation effects.

The **Laffey** matrix prepared by Dr. Kavanaugh is preferable to the United States Attorneys' Office **Laffey** matrix for an additional reason. The **Adjusted Laffey matrix** updated is based on observations from 1988-1989, while the United States Attorneys' Office **Laffey matrix** uses

1981-1982 rates as a base. In general, the more contemporary the observations, the less possibility exists for forecasting errors. Thus, the *Adjusted Laffey matrix* is more likely to be an accurate forecast of rates because it applies an index to more recent observations to bring rates forward to the present as contrasted to the United States Attorneys' Office *Laffey* matrix which uses an index to bring forward much earlier observations.

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See Ricks v. Barnes, No. 05-1756 HHK/DAR, 2007 U.S. Dist. LEXIS 22410, at *16 (D.D.C. Mar. 28, 2007) (finding Updated Matrix rates reasonable); *Smith v. District of Columbia*, 466 F. Supp. 2d 151, 156 (D.D.C. 2006) (concluding that use of the Updated Matrix is reasonable and noting that the Updated Matrix is more accurate than the Laffey Matrix because the Updated Matrix is "based on increases/decreases in legal services rather than increase[s]/decreases in the entire CPI which includes price changes for many different goods and services"); *Kempf v. Barrett Bus. Servs.*, No. C-06-3161 SC, 2007 U.S. Dist. LEXIS 89447 (N.D. Cal. Nov. 20, 2007) (finding attorneys' requested fees reasonable when compared to rates in the Updated Matrix).

[Gregory V. Chiron, et al; Plaintiff's response to Order](#)

[Smith v DC et al; Memorandum Opinion](#)

The Third Circuit Court of Federal Appeals adopted the Adjusted Laffey Matrix. *Interfaith Community Organization v. Honeywell International, Inc.*, 426 F.3d 694 (3rd Cir. 2005). ("In updating the matrix to account for inflation from 1989-2003, ICO relied on the legal services component of the nationwide Consumer Price Index ("the Legal Services Index"), a measure of inflation in the cost of legal services maintained by the Bureau of Labor Statistics."). The Court of Appeals noted that the District Court "reviewed both indices [the DOJ Matrix and the Adjusted Laffey Matrix] and decided that [the Adjusted Laffey Matrix] represented a better measure of prevailing rates in Washington, DC. In so doing, it relied on a decision by the District Court for the District of Columbia, *Salazar v. District of Columbia*, 123 F.Supp.2d 8 (D.D.C.2000), which compared the U.S. Attorney's Laffey Matrix with a matrix similar to that put forward by ICO in this case and concluded that the latter method was superior. *Salazar* is one of the few decisions approving the use of this approach, and it is, according to ICO, the only decision (prior to the District Court decision in this case) comparing the two approaches."

The Fourth Circuit has implicitly supported the use of the legal services component of the CPI, rather than the general CPI itself, for determining attorney's fees under 28 U.S.C. § 2412(b). See *Sullivan v. Sullivan*, 958 F.2d 574, 577 & n.8 (4th Cir. 1992). The US District Court for the District of North Carolina has adopted the Adjusted Laffey Matrix as well. *North Carolina Alliance for Transportation Reform, Inc. v. United States Department of Transportation*, 168 F. Supp. 2d 569 (D.NC 2001) ("Plaintiffs adjust the matrix's billing rates by applying the annual inflationary factor for legal services as reported in the United States Department of Labor's Consumer Price Index ("CPI)"). Some California Federal courts have accepted the same methodology, adjusting the Laffey Matrix upwards based upon the higher costs of living in Los Angeles and other California cities. *In Re HPL Technologies, Inc. Securities Litigation*, 366 F.Supp.2d 912, 921 (N. Dist. Cal. 2005). See also "It is the practice of the undersigned judge, however, to rely on official data to determine appropriate hourly rates, not on an attorney's self-proclaimed rates or declarations regarding hourly rates charged by law firms. One reliable official source for rates that vary by experience levels is the Laffey matrix used in the District of Columbia." *Garnes v. Barnhardt*, 2006 U.S. Dist. LEXIS 5938 (N. Dist. Cal. 2006).

"The initial estimate of a reasonable attorney's fee "--the so-called lodestar fee--" [sic] is properly calculated by multiplying the number of hours reasonably expended on the litigation times a reasonable hourly rate." **Sexcius v. District of Columbia**, 839 F. Supp. 919, 921 (D.D.C. 1993) [*4] (quoting **Blum v. Stenson**, 465 U.S. 886, 888, 79 L. Ed. 2d 891, 104 S. Ct. 1541 (1984)) aff'd **Covington v. District of Columbia**, 313 U.S. App. D.C. 16, 57 F.3d 1101 (D.C. Cir. 1995) (**Covington II**). **Hensley v. Eckerhart**, 461 U.S. 424 (1983).

Normally, a prevailing party must establish a reasonable hourly rate, usually with affidavits and other evidence of the market rate. **Kling v. Department of Justice**, MSPB Dkt. No. AT075299048 (July 22, 1980)). "Affidavits are a particularly appropriate means of establishing the reasonableness of the amount of fees claimed. **Kling, supra**. A reasonable hourly rate may also be established by affidavits from other attorneys in the community with similar experience stating the rates that they charge fee-paying clients in similar cases. See **Montreuil v. Department of the Air Force**, 55 M.S.P.R. 685, 690-91 (1992) (citing **Swanson v. Defense Logistics Agency**, 35 M.S.P.R. 115, 119 (1987)).

In addition to affidavits and prior fee settlements, the **Laffey Matrix** is very useful as a guide to Market Rate attorney fees for the Baltimore / Washington area. The **Laffey Matrix** has been cited as good evidence of the Market Rate for attorneys practicing in federal employment arbitration matters. See **Department of Health and Human Services, Social Security Administration and AFGE**, 93 FLRR 1-4011 (1993); **Department of the Treasury, Internal Revenue Service, Washington, DC and NTEU**, 93 FLRR 1-1283, 48 FLRA No. 100, 48 FLRA 931 (1993); **Hatfield v. Garrett**, 90 FEOR 1046 (EEOC 1989). **Laffey v. Northwest Airlines, Inc.**, 572 F.Supp. 354, 371 (D.D.C. 1983); **Save Our Cumberland Mountains v. Hodel**, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc).

Regarding the "updated version of the Laffey matrix," the Court in **McDowell v. District of Columbia**, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001) stated in part:

"Plaintiffs may point to such [*9] evidence as an updated version of the **Laffey matrix** or the U.S. Attorney's Office matrix, or their own survey" to demonstrate the prevailing market rates in the community. n5 **Covington II**, 57 F.3d at 1109. Moreover, the plaintiffs may supplement any matrix that has been offered with "evidence of recent fees awarded by the court." **Id.** "Finally, the defendants may challenge plaintiff attorneys' market data, in an effort to show that the submitted market rates are inaccurate." **Id.** at 1110; see also **Covington v. District of Columbia**, 839 F. Supp. 894, 898 (D.D.C. 1993) (**Covington I**) (permitting defendants a chance to persuade court on what prevailing market rates are) aff'd **Covington II**, 313 U.S. App. D.C. 16, 57 F.3d 1101; Cf. **Oil and Chemical Workers**, 2001 WL 427287, at *7 (allowing the defendant to propose alternate methods of compensation for attorneys who did not meet the other factors for receiving compensation).

n5 The matrix may be found in **Laffey v. Northwest Airlines, Inc.**, 572 F. Supp. 354 (D.D.C. 1983)

Here, while the plaintiffs do not give an updated **Laffey matrix**, they do cite the matrix. n6 (Plaintiffs' Motion for fees at 3). Moreover, plaintiffs also supplement their motion by presenting cases that show an increase in the **Laffey scale**. For example, the plaintiffs attached **Dorsett** to show an increase of fees to \$ 280 per hour. (Plaintiffs' Unpublished Cases); **Dorsett v. District of Columbia**, No. 00- 212, slip op. (D.D.C. Sep. 12, 2000). The plaintiffs also included **Wingfield** to justify a fee award of \$ 335 per hour. n7 (Plaintiffs' Notice of Supp. Case); **Wingfield v. District of Columbia**, No. 00-121, slip op. at 6 (D.D.C. Apr. 13, 2001). Finally, recent cases such as **Salazar** have justified an award of \$ 444 per hour and \$ 369 per hour based on an updated version of the **Laffey matrix**. **Salazar v. District of Columbia**, 123 F. Supp. 2d 8, 13 (D.D.C. 2000)."

The Court in **Salazar** approved an updated version of the **Laffey matrix**, which is provided as **Exhibit**

I hereto. The **Laffey** matrix is computed by multiplying a base hourly rate by an Adjustment Factor. The updated **Laffey** matrix uses more accurate, recent base hourly rates and a more accurate Adjustment Factor. The updated **Laffey** matrix has been cited with approval. **See, e.g., McDowell v. District of Columbia**, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001) citing **Salazar v. District of Columbia**, 123 F. Supp. 2d 8, 13 (D.D.C. 2000).