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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

**NOTICE RE: SMALL PUMPER  
CLASS MEMBERS POTENTIALLY  
SUBJECT TO ERRONEOUS  
ENTRY OF DEFAULT**

1 Plaintiff Richard Wood files this Notice to advise the Court and all parties  
2 of the potentially erroneous entry of default judgments entered against various  
3 Small Pumper Class member. These persons are identified on the list attached  
4 as Exhibit 1.

5 The Court need not take action as to these Class members because the  
6 proposed Judgment and Physical Solution contains the following provision:

7 **5.1.3.4** Defaults or default judgments entered against any Small Pumper  
8 Class Member who did not opt out of the Small Pumper Class are hereby  
9 deemed non-operative and vacated *nunc pro tunc*, but only with respect to  
10 their ownership of real property meeting the Small Pumper Class  
11 definition.

12 Hence, any default or default judgment entered against a Small Pumper  
13 Class member does not adversely impact their rights as Class members.

14  
15 DATED: December 17, 2015 LAW OFFICES OF MICHAEL D. McLACHLAN  
16 LAW OFFICE OF DANIEL M. O'LEARY

17  
18 By: \_\_\_\_\_  
19 Michael D. McLachlan  
20 Attorneys for Plaintiff  
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# **Exhibit 1**

**Exhibit 1: Class Members Potentially On Default List**

John S. Alesso (Roe 589)

Moon S. Chang (Roe 880)

William Cordova (Roe 431)

Fernandez Family Living Trust (Roe 460)

Betty Gambone (Roe 1095)

Karen Hart (Roe 1186)

David Jones (Roe 1296)

Jim Lee (Roe 1407)

Elaine L. Morales (Roe 530)

Philip Schultz (Roe 1892))

Maria Sanchez (Roe 1868)

Larry Smith (Roe 1868)

Robert Smith (Roe 1948)

Sharon Tremblay (Roe 1951)

Daniel Walden (Roe 2124)

George Webb (Roe 2140)

Richard Wheaton (Roe 2147)

Karen Wonnell (Roe 2180)