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15 Attorneys for Plaintiff

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

18 Coordination Proceeding Special Title  
19 (Rule 1550(b))

20 ANTELOPE VALLEY GROUNDWATER  
21 CASES

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

25 Plaintiff,

26 v.

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

Defendants.

JUDICIAL COUNCIL  
COORDINATION PROCEEDING No.  
4408

Lead Case No. BC 325201

Case No.: BC391869

**RICHARD WOOD'S EX PARTE  
APPLICATION FOR ORDER  
MODIFYING COURT-  
APPOINTED EXPERT FIRM  
NAME; DECLARATION OF  
TIMOTHY THOMPSON**

Date: September 26, 2014  
Time: 10:00 a.m.  
Place: Telephonic

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

2 PLEASE TAKE NOTICE THAT on September 26, 2014, at 10:00 a.m.,  
3 Plaintiff Richard Wood will present the Court with an ex parte application for an  
4 order changing the firm name of the court-appointed expert, Timothy Thompson.

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: September 25, 2014 LAW OFFICES OF MICHAEL D. McLACHLAN  
9 LAW OFFICE OF DANIEL M. O'LEARY

10  
11 By:   
12 Michael D. McLachlan  
13 Attorneys for Plaintiff  
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1 Plaintiff Richard Wood requests that the Court issue an order changing the  
2 firm name of the court-appointed expert, Timothy Thompson, from Cardno  
3 Entrix to GSI Water Solutions, Inc. Effective September 22, 2014, Mr. Thompson  
4 has moved to GSI. (Thompson Declaration ¶ 2.)

5  
6 DATED: September 25, 2014 LAW OFFICES OF MICHAEL D. McLACHLAN  
7 LAW OFFICE OF DANIEL M. O'LEARY

8  
9 By:   
10 Michael D. McLachlan  
11 Attorneys for Plaintiff

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**DECLARATION OF TIMOTHY THOMPSON**

I, Michael D. McLachlan, declare:

1. I am the court-appointed expert in this matter. 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. Effective September 22, 2014, I have joined GSI Water Solutions, Inc. and am no longer employed by Cardno Entrix. I remain willing to perform the work necessary to assist the Court in this litigation. GSI Water Solutions is agreed to the continuation of this work, but requires an Order from the Court to formalize the retention.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 25<sup>th</sup> day of September, 2014, at Santa Barbara, California.

  
\_\_\_\_\_  
Timothy Thompson