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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
(Honorable Jack Komar)

Lead Case No. BC 325201

Case No.: BC 391869

**DECLARATION OF DANIEL M.
O'LEARY IN SUPPORT OF
MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS AND
INCENTIVE AWARD**

Location: Dept. TBA
Santa Clara Superior Court
191 N. First Street
San Jose, California
Date: March 21, 2016
Time: 1:30 p.m.

I, Daniel O’Leary, declare:

2. I am co-counsel of record of record for Plaintiff Richard Wood and the Class, and am duly licensed to practice law in California. I graduated from University of California, San Diego with a degree in mathematics, and from U.C.L.A. School of Law in 1994. I have been a Plaintiff's contingent attorney for over twenty years, specializing in complex litigation.

4. As of January 22, 2016, my firms' costs of suit in this matter total \$6,421.28, with an outstanding balance of \$4,339.73. Attached hereto as **Exhibit 2** is a copy of my cost bill.

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**DECLARATION OF DANIEL M. O'LEARY IN SUPPORT OF MOTION FOR
AWARD OF ATTORNEYS' FEES, COSTS AND INCENTIVE AWARD**

1 6. Like Mr. McLachlan, I have worked on this case for over eight years
2 with no compensation or cost reimbursement except that received through the
3 2013 settlement with several public water suppliers. Nevertheless, we have
4 represented the Class zealously and achieved a result that will allow small
5 domestic pumpers in the area of adjudication to continue to pump water without
6 the threat of prescriptive claims or, generally, assessments. Moreover, the Class
7 has protections against future reductions. Notably, no class members objected to
8 the settlement.

9 7. As explained in Mr. McLachlan's declaration, in 2013, we reached a
10 settlement with several defendants, for which we received a partial fee award at a
11 rate of \$550 per hour for attorney time and \$110 per hour of paralegal time. The
12 Court approved this, specifically finding it to be a reasonable rate. That rate,
13 however, was discounted to reflect the facts that (1) the reduced rate was a
14 condition of the settlement with these defendants, (2) a higher rate would likely
15 have prevented the settlement from occurring, and (3) the settling defendants
16 were proportionally responsible for only a relatively small amount of the fees,
17 relative to their pumping volumes. The \$550 rate was a below-market rate in
18 2013 and is still below market, setting aside the gigantic delay in payment, the
19 risk of an adverse recovery and the out-of-pocket advancement of expenses.

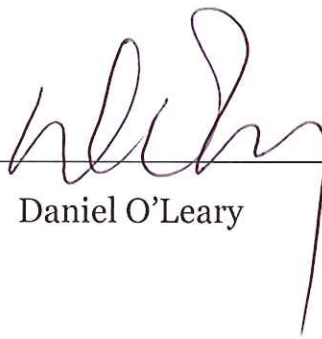
20 8. I am confident that no attorney would have undertaken this
21 representation knowing in advance that fees and costs would not be paid for over
22 eight years (of course, any fee award may be appealed, but that is a different risk
23 and involves different considerations than not having a fee award at all for almost
24 a decade of work). Even though I have spent far less of the past eight years
25 working on this case than Mr. McLachlan, I would have turned down this case
26 had I known how much time would pass before the final resolution.

27 9. To echo Mr. McLachlan, in addition to the resources we have
28 committed to this representation, there is a wide array of relevant facts that

1 justify the full amount of fees we have requested here. Generally, they are: the
2 case's long duration (eight years), the risks of loss and uncertainty, the high
3 quality and great efficiency of the work, the excellent outcome for the class
4 members, the inability to take on other business, as well as the financial toll this
5 case has taken on my office. They all weigh in favor of a 2.5 multiplier.

6 I declare under penalty of perjury under the laws of the State of California
7 that the foregoing is true and correct. Executed this 27th day of January 2016, at
8 Los Angeles, California.

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Daniel O'Leary

Exhibit 1

STATEMENT

Law Office of Daniel M. O'Leary
2300 Westwood Boulevard, Suite 105
Los Angeles, CA 90064
310-481-2020/F:481-0049

DATE: JANUARY 26, 2016
STATEMENT # [100]

BILL
TO

COMMENTS

| DATE | DESCRIPTION | HOURS | AMOUNT |
|----------|---|-------|--------|
| 06/26/08 | Review Technical Committee Report, prepare for Fri. meeting | 2.5 | |
| 06/27/08 | Meeting at Kalfayan's office w/ Jeff Dunn and Joe Scalmini, travel to San Diego | 10.5 | |
| 07/06/08 | Review of Joint CMC Statement, revision of Phase II trial issues | 0.7 | |
| 07/10/08 | Review oppositions/responses to class certification motion | 0.6 | |
| 07/24/08 | Prepare for class certification hearing, review of transcript for July 21, 2008 hearing | 0.4 | |
| 07/31/08 | Review CMC | 0.5 | |
| 08/01/08 | Review CMO | 0.5 | |
| 08/05/08 | Review class certification motion, oppositions to class certification motion | 1.5 | |
| 08/06/08 | Draft ex parte for continuance of trial/adoption of Wood's CMO | 2.5 | |
| 08/08/08 | Review proposed CMOs, trial briefs, statements of facts, etc., in advance of August 11, 2008 hearing | 7.5 | |
| 08/11/08 | Meet with Richard Wood, prepare for (08/10) and attend hearing, August 11, 2008; review news articles from AV Press | 5.5 | |
| 09/25/08 | Attend Richard Rhone deposition in Ontario | 6.0 | |
| 09/30/08 | Review Lambe report, attend John Lambe deposition | 4.0 | |
| 10/02/08 | T/c with Richard Wood, review of trial briefs for Phase II trial, review of motions in limine for Phase II trial | 2.9 | |
| 10/03/08 | Preparation for Phase II trial | 3.5 | |
| 10/06/08 | Attend Phase II trial, review deposition transcripts | 8.0 | |
| 10/07/08 | Attend Phase II trial, review deposition transcripts | 6.5 | |

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| 10/08/08 | Attend Phase II trial | 4.0 | |
| 10/09/08 | Attend Phase II trial | 4.0 | |
| 10/14/08 | T/c David Litt, Hewitt & Truszkowski (Roe 496) | 0.3 | |
| 11/03/08 | Attend Phase II trial | 4.0 | |
| 11/11/08 | Attend meeting with landowner counsel in Valencia, research in rem issues | 5.5 | |
| 11/17/08 | Review draft CMC | 0.6 | |
| 11/18/08 | Research re McCarran Amendment, review of memo on “will serve” letters | 3.0 | |
| 11/19/08 | Further research on McCarran Amendment; Draft CMC section on McCarran Amendment | 1.4 | |
| 11/26/2008 | Draft discovery to water purveyors | 1.7 | |
| 12/30/08 | Research re jury trial/drafting of brief for inclusion in CMC statement; preparation of CMC Statement for 01/09/09 | 5.5 | |
| 12/31/08 | Read CMC statements from various parties with emphasis on jury trial arguments | 0.8 | |
| 01/09/09 | Hearing. on Jury Trial Motions/CMC for Phase III trial | 3.0 | |
| | Mtg. with Dunn/Garner/Moore/ Pffaefel | 0.0 | |
| 01/13/09 | Research re in rem vs. in personam jurisdiction, effect on class, issues of multiple parcel ownership | 0.8 | |
| 02/05/09 | TC (x3) Kim Updegraff | 0.7 | |
| 02/06/09 | Review legal cases re consolidation | 0.9 | |
| 02/09/09 | Review Tim Thompson declaration | 0.2 | |
| 02/11/09 | Review/comment on letter draft, McLachlan to Dunn | 0.2 | |
| 02/18/09 | Discussion/drafting email re settlement position | 0.3 | |
| 02/21/09 | Review opposition to motion for expert | 0.8 | |
| 02/24/09 | Drafting/editing reply brief re: expert | 1.2 | |
| 03/19/09 | Review material for 04/07 meeting, including Farm Bureau water committee powerpoint | 0.4 | |
| 03/20/09 | Discussion re: class settlement issues | 0.3 | |
| 03/26/09 | Work with McLachlan on draft letter on settlement position for Dunn | 1.5 | |
| 04/08/09 | Review of Dunn’s response to settlement demand, discussion with McLachlan | 0.7 | |
| 04/30/09 | Draft and finalize response to motion to decertify Wood class | 2.9 | |
| 05/06/09 | Correspondence with counsel re: small pumper class list; class notice issues; review M. Moore email re: allocation of court expert fees | 1.7 | |
| 05/08/09 | Draft motion to allocate expert fees; correspondence re: small pumper questionnaire | 2.0 | |

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| 05/19/09 | Prepare and circulate stipulation regarding names of mutual water company shareholders | 0.8 | |
| 05/21/09 | Revise stipulation per comments | 0.2 | |
| 05/22/09 | Review oppositions to motion to allocate expert costs | 0.5 | |
| 05/30/09 | Review landowner's motion to dismiss first amended cross-complaint | 0.3 | |
| 06/04/09 | Draft, revise motion to disqualify, discussion with McLachlan re same; review correspondence from Lemieux & O'Neill | 1.8 | |
| 06/09/09 | Proof and finalize disqualification motion | 1.3 | |
| 06/22/09 | Correspondence from Lemieux & O'Neill re: conflict; motion to disqualify (0.5); correspondence re: comprehensiveness, McCarran Amendment issues (0.2) | 0.7 | |
| 07/06/09 | Review mock-up of class website | 0.8 | |
| 08/07/09 | Draft and send letter to Dunn/Garner | 0.4 | |
| 08/17/09 | Travel to San Jose and return | 9.5 | |
| 08/19/09 | Draft mediation brief for Justice Robie | 5.5 | |
| 08/20/09 | Continue drafting mediation brief | 6.0 | |
| 08/21/09 | Finalize mediation brief | 1.5 | |
| 08/26/09 | Review Willis class mediation brief | 0.1 | |
| 09/02/09 | Travel to Sacramento for mediation with Justice Robie, return | 15.0 | |
| 09/08/09 | Review settlement framework received from M. Moore | 0.6 | |
| 09/09/09 | Emails between M. McLachlan and E. Garner re: prescription issues | 0.3 | |
| 09/29/09 | Review correspondence from Daniel Roberts re class notice | 0.2 | |
| 10/09/09 | Review e-mails re settlement agreement/principals' meetings | 3.2 | |
| | MISSING HEARINGS (PHONE AND IN PERSON) | 0.0 | |
| 10/14/09 | Review confidential email from M. Moore | 0.1 | |
| 10/16/09 | Correspondence with Kalfayan/Zlotnick re class issues | 0.4 | |
| 10/21/09 | Emails/meeting with M. McLachlan re: Markman email; class role in physical solution phase | 0.8 | |
| 10/28/09 | Email from M. Moore outlining terms of proposed settlement | 0.3 | |
| 11/05/09 | Review stipulation of settlement of Willis class | 0.3 | |
| 11/12/09 | Review of proposed Wood class opt-in letter | 0.1 | |
| 12/29/09 | Review of drafts of settlement agreement with PWS | 4.0 | |
| 01/03/10 | Further review/comment on settlement agreement | 1.4 | |
| 01/05/10 | Further review/comment on settlement agreement | 0.3 | |
| 01/06/10 | Research/meeting re: consolidation, effects of consolidation on class | 1.4 | |

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| 02/01/10 | Further review/comment on settlement agreement | 0.8 | |
| 02/03/10 | Revise, proof brief on motion to consolidate | 0.5 | |
| 02/05/10 | Further review/comment on settlement agreement | 0.2 | |
| 02/19/10 | Review order of consolidation signed by Court | 0.4 | |
| 02/22/10 | Further review/comment on settlement agreement | 0.3 | |
| 02/24/10 | Review revised scope of work from Thompson/Entrix | 0.2 | |
| 03/02/10 | Draft CMC Statement for 03/22/10 CMC, including issues of expert witness work, class due process | 1.4 | |
| 03/08/10 | Attend CMC hearing, motions on disqualification, expert fees | 3.5 | |
| 03/10/10 | Begin drafting of writ petition on consolidation order | 6.0 | |
| 03/12/10 | Continue drafting of writ petition on consolidation order; review of procedural history of consolidation order and class notice | 9.0 | |
| 03/15/10 | Continue drafting writ petition, begin preparing tables and exhibits | 12.0 | |
| 03/16/10 | Continue drafting writ petition; conference call with Laura Fowler | 9.0 | |
| 03/18/10 | Review and revise writ petition | 5.5 | |
| 03/19/10 | Review and revise writ petition; correspondence with Laura Fowler | 5.0 | |
| 03/22/10 | Finalize writ petition, tables, exhibits for filing and service | 3.5 | |
| 03/23/10 | Emails with Tom Bunn | 0.2 | |
| 03/25/10 | Emails with PWS counsel re: Entrix bills and court order on bills | 0.8 | |
| 03/26/10 | TC Laura Fowler | 1.3 | |
| 03/30/10 | Correct proof of service of writ petition, file | 0.2 | |
| 04/05/10 | Review e-mails re: settlement meetings; documents received from Laura Fowler | 1.3 | |
| 04/08/10 | Research re: petition for review summary denial of writ petition | 0.5 | |
| 04/09/10 | Review e-mails re: settlement meetings; documents received from Laura Fowler | 0.2 | |
| 04/21/10 | Review e-mails re: settlement meetings; documents received from Laura Fowler | 0.7 | |
| 04/22/10 | Correspondence from Jim Waldo, meeting re same | 3.5 | |
| 04/27/10 | Review documents provided by William West; more documents provided by Laura Fowler | 0.5 | |
| 05/07/10 | Correspondence with Jim Waldo | 0.1 | |
| 05/20/10 | Meeting re: PWS settlement proposal; review of proposal, memo | 1.3 | |
| 05/24/10 | Correspondence from William West | 0.1 | |

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| 06/03/10 | Review of letter posted by Jeff Dunn | 0.1 | |
| 06/04/10 | Discussion/correspondence re: Dunn letter | 0.6 | |
| 06/07/10 | Review of proposed response to Dunn letter | 0.2 | |
| 06/08/10 | Meeting regarding Robie mediation, potential responses | 0.7 | |
| 06/30/10 | Review of William West correspondence, update on settlement process | 1.0 | |
| 07/01/10 | Correspondence re: Waldo process and settlement accord; t/c with class rep | 1.4 | |
| 07/06/10 | Correspondence re: Waldo process and class issues | 0.8 | |
| 07/12/10 | Review of final version of accord; various technical documents | 2.6 | |
| 07/16/10 | Correspondence regarding expert depo fees and costs; review of Willis class stipulation of settlement | 0.4 | |
| 07/29/10 | Correspondence re: Waldo process | 0.2 | |
| 08/03/10 | Review of revised Wood class settlement agreement; correspondence from Laura Fowler | 0.6 | |
| 08/10/10 | Correspondence re: proposed settlement | 0.3 | |
| 08/13/10 | Conversation with McLachlan regarding Palmdale and Lancaster | 0.3 | |
| 08/16/10 | Review documents from William West | 0.2 | |
| 08/18/10 | Review documents from Laura Fowler | 0.5 | |
| 08/27/10 | Research/drafting regarding assessment-free exemptions for class pumping | 1.5 | |
| 09/16/10 | Review of Willis class motion for settlement | 0.9 | |
| 10/14/10 | Correspondence regarding court reporter proposal | 0.3 | |
| 10/28/10 | Review of documents sent by Laura Fowler | 1.0 | |
| 11/17/10 | Review of physical solution outline | 0.4 | |
| 11/19/10 | Review of letter from William West; correspondence with Willis counsel regarding single judgment issues; class settlement issues | 1.3 | |
| 12/03/10 | Review of motions in limine for Phase III | 0.9 | |
| 12/16/10 | Review/comment on new drafts of proposed settlement | 0.5 | |
| 12/28/10 | Phase III trial prep, motions in limine, expert deposition review | 10.0 | |
| 12/29/10 | Phase III trial prep | 4.5 | |
| 01/04/11 | Attend Phase III trial, day one | 5.5 | |
| 01/05/11 | Attend Phase III trial, day two | 9.5 | |
| 01/10/11 | Scalaminini deposition, day 1 | 4.5 | |
| 01/11/11 | Scalaminini deposition, day 2 | 4.5 | |
| 01/12/11 | Scalaminini deposition, day 3 | 4.5 | |

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| 01/13/11 | Scalaminini deposition, day 4 | 4.5 | |
| 01/17/11 | Scalaminini deposition, day 5 | 4.5 | |
| 01/18/11 | Scalaminini deposition, day 5 | 4.5 | |
| 01/19/11 | Scalaminini deposition, day 6, meet with MDM re cross-exam | 4.5 | |
| 01/20/11 | Scalaminini deposition, day 7 | 4.5 | |
| 01/31/11 | Phase III trial | 7.5 | |
| 02/01/11 | Phase III trial | 7.5 | |
| 02/23/11 | Review/comment on proposed stipulation of settlement | 1.4 | |
| 02/25/11 | Correspondence with D. Zlotnick on Willis fee motion | 0.4 | |
| 03/02/11 | Review correspondence from Warren Wellen re: settlement progress | 0.3 | |
| 03/07/11 | Review correspondence re: settlement agreement; confer with MDM re settlement agreement | 0.6 | |
| 03/08/11 | Review correspondence re: settlement agreement | 0.3 | |
| 03/09/11 | Review fee motion/oppositions re: Willis class settlement | 2.2 | |
| 03/17/11 | Conversation with M. McLachlan re memo received from Bill Brunick | 0.1 | |
| 03/29/11 | Correspondence regarding settlement agreement, proposed judgment | 0.6 | |
| 03/30/11 | Conversation with M. McLachlan re: D40's position on settlement, renewal of expert motion | 0.3 | |
| 04/08/11 | Review documents/powerpoint slides received from Steven Dassler; review redline draft of proposed settlement agreement | 1.4 | |
| 04/11/11 | Meet with MDM re preliminary approval motion, comment on BBK draft | 1.1 | |
| 04/25/11 | Review/revise letter to Judge Komar | 0.2 | |
| 04/26/11 | Review proposed judgment forwarded by W. Wellen | 0.3 | |
| 05/02/11 | Review draft of motion for preliminary approval, review E. Garner declaration; summary notice; various exhibits | 1.8 | |
| 05/06/11 | Review order on Willis class fee application and tentative decision from Phase 3 trial | 0.2 | |
| 05/12/11 | Review opposition documents to motion for preliminary approval, summarize | 1.4 | |
| 06/16/11 | Meet with MDM re preliminary approval motion, discuss options re court expert, class decert | 0.6 | |
| 06/20/11 | Review proposed statement of decision Phase III trial, objections to same; Review revised class settlement agreement, further review of objections to statement of decision | 2.6 | |
| 07/07/11 | Draft motion for order authorizing expert work | 3.1 | |

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| 07/08/11 | Further drafting of motion for expert work | 1.0 | |
| 07/14/11 | Review further revised draft settlement agreement | 0.4 | |
| 07/25/11 | Review/revise letter to Justice Robie | 0.3 | |
| 08/05/11 | Review/revise letter to Justice Robie | 0.5 | |
| 08/29/11 | Review mediation submissions, meeting with McLachlan, e-mails with Richard Wood; research re: class decertification | 4.5 | |
| 08/31/11 | Attend mediation in Sacramento | 10.0 | |
| 09/02/11 | Review of pumping submissions forwarded by T. Bunn | 0.6 | |
| 09/07/11 | Emails re: single family residential water use, review of D40 data and Scalmini testimony from Phase III deposition | 1.1 | |
| 09/13/11 | Review of AV United billing enclosure | 0.1 | |
| 09/15/11 | Review of Palmdale Water District data on single family residential use, correspondence with McLachlan and Wood | 0.4 | |
| 01/13/12 | Proof and finalize motion for expert authorization | 0.7 | |
| 02/02/12 | Review letter and attachments from B. Brunick | 0.3 | |
| 02/17/12 | Read order from court of appeal on Willis class fee appeal | 0.2 | |
| 02/27/12 | Review of water allocation spreadsheets | 0.5 | |
| 04/03/12 | Review of allocation resulting from Justice Robie mediation | 0.5 | |
| 04/13/12 | Review proposed stipulated judgment | 1.2 | |
| 04/27/12 | Review proposed physical solution document from R. Zimmer; comments from various parties to same | 0.8 | |
| 05/02/12 | Telephonic status conference | 1.4 | |
| 08/09/12 | TC Brian Martin, attorney for Sorrento West Properties | 0.4 | |
| 08/16/12 | Emails with McLachlan re: class claims against overlying landowners | 0.3 | |
| 09/18/12 | Review of email from Justice Robie, conversation with McLachlan | 0.2 | |
| 10/08/12 | Review of CMC statement of federal government | 0.3 | |
| 10/10/12 | Review master document from drafting committee | 1.1 | |
| 10/23/12 | Review/comment on letter from McLachlan to Fife | 0.1 | |
| 11/16/12 | Review of settlement points forwarded by Tom Bunn | 0.2 | |
| 12/10/12 | TCW counsel for Cal-Golf | 0.3 | |
| 12/11/12 | Prepare for and attend trial setting conference (courtcall) | 4.2 | |
| 12/14/12 | Attend trial conference (telephonic, BB& K); review correspondence with T. Thompson | 1.1 | |
| 01/10/13 | Review/comment on Entrix work, Tim Thompson question | 0.5 | |
| 01/15/13 | Review proposed CMO for Phase 4 trial, comment | 0.4 | |
| 01/30/13 | Review Declaration in lieu of deposition, numerous | 2.6 | |
| 02/21/13 | Review orders for Phase 4 trial | 0.3 | |

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| 03/22/13 | Review of LAC WW D40's motion for sanctions | 0.3 | |
| 03/26/13 | Meet with McLachlan re settlement matrix | 0.4 | |
| 05/06/13 | Communications with R. Wood | 1.2 | |
| 05/17/13 | Finalize class complaint vs. private landowners; review orders for Phase 4 trial | 2.2 | |
| 05/21/13 | Further review of landowner's complaint | 0.2 | |
| 05/23/13 | Review CMO for Phase 4 | 0.1 | |
| 05/28/13 | TCW Ritter Ranch representative | 0.2 | |
| 05/31/13 | Correspondence from S. Blum, draft proposed response | 0.2 | |
| 06/04/13 | Further correspondence from S. Blum and response | 0.2 | |
| 06/06/13 | Prepare and file Petition for Add-On, prepare proposed order | 2.1 | |
| 06/12/13 | Review of LAC WW D40's proposed statement of decision, suggest edits on Wood class treatment | 0.7 | |
| 07/02/13 | Review of collection of oppositions to add-on petition | 1.0 | |
| 07/12/13 | Telephonic CMC | 1.0 | |
| 07/29/13 | Attend CMC, argue add-on petition and expert fee motion | 3.5 | |
| 09/05/13 | Review minute order from 07/29/13 hearing | 0.2 | |
| 10/02/13 | Review proposed settlement agreements; review proposed CMOs for next phase trial | 1.2 | |
| 10/04/2013 | Review emails, redline of Wood settlement agreement | 0.9 | |
| 10/07/2013 | Review and proof class notice | 0.7 | |
| 10/09/2013 | Conversation with MDM re: Wellen email; draft response to Wellen email | 0.8 | |
| 10/10/2013 | Emails to and from client | 0.4 | |
| 10/23/2013 | Review CMO for Phase V and VI trial | 0.3 | |
| 11/26/2013 | Correspondence with Timothy Thompson | 0.3 | |
| 12/03/2013 | Review reply re: motion for final approval of class settlement; emails to and from client | 2.7 | |
| 12/23/2013 | Review D40's oppositions to (1) motion for approval of attorney's fees and costs, (2) motion for good faith determination, and (3) motion for relief from future fees and costs; prepare memo | 2.6 | |
| 12/30/2013 | Revise/edit reply brief re: motion for approval | 0.6 | |
| 01/07/2014 | Draft/review order awarding fees and costs | 0.4 | |
| 01/14/2014 | Finalize proposed order awarding fees and costs | 0.3 | |
| 01/17/2014 | Review proposal for physical solution | 1.2 | |
| 01/18/2014 | Review proposal for physical solution | 0.4 | |
| 01/25/2014 | Correspondence re: Williams deposition, production of documents relating to modeling | 0.7 | |

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| 01/27/2014 | Discussion with MDM re: ex parte application to continue return flow trial | 0.3 | |
| 02/10/2014 | Emails with client | 0.1 | |
| 02/18/2014 | Emails with client (0.4); review exhibit lists and exhibits (0.7) | 1.1 | |
| 02/27/2014 | Review trial briefs | 0.6 | |
| 03/10/2014 | Review of drafts of proposed physical solution | 1.4 | |
| 03/18/2014 | Review expert billings, emails | 0.3 | |
| 03/19/2014 | Review correspondence/proposals re: settlement negotiations | 0.8 | |
| 03/24/2014 | Review motion for judgment on the pleadings | 0.4 | |
| 03/26/2014 | Review motions in limine | 0.5 | |
| 03/28/2014 | Conversation with MDM re: class list, review of ex parte | 0.2 | |
| 03/29/2014 | Review old research and pleadings on jury issues | 1.2 | |
| 04/02/2014 | Review letter from J. Dunn (0.1); review exhibits lists (0.3) and request for judicial notice (0.2) | 0.6 | |
| 04/03/2014 | Review D40's ex parte application (0.2); review trial briefs and responses (0.5) | 0.7 | |
| 04/07/2014 | Correspondence with client | 0.2 | |
| 04/14/2015 | Draft/review settlement timeline | 0.4 | |
| 04/22/2014 | Correspondence with D. Evertz re: Rosamond CSD fee payments | 0.2 | |
| 06/10/2014 | Meet with M. McLachlan re: settlement proposal to LACWWD 40 (0.4); file review and transmittal to McLachlan (0.3) | 0.7 | |
| 07/24/2014 | TC from potential class member (Reesedale Mutual) | 0.4 | |
| 08/14/2014 | Conversation with M. McLachlan re: settlement | 0.5 | |
| 09/26/2014 | Attend telephonic status hearing | 1.3 | |
| 10/05/2014 | Communications with R. Wood re: AVEK workshops | 0.4 | |
| 10/07/2014 | Attend telephonic status hearing | 0.6 | |
| 10/11/2014 | Review draft CMO | 0.2 | |
| 10/14/2014 | Emails with Heather James (Tapia) | 0.1 | |
| 11/03/2014 | Review draft of stipulated judgment (0.4); email correspondence with R. Wood/M. McLachlan (0.2) | 0.6 | |
| 12/08/2014 | Communication with M. McLachlan re: settlement options, class issues | 0.5 | |
| 12/09/2014 | Review Judgment and Exhibits (1.3); research re class issues (0.6) | 1.9 | |
| 12/31/2014 | Review and edit Small Pumper Class Stipulation of Settlement | 1.2 | |
| 01/09/2015 | Review revised Stipulation of Settlement | 0.3 | |

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|------------|---|------|--|
| 06/29/2015 | Draft motion for final approval (2.3) | 2.3 | |
| 06/30/2015 | Draft motion for final approval and declarations (1.1); draft proposed order (0.3) | 1.4 | |
| 07/10/2015 | Review Willis motion to withdraw (0.5); legal research re: Willis motion (0.7) | 1.2 | |
| 07/17/2015 | Research on overlapping classes, class conflicts (4.5) | 4.5 | |
| 07/23/2015 | Draft motion for 128.7 motion for sanctions | 1.4 | |
| 07/24/2015 | Review opposition to Willis motion to enforce settlement | 0.6 | |
| 07/27/2015 | Draft motion to amend Willis judgment (1.4); search docket for history of Willis class definition (0.8) | 2.2 | |
| 08/02/2015 | Review Willis motions in limine nos. 1 and 2 (0.3); research re: evidentiary use of survey and statistical evidence (1.9); read T. Thompson depo transcript (0.5) | 2.7 | |
| 08/03/2015 | Attend hearing on Wood motion for final approval, motions in limine; Thompson outline | 7.5 | |
| 08/04/2015 | Attend hearing on Willis motion to enforce settlement (3.0); email to R. Kalfayan (0.1); finalize motion to amend Willis judgment (0.7) | 3.8 | |
| 08/20/2015 | Review motion/opposition/reply on motion to withdraw (0.7); TCW M. McLachlan re: motion to withdraw (0.4) | 1.1 | |
| 08/21/2015 | TCW McLachlan re: motion to withdraw (0.3); emails with counsel re same (0.3) | 0.6 | |
| 08/25/2015 | Telephonically attend hearing on motion to withdraw (1.8) | 1.8 | |
| 9/01/2015 | Review proposed order denying motion to withdraw (0.2) | 0.2 | |
| 09/02/2015 | Finalize motion to amend/correct Willis judgment (0.9) | 0.9 | |
| 09/15/2015 | Review writ petition filed by Willis class counsel (2.2) | 2.2 | |
| 09/21/2015 | Attend CMC telephonic (0.6) | 0.6 | |
| 09/28/2015 | Attend Phase VI trial; meet with B. Brunick, R. Zimmer, M. McLachlan | 4.5 | |
| 09/29/2015 | Argue motion to amend Willis judgment (0.8) | 0.8 | |
| 10/15/2015 | Attend Phase VI trial (8.0) | 8.0 | |
| 11/03/2015 | TCW M McLachlan re: closing argument, class issues (0.5) | 0.5 | |
| 11/04/2015 | Attend closing arguments in San Jose | 12.0 | |
| 11/10/2015 | TCW counsel re: judgment issues (0.1) | 0.1 | |
| 11/23/2015 | Review proposed Statement of Decision (0.7) | 0.7 | |
| 12/22/2015 | Review objections to proposed statement of decision | 1.2 | |
| 12/23/2015 | Attend CMC, hearing on objections to statement of decision | 3.2 | |
| 12/28/2015 | Review of judgment and minute order (0.3) | 0.3 | |
| 01/06/2016 | Research re: judgment and fee motions (0.4); communication with McLachlan re: same (0.2) | 0.6 | |

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|------------|---|-------|--|
| 01/14/2016 | Correspondence with client (0.2); review of correspondence re: water master advisory committee (0.3) | 0.5 | |
| 01/15/2016 | Review motion to set aside default judgment (Ritter); review of cases (0.8); conversation with McLachlan, review of depo notice for M. Ritter (0.2) | 1.0 | |
| 01/18/2016 | Correspondence with client (0.3); review of stipulation (0.1) | 0.4 | |
| 01/21/2016 | Draft declaration for fee motion (2.5); review/proof letter from McLachlan to Fife (0.2) | 2.7 | |
| 01/24/2016 | Review of Kalfayan fee motion and supporting docs (1.3); correspondence with McLachlan (0.3); finalize declaration (0.3) | 1.9 | |
| 01/25/2016 | Review Phelan filing (0.2) prepare for M. Ritter depo (0.6) | 0.8 | |
| 01/26/2016 | Prepare for M. Ritter depo. (1.5); correspondence re: depo (0.3) | 1.8 | |
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| | | 511.1 | |
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Exhibit 2

10:47 AM

01/18/16

Accrual Basis

Law Office of Daniel M. O'Leary

Account QuickReport

All Transactions

| Type | Date | Name | Amount | Balance |
|------------------------|------------|----------------------------------|-----------------|-----------------|
| Client Costs | | | | |
| Antelope Valley | | | | |
| Bill | 10/07/2008 | Hahn & Bowersock, Inc. | 939.13 | 939.13 |
| Bill | 10/21/2008 | Paulson Reporting & Litigatio... | 732.49 | 1,671.62 |
| General Journal | 11/30/2008 | | 81.43 | 1,753.05 |
| General Journal | 12/31/2008 | | 84.96 | 1,838.01 |
| General Journal | 01/31/2009 | | 144.08 | 1,982.09 |
| Credit Card Charge | 05/26/2009 | Court Call | 65.00 | 2,047.09 |
| Credit Card Charge | 05/26/2009 | Glotrans E-Filing | 15.70 | 2,062.79 |
| General Journal | 05/31/2009 | | 0.92 | 2,063.71 |
| Bill | 06/15/2009 | DDS Legal Support Systems... | 196.40 | 2,260.11 |
| Credit Card Charge | 07/02/2009 | Glotrans E-Filing | 15.70 | 2,275.81 |
| Credit Card Charge | 08/12/2009 | Southwest Airlines | 297.20 | 2,573.01 |
| Credit Card Charge | 08/17/2009 | PNF-Los Angeles | 23.93 | 2,596.94 |
| Credit Card Charge | 09/02/2009 | Southwest Airlines | 1.30 | 2,598.24 |
| Credit Card Charge | 09/02/2009 | Morton's | 66.48 | 2,664.72 |
| General Journal | 09/06/2009 | | 54.23 | 2,718.95 |
| General Journal | 09/28/2009 | | 42.00 | 2,760.95 |
| General Journal | 03/08/2010 | | 18.00 | 2,778.95 |
| General Journal | 07/08/2010 | Westlaw | 31.60 | 2,810.55 |
| General Journal | 01/04/2011 | | 18.00 | 2,828.55 |
| General Journal | 01/04/2011 | | 18.00 | 2,846.55 |
| General Journal | 01/31/2011 | | 18.00 | 2,864.55 |
| Credit Card Charge | 01/31/2011 | Omni Hotels | 38.47 | 2,903.02 |
| General Journal | 02/01/2011 | | 18.00 | 2,921.02 |
| General Journal | 07/20/2011 | Cash Expense | 40.00 | 2,961.02 |
| Credit Card Charge | 07/27/2011 | Southwest Airlines | 112.00 | 3,073.02 |
| Credit Card Charge | 08/24/2011 | Southwest Airlines | 180.70 | 3,253.72 |
| Credit Card Charge | 08/24/2011 | American Airlines | 158.70 | 3,412.42 |
| Credit Card Charge | 08/31/2011 | Southwest Airlines | 10.00 | 3,422.42 |
| Credit Card Charge | 08/31/2011 | PNF-Los Angeles | 23.93 | 3,446.35 |
| Credit Card Charge | 08/31/2011 | Pyramid Ale House | 38.91 | 3,485.26 |
| Credit Card Charge | 04/27/2012 | Court Call | 78.00 | 3,563.26 |
| General Journal | 07/09/2012 | Cash Expense | 18.00 | 3,581.26 |
| Credit Card Charge | 12/07/2012 | Court Call | 108.00 | 3,689.26 |
| Credit Card Charge | 05/23/2013 | Glotrans E-Filing | 21.00 | 3,710.26 |
| Credit Card Charge | 05/23/2013 | Glotrans E-Filing | 21.00 | 3,731.26 |
| Bill | 05/31/2013 | DDS Legal Support Systems... | 1,663.40 | 5,394.66 |
| General Journal | 07/29/2013 | Classicparking.com | 18.00 | 5,412.66 |
| Credit Card Charge | 10/10/2013 | Court Call | 116.00 | 5,528.66 |
| General Journal | 10/22/2013 | Cash Expense | 10.00 | 5,538.66 |
| Deposit | 01/21/2014 | Law Office of Mike McLachlan | -1,481.46 | 4,057.20 |
| Deposit | 04/10/2014 | Law Office of Mike McLachlan | -90.39 | 3,966.81 |
| Deposit | 05/16/2014 | Law Office of Mike McLachlan | -376.00 | 3,590.81 |
| Bill | 05/31/2014 | DDS Legal Support Systems... | 19.95 | 3,610.76 |
| Deposit | 07/11/2014 | Law Office of Mike McLachlan | -133.70 | 3,477.06 |
| Credit Card Charge | 09/16/2014 | Court Call | 86.00 | 3,563.06 |
| General Journal | 08/03/2015 | Classicparking.com | 36.00 | 3,599.06 |
| Credit Card Charge | 08/19/2015 | Court Call | 86.00 | 3,685.06 |
| General Journal | 09/28/2015 | Classicparking.com | 18.00 | 3,703.06 |
| Credit Card Charge | 09/28/2015 | Kendall's Brasserie | 25.00 | 3,728.06 |
| General Journal | 09/28/2015 | Classicparking.com | 18.00 | 3,746.06 |
| General Journal | 09/29/2015 | Classicparking.com | 18.00 | 3,764.06 |
| General Journal | 10/01/2015 | Classicparking.com | 18.00 | 3,782.06 |
| General Journal | 10/15/2015 | Classicparking.com | 18.00 | 3,800.06 |
| Credit Card Charge | 10/30/2015 | Southwest Airlines | 451.96 | 4,252.02 |
| General Journal | 11/04/2015 | Yellow Cab | 20.00 | 4,272.02 |
| General Journal | 11/04/2015 | Yellow Cab | 25.00 | 4,297.02 |
| Credit Card Charge | 11/04/2015 | Park N Fly | 24.71 | 4,321.73 |
| General Journal | 12/23/2015 | Classicparking.com | 18.00 | 4,339.73 |
| Total Antelope Valley | | | 4,339.73 | 4,339.73 |
| Total Client Costs | | | 4,339.73 | 4,339.73 |
| TOTAL | | | 4,339.73 | 4,339.73 |