

Michael D. McLachlan (State Bar No. 181705)
LAW OFFICES OF MICHAEL D. McLACHLAN, APC
10490 Santa Monica Boulevard
Los Angeles, California 90025
Telephone: (310) 954-8270
Facsimile: (310) 954-8271
mike@mclachlanlaw.com

Daniel M. O'Leary (State Bar No. 175128)
LAW OFFICE OF DANIEL M. O'LEARY
10490 Santa Monica Boulevard
Los Angeles, California 90025
Telephone: (310) 481-2020
Facsimile: (310) 481-0049
dan@danolearylaw.com

Attorneys for Plaintiff

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER
CASES

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

Plaintiff,

v.

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

Defendants.

JUDICIAL COUNCIL
COORDINATION PROCEEDING No.
4408

Lead Case No. BC 325201

Case No.: BC391869

RICHARD WOOD'S *EX PARTE*
APPLICATION FOR ORDER
MODIFYING CLASS LIST;
DECLARATION OF MICHAEL D.
MCLACHLAN

Date: August 15, 2014 or TBA
Time: 11:00 a.m. or TBA
Place: Telephonic

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on September 5, 2014, at 9:00 a.m., or at
3 such other time as the Court sets, Plaintiff Richard Wood will present the Court
4 with an ex parte application for an order modifying the class member list.

5 The hearing on this application will occur telephonically by CourtCall, or in
6 such other location as the Court may designate.

7
8 DATED: August 14, 2014

LAW OFFICES OF MICHAEL D. McLACHLAN
LAW OFFICE OF DANIEL M. O'LEARY

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11 By: _____
12 Michael D. McLachlan
13 Attorneys for Plaintiff
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1 Plaintiff Richard Wood requests that the Court supplement the small
2 pumper class list of known class members to include the following class member:

3 1. Antelope Valley Mobile Estates, LLC (AIN 473-110-02-00).

4 As set forth in the attached Declaration of Michael D. McLachlan, this
5 entity owns a parcel of land that meets the small pumper class definition, but for
6 various reasons, they are not currently included on the list of known class
7 members.

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9 DATED: September 4, 2014 LAW OFFICES OF MICHAEL D. McLACHLAN
10 LAW OFFICE OF DANIEL M. O'LEARY

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12 By: _____
13 Michael D. McLachlan
14 Attorneys for Plaintiff
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DECLARATION OF MICHAEL D. McLACHLAN

I, Michael D. McLachlan, declare:

1. I am one of the appointed class counsel for the Small Pumper Class, and am duly licensed to practice law in California. I make this declaration of my own personal knowledge, except where stated on information and belief, and if called to testify in Court on these matters, I could do so competently.

2. I attach as Exhibit 1 is a true and correct copy of the Class Inclusion Request Form sent to me by Walter Wilson, counsel for Antelope Valley Mobile Estates, LLC at parcel number 473-110-02-00.

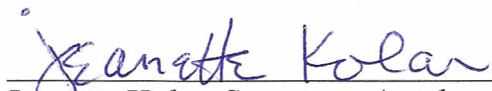
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 3rd day of September, 2014, at Los Angeles, California.

Michael D. McLachlan

Exhibit 1

CLASS INCLUSION REQUEST FORM

I, Jeanette Kolar, Secretary, Antelope Valley Mobile Estates, LLC ("AVME"), wish to participate in the class action proceeding known as *Richard A. Wood. v. Los Angeles County Waterworks Dist. No. 40 et al.* AVME has pumped groundwater on the property after 1946 in an amount less than 25 acre-feet per year in any given year. AVME is not a shareholder in any mutual water company for this property. On or about July 14, 2014, AVME was served with the First Amended Cross Complaint in this action, as ROE 2322, and is only now becoming aware of its rights. On this 27th day of August, 2014, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



Jeanette Kolar, Secretary, Antelope Valley Mobile Estates

6101 Marita Street

Street Address

Long Beach, CA 90815

City/State/Zip

(562) 431-6771

Phone

473-110-02-00

Assessor's Identification Number