

Michael D. McLachlan (State Bar No. 181705)
LAW OFFICES OF MICHAEL D. McLACHLAN, APC
44 Hermosa Avenue
Hermosa Beach, California 90254
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
2300 Westwood Boulevard, Suite 105
Los Angeles, California 90064
Telephone: (310) 481-2020
Facsimile: (310) 481-0049
dan@danolearylaw.com

Attorneys for Plaintiff Richard Wood 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

Lead Case No. BC 325201

Case No.: BC 391869

**RICHARD WOOD'S AND THE
SMALL PUMPER CLASS'
DISCLOSURE OF WITNESSES
AND EXHIBITS REGARDING
THE PROVE-UP OF THE
STIPULATED JUDGMENT AND
PHYSICAL SOLUTION**

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that in accordance with Court's Second Case Management Order dated March 27, 2015, Richard Wood and the Small Pumper Class hereby disclose the following witnesses and exhibits regarding the prove-up of the Stipulated Judgment and Physical Solution trial as follows:

Witnesses:

1. Timothy Thompson (non-retained, court-appointed expert) – Claim of reasonable and beneficial use by the Class and Class water use;
2. Mark Wildermuth (non-retained expert) – ownership, Class member identification;
3. Richard Wood -- Claim of reasonable and beneficial use;
4. Fredrick J. Koch III – Business Records of Southern California Edison (if necessary).
5. As necessary, Richard Wood and the Class reserve the right to call the following Class members who have participated in the survey work by the court-appointed expert:

Don Anderson	Cathy Gutierrez	Javier Pomposo
Anthony Austin	Ron Hawkins	Kristy Prelewicz
Ron Banuk	Dave Hester	James Quillen
Don Bellanca	Wayne Hill	Wilma "Charlie" Reasor
Gayle Bovee	Richard Hoier	James Reuter
Russ Clawson	Zeneida Houchen	Richard Robbins
Judyth Coffman	Edith Hoyt	Barbara Rogers
Tarali Crawford	George Jung	Ted Schnaidt
George Curtis	David Kerr	Jack Schweizer
Roger Damron	Eleonore Kertzman	Roger Sides
Shirley Davidson	RoseMarie King	Willard 'Bud' Sloney
James Deckert	Diane Klechefski	Bill Smith
Gary DeVoe	Robert Large	Toni Steele
Milton Doucette	Patty/Charles Lennox	Judith Sterling
Sherri Dumin	Wanda Leon	Randy Stevens
Jerry Dunn	Lauri/Mike Lytle	Linda Storsteen

Mary Enos	Suzan Macisaac	Edmund Swayze
Robert Fennell	Henry Maldini	Mark Thompson
Barbara Firsick	Jules Marcogliese	John Thurston
Harry France	Peter Maslanik or Sharon Brown	James Tribuzi
Charles Francoeur	Donald Masters	John/Ida Tucker
Lou Garcia	Albert Maupin	Margaret Tucker
Armen Gezalyan	Dave McCrae	Chuck Tyler
John Gibbs	Martin or Fina Morel	James Ward
Jeff Godde	Mary Murphey	George Webb
John Graham	Gertrude Mynear	Michael or Patricia Welsh
Jeanne Gregory	Beverly Newcomer	Leslie West
Mike Grimes	Jim Nye	Karen Wonnell
	Glenn Olson or Deborah Adkins	

The above list does not include any witnesses to be called for rebuttal and impeachment, if any. In addition to the witnesses listed above, Wood and the Class reserve the right to supplement or add to this list of witnesses if necessary.

Exhibits:

1. The report of Timothy Thompson, and all exhibit thereto;
2. The Class member records relied upon by Timothy Thompson;
3. The 2009 list of known class members used for initial class notice;
4. The current list of known class members.

In addition to the exhibits listed above, Wood and the Class reserve the right to supplement or add to this list of exhibits if necessary.

DATED: April 24, 2015

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

By: _____
Michael D. McLachlan
Attorneys for Plaintiff