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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 RE: COURT-
APPOINTED EXPERT AND
CLASS MEMBER
PARTICIPATION**

1 **DECLARATION OF MICHAEL D. MCLACHLAN**

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3 I, Michael D. McLachlan, declare:

4 1. I make this declaration of my own personal knowledge, except where

5 stated on information and belief, and if called to testify in Court on these matters,

6 I could do so competently.

7 2. I am co-counsel of record of record for Plaintiff Richard Wood and

8 the Small Pumper Class, and am duly licensed to practice law in California.

9 3. At the start of the court-appointed expert project for the Small

10 Pumper Class, I provided Mr. Timothy Thompson with then-current class list.

11 Mr. Thompson randomly selected class members and sent that list to me. My

12 office then mailed requests to the class members to participate in the project. I

13 closely supervised the mailings and can confirm that each of the class members

14 selected by Mr. Thompson was sent the solicitation letter.

15 4. Except for two people who no longer met the class definition, my

16 office sent the contact information to Mr. Thompson for every person who

17 responded to the mailings. All of these correspondences were also copied to the

18 designated liaison counsel, Michael Fife and Jeffrey Dunn.

19 5. Some class members also mailed some of their records (such as

20 electrical billing and groundwater well records) directly to my office. All such

21 records received by my office were forward to Mr. Thompson. All of these

22 correspondences were also copied to the designated liaison counsel, Michael Fife

23 and Jeffrey Dunn.

24 6. I will also note that Willis Class counsel has made reference to Mr.

25 Wildermuth's recollection during his testimony on August 3, 2015 that the Small

26 Pumper Class around 7,500 members. Initially, the list was actually higher than

27 that number due to the Wildermuth firm being given out of date service areas for

28 Waterworks District Number 40 and certain other errors causing Palmdale Water

1 District customers to be on the initial list. After correction of these issues, the
2 Small Pumper Class list decreased by several thousand people. My firm and Mr.
3 O'Leary's also spent many hours reviewing the class list against membership lists
4 for the mutual water companies.

5 I declare under penalty of perjury under the laws of the State of California
6 that the foregoing is true and correct. Executed this 3rd day of September 2015, at
7 Hermosa Beach, California.

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11 _____
12 Michael D. McLachlan
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