

## **Exhibit 3**

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: Dec 2008

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	AMOUNT
12/1: Emails to and from Zimmer re water production .1; review and summary of discovery responses for information on historical purveyor production and overdraft status 1.7; analysis re Sheep Creek motion .3; call with client re injunction motion .2; call with Joyce .2; call with Sheehan .9; listen to Ariki interview online .7; finish review and summary of IRWMP and related docs .4;	4.5	
12/2: review and summary of pleadings for allegations on overdraft status 1.1; call with Judge Cahill's assistant re mediation .2; email from client .1; evaluation of Leroy Simons as potential mediator, including emails to landowner counsel .3;	1.7	
12/3: Research into John Cherry as potential expert and emails and calls to same .6; emails re handling Sheep Creek stip, review and execution of same .3;	.9	
12/4: Research and analysis of potential experts for small pumpers group 2.4; review documents on 3 proposed Willis experts .2; emails to and from David Watson .1; emails to Cherry .1; internet research for information on planned development of wells and new production by purveyors 1.2; research on background of Kalfayan experts .7; emails to and from Zimmer on experts .2; legal research on jury trial issue in class action context 1.6;	6.5	
12/5: Calls to several hydrology experts .6; review of databases from Hedlund .3;	.9	
12/8: Emails to and from Hedlund .1; analysis of LO expert summary table from Zimmer .2; participate in LO conf call .6;	.9	
12/9: Further review of mailing list and emails to Hedlund .4;	.4	
12/10: Evaluation of prior discovery for need to compel prior responses and preparation of summary grid re same 2.6; call from Waldo and email to Dunn re mediation costs .3; call with Leggio on settlement .2; email to LOs re settlement status .2; emails to and from Kuhs .1; analysis of discovery to purveyors .4; emails to and from RK re same .1; evaluation of pattern discovery idea .2;	4.1	
12/12: Call and email to and from Dunn .1;	.1	
12/14: Review Nebeker's settlement proposal .2;	.2	

<b>12/15: Prepare and revise notice of class action and file same 1.4;</b>	<b>1.4</b>	
<b>12/17: Call with Bunn .8; evaluation re revisions to notice .2; email to court and RK .2; calls with Bunn and Dunn re class notice and emails to same .5; legal research for injunction motion 2.5; email to and from Waldo .1; review of class website .5; call with RK .5; conf with DOL .3;</b>	<b>5.6</b>	
<b>12/18: Internet research for potential experts and numerous phone calls re same 1.6;</b>	<b>1.6</b>	
<b>12/23: Conf call re discovery .3;</b>	<b>.3</b>	
<b>12/29: Review of responses to discovery .2; email to RK .1;</b>	<b>.3</b>	
<b>12/30: Work on CMC statement .5; email and call with RK re notice problems .3;</b>	<b>.8</b>	
<b>12/31: Email to Dunn and Bunn re objections to Willis notice procedure .3; review and modify DO insert on jury trial right .5; email to and from Dougherty .1;</b>	<b>.9</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>31.1</b>	

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: November 2008

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
11/3: Review stip .1; attend trial and memo re same 4.1; review Dendy letter .1; emails to and from client and Fife re mediator .5; email re motions .2; research and analysis re ability to enjoin issuance of will serve letter 1.4; legal research on necessity to proceed in rem 2.8;	9.2	
11/4: Attend trial and memo re same 5.2; review corr .1;	5.2	
11/5: Attend trial and memo re same 3.3; email to counsel re new mediator .3; call to L Fowler re mediation .7; review Waldo qualifications and call two references .4; call with client .3;	5.0	
11/6: Emails with Dunn re mediators .1;	.1	
11/7: Emails from LO counsel re next phase issues .2; call with Joyce .5; review Gene list of experts .1; call to RK re notice and trial .4; review mass of will serve and water supply documents and summary of same 3.6; meet and confer email .2; call from class member .4;	5.4	
11/8: Review further records from Joyce and supplement memo 1.3; emails re meeting .1;	1.4	
11/10: Emails re phase 3 meeting .2;	.2	
11/11: Travel to and attend LO meeting re phase 3, memo re same 4.8; review jury trial memo and research re same .6; review recusal memo .2;	5.6	
11/12: Emails with Fowler re mediation .3; review court ruling .1;	.4	
11/14: Emails and call with Fowler .3; review joint CMC .2	.5	
11/15: Review expert list .1; long call with Waldo re mediation position 1.0; call with Hedlund re list .1;	1.2	
11/16: Emails from Leggio and Fife .1;	.1	
11/17: Numerous emails re CMC statements .2; review and comment on same .4; email re Phelan .3; LO conf call, memo to file 1.4; email to Green .1; email re class list .1; further CMC emails .2;	2.7	
11/18: Emails with LO counsel re D40 .4; legal research on inverse condemnation about enjoining public use 3.4; emails to and from DO re class .1; emails to and from RGK re trial issues .3; review Fife well memo .2; email to RZ re McCarran .3;	4.7	

11/19: Review Tejon statement draft .2; attention to drafting and revision of CMC statements .8; review McCarran section and numerous emails re same .4;	1.4	
11/20: Prepare and revise class notice 2.1; emails with DE re principals meeting .2; conf with DO re same .1; further changes to CMC language .2; emails and call with client .3; email to RK re notice issues .2; many emails re strategy and CMC issues .5;	3.6	
11/21: Review numerous CMC statements .7; review RK discovery .1; prepare CMC statement re class notice and revise same .9; call with Hedlund .1; travel to and attend LO meeting, memo re same 3.5; review Lever Decl. .1; review and markup of joint CMC statement .4; emails to and from Fowler re Waldo .3; email to LO counsel re Waldo .5; emails with SH and DZ re class issues .3;	6.9	
11/22: Email from client re notice .2; review John U letters re overdraft .2;	.4	
11/23: Review DZ notice proposal .2; conf with DO .1;	.3	
11/24: Review motion to intervene .1; prepare for CMC, review latest filings .8; extensive drafting of class notice filing and 15+ emails to and from DZ re same 2.8; many emails from LO counsel re discovery, hearing and planning .4; legal research on class notice issues .7; LO ground conf call .8;	5.6	
11/25: Travel to and attend CMC in San Jose 9.4; long email to Dunn re mediation .4; call to JAMS for Cahill info .3; long email to LO counsel re mediator options .6; calls with several LO counsel .2; emails to and from LO counsel re mediation .3;	11.2	
11/26: Call with RGK re many issues 1.5; prepare and serve discovery .8; long call with Waldo re mediator gig .9; review PRA request to Phelan .1; review and markup proposed order, long email to DZ re class notice handling .7; email to Dunn re mediator .4; emails to DZ re jury trial .2; numerous email to LO counsel re injunction motion .3; email to Dunn on database .1; email to RK re complaint .1; emails with John U on water resource .1; analysis and review of integrated water management plan 1.3	6.5	
<b>TOTAL ATTORNEY HOURS</b>	<b>77.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: October 2008

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
10/1: email and call with client .2; summary of Rhone depo 2.7; summary of Utley depo and analysis of exhibits 3.3	6.2	
10/2: Emails and call with client .3; review and summary of Oberdorfer depo 3.4; analysis and review of many trial briefs 1.1; review voluminous law and motion filings .9	5.7	
10/3: Summary of Durbin depo 4.1; review further law and motion filings .8;	4.9	
10/5: Review exhibit lists .2;	.2	
10/6: Attend Phase 2 trial 5.2; summary re same .6	5.8	
10/7: Attend trial and meeting with Zimmer/Joyce/RK 4.1; summary re same .5	4.6	
10/8: Attend trial 3.8; review trial filings .5; memo re trial summary .5	4.8	
10/9: Attend trial 3.1; call with client .2; memo re trial .6;	3.9	
10/10: Attend trial 4.8; summary memo re trial .7	5.5	
10/13: Attention to drafting joint notice 2.2;	2.2	
10/15: Review numerous depo notices .2	.2	
10/21: Review motion to continue trial .3; prepare summary memo of trial exhibits 1.0	1.3	
10/22: Review Brunick memo .1;	.1	
10/23: Emails from R Walker .1	.1	
10/24: Courtcall status conference .3; review 12 trial filings of today .7; emails re trial status .1;	1.1	
10/27: Depo of Sheehan 1.0; emails re LO meeting .1;	1.1	
10/29: Review motion to quash filings .3;	.3	
10/30: Email to client .1; review Anaverde trial filings .6;	.7	

<b>10/31: Attend landowner principals meeting in Valencia 3.7; review docs from Lieniger .3;</b>	<b>4.0</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>52.7</b>	
<b>TOTAL PARALEGAL HOURS</b>		

<b>EXPENSES</b>	<b>AMOUNT</b>
DDS	
Lexis online research	
Fedex	0
In Houses Copy @ .15/page	
postage	
Fax / long distance phone	
<b>TOTAL EXPENSES</b>	
<b>TOTAL TIME AND EXPENSE</b>	\$

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: Sept 2008

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
9/2: Emails to and from Dendy .2; review cert order .1; review RK Mil .2; review 3 other court orders this day .1;	.6	
9/3: Review Blum and Orr letters, US designation .1; review cost sharing proposal .1;	.2	
9/4: Call to Merrill re depo and document repository .3; email to all counsel .1;	.4	
9/5: Numerous (25+) emails to and from counsel re trial and discovery issues .9; call with client .5;	1.4	
9/6: Email and call with client re basin issues .4;	.4	
9/7: Emails with counsel re class notice .2;	.2	
9/8: Many emails with counsel re notice and trial issues .8; conf call with LO counsel, memo to file 1.1; review Merrill pricing, call to same re questions .3; email to counsel re same .2; many emails from Fife re other basins and settlement issues .3; review and analysis of Chino and SM settlements and memo re same 1.4;	4.1	
9/8: Review and summarize depo notices .3	0	.3
9/9: Review depo notices .1; review CMO .1; emails to and from client and Dendy .2; commence review and analysis of voluminous discovery responses of COLA, D40, QH, Lancaster and Palmdale, and PWD 6.4	6.8	
9/10: Review AVEK settlement .1;	.1	
9/11: Review Davis motion and related filings, research re same .9; emails re call .1; class notice conf call and memo to file .5;	1.5	
9/12: Commence summary memo of discovery responses by LCID, CWC, PWD 7.4	0	7.4
9/12: Review Dunn decl .1; long email to RK re notice issues .6; emails re depo .1; emails to and from RK re documents .2;	1.0	
9/13: Emails with DZ re notice .3;	.3	
9/14: Review Weinstock letter .1;	.1	



<b>9/15: Emails re LO calls .1;</b>	<b>.1</b>	
<b>9/17: Review new AVEK term sheet and comments .2; prepare notice to participate .2; call to DZ re notice .2; review Davis stip .1;</b>	<b>.7</b>	
<b>9/18: Review corr of this day .1; email to and from DZ re settlement issues .8;</b>	<b>.9</b>	
<b>9/20: Review Willis settlement comments .2;</b>	<b>.2</b>	
<b>9/22: LO call and memo to file re same 1.3; emails from LL re trial issues .1;</b>	<b>1.4</b>	
<b>9/24: Review and summary of litany of law and motion filings 1.3; attend Joe S deposition and memo to file re same 3.7;</b>	<b>5.0</b>	
<b>9/25: Emails re depos .2; emails with reporter .1;</b>	<b>.1</b>	
<b>9/26: Review and summary of US discovery response .2;</b>	<b>.2</b>	
<b>9/26: continue summary of discovery responses 4.9; prepare summary of notices of intent .5;</b>	<b>5.4</b>	<b>5.4</b>
<b>9/28: Review and summary of Utley depo 4.6</b>	<b>4.6</b>	
<b>9/29: Attend court hearing and memo to file re same .6; review RK MIL .2; attend Durbin depo and memo to file re same 8.6; many emails re class notice .4;</b>	<b>9.8</b>	
<b>9/30: Review and analysis of numerous MILs .9; summary of Rhone depo 2.1</b>	<b>3.0</b>	
<b>9/30: Prepare summary of experts and disclosures 1.4;</b>	<b>0</b>	<b>1.4</b>
<b>TOTAL ATTORNEY HOURS</b>	<b>48.5</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>15.1</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: August 2008

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	AMOUNT
8/1: Work on redrafting CMO and notice 2.0; numerous calls and emails to counsel re same 1.2;	3.2	
8/2: Emails to and from client and DOL .2;	.2	
8/3: Emails and calls to and from Tseng/assistant and provide info to same .4; t/c with client .5;	.9	
8/4: Modify ex parte .7; conf call with landowner counsel 1.0; attention to courtcall hearing .1; review reply from Fife .1; review AVAC brief .1;	2.0	
8/5: Prepare reply brief on cert motion 1.1; review Herrema brief on trial location and comment .1; email to Dunn .1; review draft CMC statement .2;	1.5	
8/6: Review numerous documents from Joyce .3; emails and calls to and from LO counsel re: CMC issues .5;	.8	
8/7: Review CMC statements .2; emails to and from client and DOL .2; review class database .3;	.7	
8/8: Email to client and call to same .2; read and summarize Mojave and San Fernando cases 1.3	1.5	
8/10: Review press release by client and call to same .4;	.4	
8/11: Emails to and from client and Dendy .2; prepare for and participate in hearing 1.8;	2.0	
8/12: Review objections to CMO and settlement agenda .2; emails to and from DZ on notice .2;	.4	
8/13: Email to client .2; review and analysis of depo sharing proposal from Merrill .3; analysis and review of physical solutions in three other basins .8; research on di minimis exemptions for small pumers 2.3	3.6	
8/18: Emails to and from DZ re class notice .2;	.2	
8/20: Review Dunn letter .1;	.1	

<b>8/21: Prepare order re certification .2;</b>	<b>.2</b>	
<b>8/23: Review draft notice from DZ .2; call with client .3;</b>	<b>.5</b>	
<b>8/25: Emails and calls with Dunn and Bunn .1;</b>	<b>.1</b>	
<b>8/27: Email to LO counsel re group depo pricing .5; call with DZ .2; email to Bunn .1; call with Balke on depo system .2;</b>	<b>1.0</b>	
<b>8/29: Review Balke email .1; email to RK .1;</b>	<b>.2</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>19.5</b>	

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: July 2008

**Bill To:**  
Antelope Valley Water Suppliers

**For:**  
Legal services, Antelope Valley Water litigation

DESCRIPTION	HOURS	PARALEGAL
7/1: Call from Janet Goldsmith .1;	.1	
7/2: Emails to and from Dougherty re discovery .1;	.1	
7/3: review settlement notes .1; review of prior discovery and email to Joyce .6; prepare and file request for dismissal .1; emails to and from client . 1;	.9	
7/7: review settlement proposal from Fife .2; landowner conf call .7;	.9	
7/10: Review joint CMC insert and emails to LO counsel re same .2; call with Zimmer .1;	.3	
7/11: Research on local water conservation ordinances and enforcement of same 2.3; review objection to class cert motion .1; review CMC drafts and emails re same .3;	2.7	
7/12: Review motion to modify and opp to motion to certify .3;	.3	
7/14: Review cmc statement and prepare modifications to same .6; email to Herrema .1; landowner conf call .5;	1.2	
7/15: Review Lancaster's discovery responses .3;	.3	
7/16: Calls to counsel re: CMC statement and review final version of same .4;	.4	
7/18: Review CMC statements .1; review settlement meeing documents .2; emails to and from Dunn .1; email from Dendy re settlement proposals and review same .1; review banking document .2;	.7	
7/20: Call and emails to and from client and editing of settlement framework document .9;	.9	
7/21: Travel to and attend CMC and meeting with landowner counsel after 2.9; phone calls and emails to counsel .3; emails and calls to client .6; email to Dunn and call to counsel .3; emails and call with Dendy on class settlement issues 1.1; email to Dunn .3; emails to and from client .2;	5.7	
7/22: Travel to and attend settlement meeting 5.4; review and analysis re class list .4;	5.8	

<b>7/23: Review report on settlement conference .2; attention to drafting confidentiality agreement for settlement meetings .6; email to DO .1;</b>	<b>.9</b>	
<b>7/25: call and email to Dunn .2; analysis of Willis motion .2; emails to and from client .1;</b>	<b>.5</b>	
<b>7/28: Email and call to Dunn .2; call with Orr and memo re same .9; meeting with O'Leary on class issues .5; landowner conf call .6;</b>	<b>2.2</b>	
<b>7/29: Emails and calls to counsel on CMO issues 1.5; two calls with Leininger .5; research on expert motion .8; review opp to motion to strike and demurrer opp .3; emails to and from Orr on CMO .1;</b>	<b>3.3</b>	
<b>7/30: Drafting of CMO including emails and calls to and from various counsel re same 5.8; research on expert appointment motion .4</b>	<b>6.2</b>	
<b>7/31: Emails to and from client .1; numerous calls and emails to LO counsel and revise CMO 2.8; emails with Orr .1; emails to and from Dendy .2; email to Lieniger .2;</b>	<b>3.4</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>36.7</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE June 2008

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails to and from Fife .3;	.3	
6/2: Review DZ fee memo .2; prepare retainer and email to client .3; review Willis discovery responses .2; preparation of complaint and all related documents 3.0; call with client re same .2; participate in landowner call .8; email to Fife .1;	4.8	
6/3: Long email to DZ and RK .3; email to and from Putnam .2; emails to and from RK re Scalomini meeting and related issues .3; emails to and from Dunn and Pfaeffle re class definition .2; review settlement meeting documents .2; prepare and file notice of related cases .3; prepare notice of errata .2; emails to and from Markman and client re settlement conference .1; emails to and from client on complaint revisions .3; emails to and from Dendy re settlement issues .2; call with Joyce .4;	2.7	
6/3: Continue pleading summary 2.3; commence comprehensive party/pleading summary 3.9	0	6.2
6/4: Emails to and from Sanders .2; emails to and from Putnam .2; calls to clerk re hearing problem .2; letter to court re ex parte on June 9 .3; calls to and from various counsel re class definition problems .6;	1.5	
6/4: Continue party/pleading status summary 2.6	0	2.6
6/5: Review Fife ex parte draft .2;	.2	
6/6: Email from RK .1: legal research in Hutchings book on various water law issues 2.8;	2.9	
6/7: Emails to and from Fife .2; review ex parte .2; review demurrer .3; email to RK .1;	.8	
6/9: Attend settlement meeting 4.7;	4.7	
6/11: Participate in telephonic hearing .5; review Dendy memos .2; emails to and from client re Dendy meetings .3; review joinders .1; emails to and from RK .1; email to Fife .1;	1.3	
6/12: Emails to and from RK .1;	.1	
6/13: Review prior discovery from Joyce .4; commence preparation of RFP and rogs 1.7;	2.1	

6/16: Review ex parte and related papers .2; preparation of motion for class certification 1.3; legal research re class cert issues .1.3	2.8	
6/17: Emails to and from Dunn and Pfaeffle .2; emails to and from DZ .1; call from potential class member .3; analysis of database from Hedlund .3; emails to and from Fife .3; emails to and from Dunn .2; emails to and from DZ and RK re expert meeting .1; attention to calendaring cert motion .1;	1.6	
6/18: Review order .1; prepare notice of association .1; analysis re Doe amendment and prepare same .3; preparation of amended complaint .5; review protective order .2; emails to and from RK .2; call with Dunn .1; review Dendy notes .1; email to DOL re case .2; review expert CVs from Fife .2;	2.0	
6/19: Attend landowner meeting in Burbank and conf with counsel afterward 5.6; emails to and from client .2; emails to and from Fife .1;	5.9	
6/20: Complete motion for class certification and MDM declaration 4.7; calls to and from landowner counsel re class definition issues .5; emails re same .2; call from potential class member and email to RK .5; call with Dunn and email re same .3; numerous emails to landowner counsel on class issues .5; emails to and from Court .1; analysis of potential Doe defendants .3; review answer of Palmdale .1; modify and file first amended complaint .5;	7.7	
6/21: Emails to and from Dougherty .3;	.3	
6/23: Participate in landowner conf call .8;	.8	
6/24: review ex parte applications .3; preparation of ex parte application and MDM declaration .9; prepare notice of designation .2; call with Goldsmith .1;	1.5	
6/25: Participate in ex parte hearing .5; review minute order .1; prepare order for court .2; attend settlement conference meeting 4.5; emails to and from RK and DZ .1;	5.4	
6/26: Review and analysis of technical comm. report and preparation of questions for Scalaminini 6.8	6.8	
6/27: Travel to and attend meeting in San Diego with Scalaminini 7.2;	7.2	
6/28: Emails to Fife and Zimmer .3;	.3	
6/29: Emails to numerous LO counsel .4;	.4	
6/30: Emails to and from Fife .2; prepare summary of J Scal meeting and further review and analysis of expert report and exhibits 3.1	3.7	
TOTAL ATTORNEY HOURS	67.8	
TOTAL PARALEGAL HOURS		8.8

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: Aug. 2007-May 2008

**Bill To:**  
Antelope Valley Water Suppliers

**For:**  
Legal services, Antelope Valley Water Adjudication

DESCRIPTION	HOURS	PARALEGAL
8/3/07: Calls and email from potential class representatives Tseng and Lu .7; review pleadings and case file information and assessment of case and issues 2.4; legal research re several issues in water law 1.5;	4.6	
8/9: Corr with clients re several issues .4;	.4	
8/13: Further review of pleadings .5;	.5	
10/31: Ten plus emails to and from Zlotnick re case and review class materials 1.2; call with same .4;	1.6	
11/1: Emails to and from DZ .2;	.2	
11/5: Attend court hearing and meeting with several lawyers and DZ re numerous issues re class 3.8	3.8	
11/8: Legal research on 1021.5 viability and related class issues, memo re same 5.4;	5.4	
11/16: Call with DZ .2;	.2	
11/19: Call to DZ .2;	.2	
4/24/08: Emails to and from DZ .1;	.1	
5/2: Calls with Zlotnick, memo to file .2;	.3	
5/4: Research on court website .4; attention to locating potential class representative, including numerous calls re same 1.7;	1.7	
5/5: Attend status conference and hearings at court, and meeting with attorneys and R. Wood 3.7	3.7	
5/6: Call and email to Fife .1; research and analysis re expert issues 1.4; call with Jeff Dunn .6; emails and calls with client .4; review Willis complaint .2; Call with DZ and memo to file .4; call to defense counsel re background .3;	2.7	
5/8: Email from Fife .1; research on expert issues 1.8; legal research on expert cost recovery issues .9	2.8	
5/9: Research re potential experts and many calls to same 4.1;	4.1	



5/13: Legal research on appointment of expert 1.0; commence letter to Judge .3; call with Steve Johnson .3; review Zimmer letter .1; further research and calls on experts 1.5;	1.7	
5/14: Complete draft of letter to Judge and revise same .9; review of prior filings in the case and preparation of summary memo of same 2.7;	3.6	
5/15: Emails to and from Lemieux re expert issue and calls to Johnson .3; further legal research re 1021.5 legal fees issues, and memo re same 2.4;	2.7	
5/16: Review settlement conference memo and agenda and calls with landowner counsel re status of prior discussions .7; commence review of Hutchins book on CA water law and preparation of memo on key legal issues 3.5; prepare instructions re pleadings to pull .3;	4.5	
5/16: Download and assemble index of important prior pleadings 2.6; commence case history summary 4.7	0	7.3
5/19: Call with Lemieux .2; emails to and from same .1; attention to locating other expert witness, including calls to LO counsel and web research 1.1; email to Johnson .1; review CMO and discovery responses filed this date .2; many emails to and from Fife on expert issue .2;	1.9	
5/20: Call from Nebeker .2; call with client .2; review CMC statements .3; continue review of Hutchings book on procedural issues of water adjudications and groundwater water rights sections 2.6;	3.3	
5/21: Phone calls to numerous counsel on class definition issues .6; review CMC statements .2; emails to and from client .4; research on class issues in property rights arena 2.4;	3.6	
5/22: Attend status conference and meeting with counsel afterward 3.0;	3.0	
5/23: Emails to and from client re settlement .3; continue review of prior filings in case and summary memo of pertinent pleadings 2.6;	2.9	
5/26: Email from client .1;	.1	
5/27: Review class order and emails to and from client .1; review CMC orders .1;	.2	
5/28: Call with Zlotnick .2; commence preparation of class complaint .6; evaluation re prior pleadings filed .6;	1.4	
5/29: Emails to and from client re settlement meeting .2; review agenda and settlement points and call with several LO counsel .3; additional research on 1021.5 fee recovery issues 1.0;	1.5	
5/30: Attend settlement meeting and conference with various counsel after re: class issues 4.2;	4.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>66.6</b>	
<b>TOTOAL PARALEGAL HOURS</b>		<b>7.3</b>

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: December 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
12/2: Long email to Bunn re settlement .6	.6	
12/4: Email to and from Valentine and DR .4;	.4	
12/7: Review Paxton email and PM settlement documents .6; email to Dunn re same .1; long call with Betty Gambone .7; call and emails to and from class members .4; email to Gene re drafting .1; review minutes of PM .1;	2.0	
12/8: Call from 2 class members .4;	.4	
12/9: Many (15+) mails to and from JD, DO, RK and client re settlement issues .6; call from Dunn and memo to file .2; attend PM 3.2	4.0	
12/10: Email to client .1	.1	
12/14: Emails from Gene and Randy re MP .2; review BB questions .1	.3	
12/15: Emails with JD .1; email to Walker re hearing .1	.2	
12/16: Return calls from 7 class members and update master memo 1.9	1.9	
12/17: Review court order re inclusions .1;	.1	
12/24: Settlement email to RK and DO .3;	.3	
12/28: Emails to and from client .3;	.3	
12/29: Emails from DR and Valentine re MTC .2;	.2	
12/30: Review Garner settlement draft .4; emails with client re same .3;	.7	
12/13: Email to Garner re settlement .1	.1	
TOTAL ATTORNEY HOURS	11.6	
TOTAL PARALEGAL HOURS		0

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: November 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
11/2: Call from Lookabaugh and attention to determination of status, return call to same .5; email to Roberts .1; email to Bunn .1; email to RK .1; email to DR .2; emails to DZ .1;	1.1	
11/3: Email to Paxton .1; email to BBK re website .1; prepare for mediation .9	1.1	
11/4: Travel to and attend Robie session 2 13.1;	13.1	
11/5: Call with client .3; call with E Jones re class .4; return calls to 7 class members and update master memo re same 2.2; review and analysis of Willis agreement .3; summary memo re Robie session .4; Call with Sloan .2;	3.8	
11/6: Settlement email to Bunn .4; emails with DO re same and class member issues .3; call with Joyce re writ impact and settlement issues .3; calls to and from 4 class members .6;	1.6	
11/7: Review writ .2;	.2	
11/9: Emails with Bunn re Davis .1; emails with DO and client .2; emails to and from 4 class members re various issues .7; prepare opt in form .3; email to BBK re website .1;	1.4	
11/10: 15 emails with MF, RK and DZ re handling opt ins .5; emails with 6 class members re same; return calls to three class members and update master memo .6;	1.1	
11/11: Emails to and from Paxton re principals mediation session .1; 12+ emails with Garner on ex parte and opt in .9;	1.0	
11/12: Email from Moore .1; call with atty Wooten re CM Mathis .4; emails with same .2; emails with EG .1; emails with 2 class members re Q and lawsuit .3;	1.1	
11/13: Review court order re ad on, emails with EG .1;	.1	
11/14: Emails with client re settlement .4; review Paxton docs .2;	.6	
11/15: Call with client .2;	.2	
11/16: Numerous emails from counsel re Putnam issue .3; review PM settlement documents .4;	.7	

<b>11/18: Preparation and editing of letter to PWS re fees 1.4; emails re DZ re settlement .1; preparation for PM .6; travel to and attend principals mediation session (PM), memo to file 4.5;</b>	<b>6.6</b>	
<b>11/19: Emails with two classmembers .2; return calls to 5 classmembers, update master memo 1.2</b>	<b>1.4</b>	
<b>11/20: Email to JD n/c</b>	<b>0</b>	
<b>11/23: Long call with Valentine and email to DR re same .7; call with Dunn and memo re same on settlement .6; calls to and from three class members .5; email to DR re Valentine .3;</b>	<b>2.1</b>	
<b>11/24: Emails and call with several class members .7</b>	<b>.7</b>	
<b>11/26: Call with R Kuhs 1.5; analysis and review of integrated regional water management plan 1.3;</b>	<b>2.8</b>	
<b>11/27: Legal research on continuing duties of class counsel 1.4; email to DO re same .1; emails with DZ .1;</b>	<b>1.6</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>42.3</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: October 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
10/1: Review new spreadsheets and analysis re same, call with Roberts .4; email to AH re preparation of final class list .2; emails with RW .1;	.3	
10/1: Review and input class Q responses into web site 3.0	0	3.0
10/5: Emails with KH re status .1; Email from Paxton and review consent form .1;	.2	
10/5: Work on identification on nonclass members 2.6; review and input class Q data into web site 5.0	0	7.6
10/6: Email from Paxton and review 7 attachments, call to client re settlement status .5;	.5	
10/6: Review and input class Q responses into web site 7.2	0	7.2
10/8: Call with RK re settlement and consolidation .3; assessment of revised settlement agreement .5; email and calls to BBK .1; call to Joyce .4;	1.3	
10/9: Emails to and from Moore re settlement .2; call with same re same .6; conf with DOL re same .2; review Santa Maria document and commence revised draft settlement 1.2; emails to and from client .1;	2.3	
10/12: Review and input class Q responses into web site 6.2	0	6.2
10/13: Travel to and attend hearing in San Jose including preparation for same 7.5; conf with DOL on same and settlement issues .2; review 170.6 case law and further research re same 1.2;	8.9	
10/14: Call and email with RK re settlement .2; emails to and from DZ re same .2;	.4	
10/15: Analysis of settlement, attention to drafting revised agreement, and research on judgment and approval issues 1.8; email to PWS counsel re settlement issues .2;	2.0	
10/16: Conf with DOL re settlement problems .3; review Willis document and call RK .2; call to client .1; email to Moore et al re problems with settlement .6; email to and from Sloan re class status .2; emails to and from DZ and RK re problems with settlement .3;	1.7	

10/19: Call with client re settlement issues .6; review latest principals settlement material and email to Paxton .3; review class website and email re modifications to same .2; calls to and from class member on various issues .4; emails to and from DZ .1; calls and emails to and from LL .1; review Paxton email and summaries .2;	1.9	
10/19: Review and input class Q responses into web site 7.5	0	7.5
10/20: Emails to and from LL .2; conference call with LL and Dubois .9; emails to and from various PWS counsel and US re settlement issues .6;	1.7	
10/21: Review of briefs opposing 170.6 .3; legal research re same .3; research and evaluation of class notice and consolidation problems .7; prepare memo on same .4; email to DO re settlement issues .4; emails with D counsel re settlement .3;	2.4	
10/22: Review email from DOL on response to memo and call with DOL re: handling consolidation and settlement .4;	.4	
10/23: Legal research on appellate issue re consolidation .5; review of reply brief on 170.6 and research re same .4; return calls to 8 class members, update master memo 2.5	2.4	
10/26: Calls to and from two class members and email to Dan Roberts .6; research on Metter Valley Mutual and long email to BBK re problems re shareholders on class list .8; calls from 2 other class members .3; email to BBK .1;	1.8	
10/27: Telephonic hearing .8; email to landowner counsel .2; numerous emails to and from DZ and RK re settlement issues .5; call with client .2; email to LL re Robie letter .1; further emails to and from DZ and RK on settlement .5; email to client .1; call from Joyce on procedural issues .4;	2.8	
10/28: Emails to and from PWS counsel .2; email from Moore, prepare draft response to same, and conf with DOL re same .7; emails to and from PWS counsel on mediation part 2 .6; review court order .1; many emails to class counsel re settlement issue .7; further emails with D counsel re Robie .2;	2.5	
10/29: Prepare second settlement conference brief for Robie 2.2; emails to and from DOL and Bunn .2; email to MF et al. re writ .1; calls from class members .3;	2.8	
10/30: Email from client re Robie .1	.1	
TOTAL ATTORNEY HOURS	36.4	
TOTAL PARALEGAL HOURS		31.50

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: Sept. 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
9/1: Review Paxton email and atty rules, minutes .2;	.2	
9/2: Travel to and attend mediation in Sacramento with Justice Robie	15.0	
9/3: Analysis re consol and email to DZ .2;	.2	
9/4: Call with RK and emails to and from RK and Sloan re settlement issues .5;	.5	
9/7: Review Fife letter to McDonald, email to DO .2;	.2	
9/8: Calls to and from various class members, research on issues, and emails to same .7; email to Hedlund re Williamson .1; call from Garner .2; review Roe list and research on status of same .2; emails to and from Sloan re Roes and settlement issues .3; emails to and from Garner and Moore and call to same .2; meeting with DOL on settlement issues .7; review of draft settlement .4; research on basinwide prescription .5; long email to Garner .4; emails with BBK re Does and permits .3; emails to and from three class members .4; many (25+) emails with counsel re settlement 1.0;	5.4	
9/9: Review supp brief on motion to consolidate and analysis re attachments .4; call from Chris Sanders on class issues and sanitation claims .5; numerous calls and emails to and from class members on notice forms 1.2; emails and calls re participating in principals settlement .4; research on 2-100 and preparation of draft consent form .5; emails to from Bunn / Paxton et al. re same .3; emails with B Martin re Q .2; emails to and from reporter re story on AV and call with same .9; email to client re interview .2;	3.6	
9/10: Emails with BBK on website and class .2; conf with DO re settlement .2; return calls to 3 CMs re lawsuit and Q .8;	1.2	
9/10: Attention to class list clean up and identification of nonclass members 6.4	0	6.4
9/11: Emails and analysis re class list problems .5; many emails with DZ and DO re settlement .4;	.9	
9/14: Emails re website changes .3;	.3	
9/15: Emails with LO counsel .1;	.1	

<b>9/21: Review Paxton email, reserved rights, and agenda .2;</b>	<b>.2</b>	
<b>9/23: 10+ emails re settlement meeting and review numerous documents, emails with Paxton .6;</b>	<b>.6</b>	
<b>9/24: Call to court clerk re scheduling .1; conf with DOL on settlement issues .1; call to RK re settlement and consolidation .3; email to BBK re class notice .1;</b>	<b>.6</b>	
<b>9/25: Call to clerk and email to DOL on motion .2; email to Lemieux</b>	<b>.2</b>	
<b>9/28: Emails with DR and BBK re unresolved issues .5;</b>	<b>.5</b>	
<b>9/29: Emails with BBK re notice issue and .6;</b>	<b>.6</b>	
<b>9/30: Email Gar re website issues .2; email to RWalker re DQ .1; conf with AH re Q problems .2; emails to DR and review of databases .3;</b>	<b>.8</b>	
<b>9/30: Review and entry of class member Q responses to website 6.7</b>	<b>0</b>	<b>6.7</b>
<b>TOTAL ATTORNEY HOURS</b>	<b>31.1</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>13.1</b>



# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: August 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
8/1: Emails with Paxton re settlement invite .1	.1	
8/2: Long status email to DOL .5; email to Parris re political issues .6; response to class member emails .4; emails to and from BBK .1; research for opp to consolidation motion 1.4; prepare memo to CM contacts to date 1.7	4.7	
8/3: Call with Evertz and talk with DOL re settlement .5; call from Sloan .3; emails to and from RW re scheduling issues .1; legal research on consolidation issues 1.6; calls and emails from class members .7; attention to response form processing issues .5; emails to and from Roberts et al .4; preparation and revision of opp to motion to consolidate 2.3; review numerous filings of this day .6;	7.0	
8/4: Calls with RK on settlement issues .3; call with TT re protocol and water calculation .4; emails to and from client .3; responds to class emails .2; emails to and from House and Hedlund .4; search database for data .3; emails to and from client .2; email to DE re settlement .2; email to EG re permits .1; return call to 7 CMs re notice, supp memo re same 2.1	4.5	
8/5: Review and analysis of client memo on class visits and call to same .5; emails with DO re same .2; return emails and calls to 14 CMs 2.4; update memo re same .3	3.4	
8/6: Emails with RK re settlement .2; emails with client re class notice issues .3; email to BB re Lane issue .1; many emails with BBK and Leever re DB .3; emails re response forms .1; review RK expert motion and opp .2;	1.2	
8/7: 20+ emails re principals meeting consent issue .6; emails to and from client re water level .5; review 4 motion filings today .3; prepare and file brief on stay .2; return calls from 5 CMs re Q and lawsuit 1.3; update memo re same .2; emails with Orr re settlement, email to DO .2;	3.3	
8/8: Email to Orr re settlement problem, conf with DO .3; email to Paxton .2;	.5	
8/9: Emails re settlement conf .1;	.1	
8/10: Emails re Leever on database problems .3; call with SH re response forms and database .2; emails to and from KL re DQ .1;	.6	

8/11: Call with Bill Leever and memo to file .6; prepare and revise CMC statement .6; emails to and from WL re DQ .4; email to TB re data .1;	1.7	
8/12: Call with Tom Bunn and memo to file .5; calls to and from class members 1.2; attention to issues with response forms .5;	2.2	
8/13: Review 7-24 transcript .2; many (15) emails re mediation .3; call with client re mediation update .4	.9	
8/14: Review KL filings .2; emails and call with client re USGS data .3; emails from WL and court re DQ .1; letter from BB and email to same re mediation .1; return call to 6 CMs re lawsuit and Q, update master memo 1.7;	2.4	
8/16: Review CMC statements and prepare for hearings 2.6;	2.6	
8/17: Travel to and attend hearing in San Jose on 9 items 9.0;	9.0	
8/18: Analysis of class data and email to Dunn et al re same .7; emails to and from Dunn and Hedlund .3; Review draft mediation agreement, research on related issues, and email to PWS counsel re class settlement issues and mediation confidentiality 1.9; long email to BBK re CM issues .5;	3.4	
8/19: Emails and conf with DO re mediation .2; emails with RWalker .1; emails to and from client .2; emails with BBK re class .2; long email to DO re case strategy .7; email to SH re remailing .1;	1.5	
8/21: Commence ex parte papers re class issues .4; preliminary review of USGS well data and maps .4; return call to 6 CMs, and respond to emails from 7 others, update master memo re same 2.2; emails to and from TB .1; review and markup draft mediation brief .4; emails with BBK re PO and records .1;	3.6	
8/23: Drafting ex parte application re class issues .8;	.8	
8/24: Review latest excel database of class responses and emails to and from Hedlund .3; preparation of mdm declaration for ex parte and legal research on class notice issue .8; call with Dunn, Hedlund et al re class notice issues .9; conf with DOL on same and mediation issues .2; call to Zimmer re letter of today, settlement, and case strategy .8; emails to and from court re ex parte hearing .1;	3.1	
8/24: Attention to review and input of class member questionnaire responses into website 7.8	0	7.8
8/25: Call with client on settlement issues and water use .9; complete mediation brief .7; emails to and from client on settlement issues .4; review RK letter and email to DOL re same .1; review Paxton agenda and settlement matrix .2; email to Dunn .1; email to Paxton re need for mediator .2; further settlement email and review attachments .3; emails with client re same .2;	3.1	
8/25: Attention to review and input of class member questionnaire responses into website 7.3; conf with MM re status and questions .3	0	7.6
8/26: Finanize brief and email to MMoore re same .2; return calls to 6 CMs and update master memo 1.4;	1.6	
8/26: Attention to review and input of class member questionnaire responses into website 8.1	0	8.1

<b>8/31: Call with client re settlement meeting .2; respond to two CM emails on notice and Q .3;</b>	<b>.5</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>61.8</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>23.5</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: July 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
7/1: Complete and revise letter to Dunn .9; calls to and from RK .2; call to Updegrad .1; brief review of PWS disco responses and instructions to AH re summary of same .5; review JT motion for relief .1; preparation of DQ reply brief sections and editing of same 2.5; email to DO re changes summary .1; email with client re notice .2; email to BJ .1;	4.7	
7/1: Commence preparation of summary of PWS answers to uniform discovery and index of incomplete answers 6.4	0	6.4
7/2: Receive and analysis of new database from SH 1.1;	1.1	
7/2: Continue analysis of small pumper members who are Roe defendants and compare with current class list .5.6	0	5.6
7/3: Emails to and from LO counsel .1;	.1	
7/6: Review and revise FAQ section for website and emails re same 1.2; review website and prepare email re changes .8; emails to and from Fife et al re discovery issues .4; email to House re: additional changes .1; calls from House .2; prepare home page content section .6; prepare short form notice .6; email to Dunn et al re: Roe problems .1; further emails and call with BBK re website .4; email with LO counsel re discovery costs .3;	4.7	
7/7: Emails with client and BBK re case website .3;	.3	
7/8: Calls with Joyce re discovery and Roes issue .3; call from Melnick for Cameron .2; call from Aklufi .1; research on CCP 474 and 583 issues on Roe service .8; ex parte notice .1;	1.5	
7/9: Review Dunn letter of yesterday and email to same .3; call toll free link, and emails to and from DZ and BBK re modifications to same .3; email to JD re suing class members .2; prepare ex parte application and declaration, and revise same 3.2; call with Kim Updegrad .3; email to Hedlund re same .2; prepare notice re bill stuffer .7; attention to fixing website glitches including emails to House, Hedlund, and Goode, and test same .5; emails to and from DOL re DQ and pleadings .2; review draft motion to stay case and long email to Evertz and Bunn .6; emails to client and RK .1; emails and call with Putnam .3; emails to and from 4 classmembers (CM) re handling survey and website issue .5;	7.3	
7/9: Preparation of summary of PWS answers to uniform and index of incomplete answers 6.8; conf with MM .2;	0	7.0

7/10: Calls with Max Z re his 40 properties .3; emails to same re further instruction .2; emails to and from BBK re website .3; court hearing and memo to file re same .5; call to Stephanie H .3; review D40 response to RFP .1; emails with LO counsel re handling consol and discovery issues .3;	2.0	
7/11: Email and call with CM Olsen re suit and property issues .6; long email to and from CM Green re lawsuit and various issues .5; review and comment on bill stuffer .2; review KL letter and conf with DO re DQ .2;	1.5	
7/12: Emails with Green .2; emails to LO counsel re stuffer .2;	.4	
7/13: Emails to and from Kuhs, Fife and Zimmer re class issues .5; review Lemieux letter and filings .2; emails to and from Roberts on summary notice .4; research on prior orders re same .3; review and revise summary notice and email to Robert et al .5; 20+ emails with LO counsel re settlement issues .8; call from to CM re notice .5;	3.2	
7/14: Emails and call with CM Scapillato re lawsuit .5; long email to LO counsel re settlement handling .3; assessment re CM Max Zino issues, analysis of DB and long email to same re properties .6; email to SH re notice decl .1;	1.5	
7/15: Review RK letter .1; review motion to consolidate and Appendix cases, summary of same 1.2; attention to emails with 3 and 2 calls from CMs re notice .6; emails with SH re same .2; many emails with LO counsel re settlement issues .4; email to Dunn re settlement and Does .6; emails with WS re participating in principal meetings .2;	2.7	
7/16: 15 plus emails with LO re settlement, review framework from DZ .4; emails with BBK re website, ads, and Does .3; emails with CM Lytle re notice .2; long email with DR re ads language .5; emails to and from MF re class negotiation .2; calls from three class members re questionnaire (Q) and notice .7	2.3	
7/17: Review stay motion .1; review clerk's notice n/c; emails with CM Lytle .4; emails to and from TB re stuffer .2; long email to KL re conflict and consol, edit same .5; review response to same and conf with DO .2; review settlement matrix .2;	1.6	
7/18: Email re class ad status to DR .1; long call with client re handling settlement conference .6; emails and call with CM Merjil .6; emails to and from Davis re settlement .1; respond to KL email .2;	1.6	
7/20: Emails to and from Hedlund and staff re numerous issues .6; calls to and from Hedlund .3; meet and confer conf call on pleadings and DQ motion etc 1.6; call to RK re class issues .2; emails to and from Dunn re class issues .3; emails to and from Hedlund .1; call with same and House re website issues .5; email to client .1; attention to class member inquiries .8; emails with JD re bill stuffer .4;	4.5	
7/21: Emails to and from House and Hedlund .2; call with Kuhs on pleading issues and motion to dismiss .7; emails to and from client .3; attention to class member inquiries .7; research on DQ issues .4; prepare supp. brief on DQ and revise same .8; finalize summary notice .2; prepare Request for approval of same .3; check and remedy defect in filing of summary notice .2;	3.8	
7/21: Conf with MM re class DB issues .3; KM Review and analysis of class database to determine duplicates, and same household entries, prepare summary of same 8.1	0	8.4

7/22: Review of numerous response forms .4; call with client .3; email to and from BBK .1; emails from MF and DZ .1;	.9	
7/23: Review of numerous response forms meet and confer call with Dunn .6; call with Joyce re consolidation .2; calls to and from class members .7; review Lemieux filings .1; conf call re meet and confer .2; calls to and from class members .6; emails to and from class members .3; review response forms .5; emails to and from Dunn .1; review FAXC .2; review 2006 court transcripts from Dunn re customer issue .9; emails to landowners re hearing issues .2; prepare for hearings tomorrow 1.1; calls and emails to class members .8; emails to and from DOL and LO counsel .2; review motion for appointment of expert .2;	6.9	
7/23: KM Review and analysis of class database to determine duplicates, and same household entries, prepare summary of same 7.1	0	7.1
7/23: AH Conf with MM re handling class Qs .3; attention to returning call and responding to emails of 17 members 3.8	0	4.1
7/24: Travel to and attend hearings on various motions, memo re same 2.5; emails with BBK re notice issue .3; emails with RK and call to same on well permits .3; emails with RK and PWS re mediation w Robiie .3; email to Dunn re expert protocol .2;	3.6	
7/25: Email to BBK re class issue .1; emails re Robie .1	.2	
7/26: Review and analysis of response forms .5; attention to class member emails and calls 1.3;	1.8	
7/27: Calls and emails re mediation date .4; call to Dunn .2; call with RK on settlement and motion to dismiss .5; email to House .2; email to Hedlund .1; revise summary notice and email to Roberts .2; emails to and from counsel re mediation .3; email to Markman re motion to consolidate .2; long call with client on settlement issues .6; email to PWS re expert .3; further emails re settlement .2; emails with RK re Phelan .2; email re motion to consol .1; long email to client re water use issues .6; attention to returning CM calls (9) 1.6; email to JD re expert cost .2;	5.8	
7/28: Emails with two CM re issues .3; email to DR re Updegraff .1;	.4	
7/29: Emails from BD and RK re Robie .3; attention to returning calls and emails of class members (14) 1.9	2.2	
7/30: Call with Roberts .2; call with Joyce .3; attention to handling response forms .4; calls and emails with class members .7; emails from Fife and Dougherty and analysis re same .2; emails to and from Joyce and RK .2	2.0	
7/30: AH Attention to returning call and responding to emails of 22 members, memo re same 3.9; conf with MM re Qs .4	0	4.3
7/31: Call with Joyce on settlement and various motions .6; emails to and from client re settlement .3; calls to and from Evertz re mediation .1; preparation and revision of opp to stay motion 1.5; emails to and from RK .2; emails to and from BBK lawyers .3; review Joyce memo .2; return calls of 8 CMs 1.9; respond to 6 CM emails 1.1	6.2	
TOTAL ATTORNEY HOURS	74.8	
TOTAL PARALEGAL HOURS		42.90

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: June 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails and calls to and from Hedlund and Dunn re notice issues .5; review and revise class notice form .7; prepare proposed order re same .3; emails to parties re same .1; email to Thompson on status .2; review and analysis of class lists and mutual lists .7; conference and instructions to staff re: modification of class lists 1.2; emails to and from Sloan .2; emails to and from US .2; research and preparation of joinder and opposition to motion to dismiss 2.3; email to Lemieux re mutual lists .1;	6.5	
6/2: Revise order and notice for filing .3; call with Sloan .3; attention to handling problems with mutual lists .7; letter to Lemieux and revise same .8; research on conflicts issues .6; letter to Lemieux re same .7; review RK letter and email to same .1; emails to and from Fife .1; calls with client .2; call from Joyce .3; conference with DOL on MSJ and other issues .3; research on MSA on prescription 1.2; letter to Dunn et al on MSA .5;	6.1	
6/3: Review DO draft rogs .2; emails to and from Dunn re well permits .2; conf with Vargas re class list project .3; review preliminary mutual analysis .5;	1.2	
6/4: Review Lemieux letter and further research on DQ issue .5; review court docket for related filings .4; preparation and revision of letter to Lemieux and conf with DO 1.1; call from Lemieux .6; emails to and from LO counsel .4; emails to and from RK and review filings on discovery .4; 15+ emails re mutual lists .7; emails to and from RK re discovery .2;	4.3	
6/5: Research on well permit requirements in LA and Kern Cos, and phone calls re same 2.1; conf with DOL on DQ motion .2; prepare subpoenas for well permits .8; email to Dunn .1; emails to and from Vargas and attention to modifying class lists .8; review filings on Section 731 motion and prepare reply to same .9; emails re boundary map .1; many emails re mutual lists .8;	5.8	
6/5: Work on mutual member exclusion and coding 8.5	0	8.5
6/6: Review of modified class list 1.2;	1.2	
6/6: Work on mutual member exclusion and coding 6.5	0	7.5

6/7: Analysis of class list coding .6; long email to JU re list issues .6	1.2	
6/8: Review filings of Zimmer and email to same .4; emails to and from Walker .1; review Bolthouse objection .1; email to Zimmer re same .3;	.8	
6/8: Work on mutual member exclusion and coding 7.4	0	7.4
6/9: Review opp to motion to dismiss .2; calls and emails with Kern county on well permits .6; emails to Joyce and Zimmer re same .2; modify county subpoena and calls to and from server .3; prepare RFP to County .3; email to Dunn .1; emails to and from Hedlund .1; review new Roes list .4; review AGWA objection .1; emails to and from Fife and call with same re: objections .7; review US objection .1;	3.1	
6/9: Work on mutual member exclusion and coding 7.8	0	7.8
6/10: Revise and file motion to disqualify 2.6; call with Kern County .1; review objections and prepare response to same 1.5; review weeks discovery responses, memo re same .4;	4.6	
6/10: Work on mutual member exclusion and coding 8.2	0	8.2
6/11: Email from client and phone call to same re settlement and stay of case .6; email from TT re notice markup .2; emails re WFF list .2;	1.0	
6/11: Work on mutual member exclusion and coding 7.1	0	7.1
6/12: Prepare for hearing on expert motion and class notice and attend same 1.0; revise and finalize notice .4; emails to and from counsel re same .3; emails to and from MF re WFF .1; emails re bill insert .1; long email to SH re notice .4; email to DO re same .2; email to LO counsel re same .1;	2.6	
6/12: Work on mutual member exclusion and coding 6.3	0	6.3
6/14: Westlaw public records research to determine ability to clarify shareholder status for mutuals on lists 2.0; emails to BS and Do .2;	2.2	
6/15: Call with Kuhs .7; emails to and from court .1; assessment on timing for expert protocol .2; email to Leininger .1; call with Sloan .4; emails with Walker .1; research on defensive class action issues and review of court docket .6; preparation of response re motion to dismiss and revision of same 1.5; real property research on class member lists 1.5; calls and email to and from Vargas re: work on class lists .7; work on website content .7; email to Hedlund re same .4; emails to counsel re bill insert .2;	7.2	
6/15: Work on mutual member exclusion and coding 7.6	0	7.6
6/16: Analysis of bill stuffer and website issues and emails to Hedlund and counsel .5; call with Logan and memo re same .4; call with Hedlund .1; call with Bunn .2; analysis re defendants and answers and research on court web-site .5; conf call with Hedlund .7; review RK response on mtn to dismiss .2; analysis re MSA and conf with O'leary re same .4; legal research on MSA and motion in limine issues re prescription claim .7; call with Hedlund and House .9; calls and emails with Hedlund and proofread and revise notice for printing 2.3; calls and emails to and from Vargas re class list issues .5; review third mailing list database and pumper forms from Willis class .3; emails to and from Bunn .1; review website .2; emails from BD .1;	8.1	



6/16: Compare Mutual Water Company Lists names and addresses against class list and annotate same 7.7	0	7.7
6/17: Complete FAQ section .7; emails to and from Hedlund and call from same re class lists .5; emails re website .2; email to and from House and test email issue .1; confirmation testing of email and website issues .3; calls and emails to and from Vargas re completion of mailing lists and review last list .3; emails to and from court .1; evaluation of well permit data and email to Kern Co .2; status email to Thompson .2; prepare notice of final changes to class notice .3; review notice proofs and emails re changes .8; call with Hickling .3; email to client .1; emails to Dougherty .1; emails to and from Blayney lawyer .1; research on prescription claim MSA .8; review RK stip and emails to and from on modifications .1; attention to numerous tasks re class notice, review of lists, website 3.6	8.8	
6/17: Compare Mutual Water Company Lists names and addresses against class list and annotate same 7.0	0	7.0
6/18: Review revised mailing proofs and email to Hedlund .2; conf with DOL re handling hearing on mtn to dismiss .3; review of US and Borax supplemental briefs .7; call with DOL re same .3; review final version of notice markup and email to Hedlund .5; call to DOL re possible solutions to general adjudication problem .3; call to Dunn .1; review of prior filing on defense class and analysis re handling jurisdiction issues 1.5; email to Dunn and Garner .3;	4.2	
6/18: Compare Mutual Water Company Lists names and addresses against class list and annotate same 7.4	0	7.4
6/19: Call with RK .3; research on defendant classes and requirements form same 1.2; calls to and from Lemieux .4; prepare for hearing .3; attend hearing .6; call with Sloan .4; email to Hedlund on notice .1; call to Dunn .1; conf with DOL re DQ motion and procedural problems .2; review and analysis of long KL letter .5; emails to and from LO counsel .4; review court order and email to R Walker re error .1; emails and call with client .5; emails to and from Bunn on bill stuffer .2;	5.3	
6/19: Compare Mutual Water Company Lists names and addresses against class list and annotate same 2.7	0	2.7
6/20 Emails to and from RZ .1;	.1	
6/22: Landowner conference call 1.0; extensive analysis of prior filings and pleadings and commence preparation of summary of same 7.2; calls to and from DOL re DQ and issues for consolidation .4; call from class member .2; numerous emails to and from LO counsel .4;	9.2	
6/22: Continue work on editing, cleanup and checking of class database 8.1; conf with MM re same and questions .2;		8.3
6/23: Call with Tootle .7; emails to and from Dougherty .1; continue analysis re prior filing relevant to DQ and consolidation .7; conf. With DOL re DQ and case strategy issues .5; call from Lemieux re DQ .2; email Moore .1; research on LASC website re prior filing .4; same for Kern County .1; evaluation re class notice .5; emails to and from Lemieux .1; brief research on consolidation .4; email to Hedlund .1; preparation and revision of long letter to purveyors and continued analysis of prior filing for same re major issues with case posture 6.2; email to Joyce and Zimmer for help with same .2; emails to and from RK .1;	10.4	

6/24: Call with Joyce on prior case events and strategy for settlement .7; emails to and from Kuhs .1; long email to DOL on case strategy .5; prepare notice .4; emails to and from Bunn .2; call with same .7; call with Sloan and Zimmer re settlement, trial, motion to dismiss and classes and possible physical solution .9; call from Rebbecca Bon for Boron .1; commence review of 12/5/05 transcript .2; review hearing transcript from 2/17/06 and related orders re status of pleadings .5;	4.2	
6/24: Continue work on editing, cleanup and checking of class database 6.9; conf with MM re same and questions .5;		7.4
6/25: Substantial revision to long letter and completion of analysis of pleading defects for same 4.5; email to LO counsel re same .1; emails to BJ .2; email with Walker .1; emails with SH re notice .1;	5.0	
6/26: Call with Joyce re letter and Doe issues .3; research on impact of wrong summons on defaults .4; call from Kuhs re handling class, US, and pleadings .7; conf with DOL on DQ and letter and case strategy .4; emails to and from KL .3; research on Doe issues and CCP 583.210 1.2; revise and finalize letter to Dunn et al .8; review of prior hearing transcripts for DQ reply 1.0; review Fife email on Hedlund and class website / email to RK .1;	5.2	
6/22: Further work on editing, cleanup and checking of class database 7.3; conf with MM re same and questions .2;		7.5
6/27: Review cases on section 474 and 583 re Does .6; long memo to DOL, BJ, and Kuhs re analysis and handling of this issue 1.0; emails to and from DOL on points for reply brief on DQ motion .5;	2.1	
6/28: Emails to and from DOL re reply and pleadings .4; review chart from Kuhs .1; emails to RK on strategy issues .3; emails to and from DZ .3;	1.1	
6/29: Call with Sloan re handling motion to dismiss .5; emails to and from Hedlund .1; emails to and from RK and DZ re class issues .2; review and markup of reply brief .6; email to BJ et al .1; review revised proofs .1; email to and from Sloan .1; call to Leininger .2	1.9	
6/30: Call with DOL on Roe problem .2; analysis of Willis pumper list and Roe list .3; commence letter to Dunn re service problem .5; several dozen emails with LO counsel re class and litigation issues 1.3;	2.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>115.7</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>108.4</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: May 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
5/1: Calls from 2 potential class members .3; prepare response to motion to decertify, conf with DO and revise same 1.8; long email from Moore .1;	2.2	
5/2: Travel to and from Antelope Valley for survey of class list properties with client 6.1; emails to and from client and DOL .5; emails to and from Ukestad and Dougherty re mutuals .3;	6.9	
5/3: Emails from client .1; review of four databases and research on property indentities 1.8; download and review photos, cross reference vacant properties on class lists .3; letter to Moore 1.8	4.0	
5/4: Drafting MDM declaration and ex parte re halting class notice 4.6; revise Moore letter .3; emails with client .1; landowner conference call .7; calls to and from Moore .6; prepare Wood declaration and email to same .2; calls to and from High Desert re pump .2;	6.7	
5/5: Prepare ex parte application 1.5; emails to and from Dougherty et al .1; email to Moore .1; meeting with Moore and Dunn 2.4; emails to and from client and DOL .3; prepare stipulation and order on notice and transmit to Dunn and Moore 1.4; call with Dunn and emails to and from Moore .2; research Justice Robie .3; prepare VSC statement .3; call with Lancaster Water president .2;	6.8	
5/6: Prepare for hearing .3; participate in conference call .6; emails to and from client and DOL .4; emails to and from Dunn and Moore .4; email to Thompson .2; call from class member .3; redraft notices .6; emails to and from Hedlund, Dunn, John U, Moore, Fife, Lemieux 3; email to DOL on task list .2; email to TT and Dunn re pumper questions .2; review Willis spreadsheet . 2; review court orders .1;	3.8	
5/7: Call to Dunn and email to DOL .2; review of cases on control of EC 730 expert .4; meeting with DOL on case strategy .3;	.9	
5/8: Review small pumper Willis forms and cross reference with spreadsheet .8; conf with DOL re notice changes and review same .2; call with Dunn and email to landowners re expert .3; call with Kuhs re expert .2; call from Thompson and email to Dunn .2; review Thompson changes and email to Dunn .2;	1.9	
5/11: Emails to and from D counsel re meeting .1; emails to and from Dunn .1	.2	

5/12: Prepare expert cost allocation motion 1.8; many emails to LO counsel and JD re expert .6;	2.4	
5/13: Call from Dunn .2; research and analysis on opt in issue 1.0; emails to and from Fife and review his comments .2; phone call from class member .2; email from Mutual and respond to same .5; emails to and from Fife .3; emails with Walker .1; many emails re lists for mutual .8; email to Boyd re notice .1;	3.4	
5/14: Emails to and from Garner et al on class problems .2; emails to and from John U .2; many emails to counsel re class notice issues .2; email to Walker .1;	.7	
5/15: Conference with DOL on notice problems .1; all to Garner .1; analysis re handling other mutuals on list .3; emails to and from Zimmer .1; review Sheep creek motion papers .5; many (20) emails to counsel re class issues .9;	2.0	
5/16: Draft email to Dunn .4; emails with JU .1; email to and from DO re class issues .3;	.8	
5/18: Prepare ex parte application to stay class notice 3.8; email to DO re PO .1; email to LO counsel re discovery issues .4; emails with client and DO re notice .2; call from Dunn, memo to file .3;	4.8	
5/19: Many emails re settlement and review RZ matrix .3;	.3	
5/20: Hearing on motion and memo re same .4; 15 emails with counsel and parties re class notice and mutual lists .6;	1.0	
5/21: Emails to and from Dunn .1;	.1	
5/24: Emails to counsel re shareholder lists .5; review PO re lists .3;	.8	
5/26: Prepare subpoena to WFF .3; research on public records and attention to service instruction on same .3; emails and from Fife re WFF .3; emails with Dunn .2; emails with client .2; email from TT .1; review MF comments on notice .1;	1.5	
5/27: Revise small pumper notice and questionnaire 1.4; prepare proposed order re same .2; email to Dunn re notice .3; emails to and from client .3; many emails with counsel re notice .6; email to Dunn re list problems .1; emails with LO counsel re settlement .3;	3.2	
5/28: Calls with Dunn and client .7; review motion to dismiss XC .3; finalize PO .1; attention customer list, email to counsel .2;	1.3	
5/29: Call with Dunn and Leininger, conference call with court 1.4; call to DOL .2; email to and from DO re motions .2;	1.8	
5/30: Emails to and from client and DO .2; emails with JU re lists .1;	.3	
5/31: Emails to and from client on Nebeker meeting .3; emails with client re GN issues .1; review mutual lists and cf with class list .4;	.8	
<b>TOTAL ATTORNEY HOURS</b>	<b>58.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: April 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
4/1: Preparation of proposed order .5; review filings and prepare for hearing on TRO 1.1; call with Zimmer .2; review and analysis of current version of group discovery .6; email to client .1;	2.5	
4/2: Travel to and attend discovery meeting 3.6; hearing on TRO .5; call from Jim Nye .2; call from client .1; call with Zlotnick .2; email to Moore et al. .1; email from Garner .1;	4.8	
4/3: review minutes from LADWP stakeholder meeting .2;	.2	
4/6: Emails to and from Fife and Zlotnick .2; call with Dunn and memo re same .8;	1.0	
4/7: Emails re settlement issue .3;	.3	
4/8: Letter to Dunn .4; call from Lemieux and research on Nebeker anti-class publications .8; emails to and from Dunn .3; long email from client .2;	1.7	
4/9: Call with client on settlement issues .5;	.5	
4/11: Review Fife email on meeting .2; email from Fife re Nye .1;	.3	
4/14: Emails to and from RK re handling expert motions .3;	.3	
4/15: Review revised uniform discovery .4;	.4	
4/16: Emails and call to and from Zlotnick and Kalfayan .2; prepare status declaration including review of file materials .7; review opposing papers and other filings re expert motion and preparation of reply brief 1.0; email to clerk re TRO .1;	2.0	
4/18: Emails re discovery .1;	.1	
4/20: Email to Dunn .1;	.1	
4/21: Review uniform discovery to PWS .2;	.2	
4/22: Conference with Leineger re settlement 1.5; email to same .1; conf with DOL re hearing and settlement .3; emails to and from Aluki re class member .3;	2.2	
4/23: Review JD decl .1;	.1	

4/24: prepare for and attend hearing on expert motion, jury trial, and other class issues 3.0; review court orders and preparation of order re expert motion .3; review answer and XC of Joyce .2; status email to TT .1;	3.6	
4/27: Preparation of order re class notice service .3; landowner conference call .6; call from RK .2; conf with DOL re strategy .2; emails to client .1; email to BBK re class list .2; review AVEK draft .2;	1.8	
4/28: Calls from several class members and counsel re hearing .5; emails with BJ .1; review class list .4;	1.0	
4/29: Emails to and from Hedlund .1; t/c call with Hedlund and Dunn and conf with DOL on doubling of class size 1.1; calls with client re same and settlement .7; calls from landowner counsel re VSC .4; 15+ emails with LO counsel re VSC issue .9; long email to client .1; email to BBK re class notice .4;	3.7	
4/30: Call from Fife .2; emails to and from clerk .1; prepare draft of Dunn letter 2.1; call with Dunn .1; call from Sloan .2; emails to Dougherty and client .3; calls to same .1; calls and emails with client .4; emails to and from Welker .1; review transcript of last hearing .2; review joinders and Fife motion .5; revise Dunn letter .4; review ex parte to decertify .3; legal research on Fife standing to decertify 1.3	6.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>33.1</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# uyLaw Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: March 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
3/1: Emails from BD, RK and Fife re notice .2;	.2	
3/2: Emails to and from LO counsel on class issues .2; call with Joyce .4; review Reply of Bolthouse .1; conf. call with LO counsel .9; research on issues related to potential withdrawal .8;	2.4	
3/3: Review minute order .1; meeting with S. Reed of Veritext reporting agency and analysis re: online web site for future depositions .7; review RK expert motion .2;	1.0	
3/4: Emails to and from RK and DZ re: class issues .4; prepare letter to purveyor counsel, circulate same, and finalize .5; review cases on Evid code 731 and 730 and prepare for hearing tomorrow 1.5; emails to and from LO counsel re: common discovery and CMO .4; work on PMK depo notices .3; review US opposition to motion .1; many emails to LO counsel re strategy issues .5; review US opp .1;	3.8	
3/5: Fly to San Jose and argue expert motion and conference with Dunn re class notice and settlement 7.3; numerous (15+) emails with LO counsel and DOL re further handling of small pumper class .5; conference call with Dunn and Garner re settlement .3; review order and email to court on error, review new order .1; email to Garner re settlement .2; email to client .4; many (20+) emails with LO counsel re settlement and class issues .6;	9.4	
3/6: Call to Dunn re settlement .1; emails to and from LO counsel re discovery and common defense issues .2; call to Thompson re renewed motion .1; review and markup of uniform discovery .5; emails to and from DZ re expert .2	1.1	
3/8: Emails with RD re class issues .1; emails to and from client .2;	.3	
3/9: Emails with LO counsel re class issues .2;	.2	
3/10: Call from RK .3; read Ronert park case .3; email to LO counsel on discovery and CMO .5; call with Joyce on discovery meeting .2;	1.3	
3/11: Review Veritext proposals .2; email to counsel re same .3; emails to and from Fowler re mediation .3; emails with Garner .1; email to Walker .1;	1.0	
3/12: Emails re discovery with LO counsel .2; review RD discovery .1;	.3	
3/13: Review approval of revised class notice .1;	.1	

3/18: Review uniform discovery .3; emails from LO counsel re same .2;	.5	
3/19: Emails to and from DZ re Fife issue .3; email to and from Fife re town council issue .6; emails with DO and DZ re handling same .5; email to PWS re Fife issue .2; many more emails with MF and DZ re common client problem .6; review Bunn discovery .2; review handouts for meetings .1;	2.5	
3/20: 30 emails to and from DZ, MF, client, RK re ethics and class member contact issues 2.1; email to and from suppliers counsel .1; call from Weeks .2; research on contacting class members post certification without class counsel consent 1.5;	3.9	
3/21: Emails with DO and Willis counsel re Fife issue .2;	.2	
3/22: Conf with DO re handling MF meetings .2;	.2	
3/23: Preparation of draft settlement agreement 4.7; emails to and from clerk on ex parte .1; call with Kalfayan .2; emails to DO re settlement issues .3; emails with Dunn re meeting and MF .5; emails with BW re meeting .2; review KL letter .1; email to client re Gene .1; email to BBK re settlement .1;	6.3	
3/24: Settlement meeting 3.5; research on ethics issues with Fife solicitation .6; emails with client re AGWA .2; emails to and from BW re same .1; email to Reed re proposals .3;	4.7	
3/25: Research on appellate issues affecting possible settlement .7; emails to Joyce and review coordination order .1; prepare and revise settlement demand letter to Moore 2.2; conf with DOL .2; email to and from Garner re larger pumpers .3; emails to and from DO re class problems for settlement .4; review coord order .1; email to TT re status .1;	4.1	
3/26: Call with Dunn re settlement .3; conf with DoL .2; emails to and from Garner .1; analysis re settlement issues .3; call with client on settlement .3; redline Entrix proposal and call to TT re same .6; prepare TT declaration .5; revise settlement letter .2;	2.5	
3/27: Emails to and from client re settlement .3; call with Dunn re same .4; modify letter to Moore and email to Dunn and Garner .5; calls to class members re Fife meeting .2; call with Joyce .2; analysis re handing future fees in settlement and conf with DOL .2; calls to class members re: Fife meeting in February .3;	2.1	
3/30: Revise Moore letter and email to Dunn/Garner .3; call with Wayne Scott .1; call with Jim Nye .5; emails to and from Garner and Dunn .4; attention to ex parte .2; preparation of renewed motion to appoint expert and supporting declaration, review Olsen case 2.9; finalize Moore letter and send same .9; emails with DO re motion .2; preparation of ex parte app for TRO .5;	6.0	
3/31: Email to Moore et al .1; research and preparation of ex parte motion on TRO re AGWA and MDM declaration 3.5; emails to and from Fife and DO re TRO .3; review PWD discovery responses .4; emails with RGK .1;	4.4	
<b>TOTAL ATTORNEY HOURS</b>	<b>58.5</b>	
<b>TOTAL PARALEGAL HOURS</b>		



# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: Feb 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
2/1: Call with client re decl. .2;	.2	
2/2: Review 2 postings .1; emails to and from landowner group re Anaverde and conf call .2; call with Dunn and Hedlund and memo re same .6; landowner conf. call .5; prepare Wood declaration .5; email to RK re depo group deal .1; call from class member .1;	2.0	
2/3: Emails and call with client .3; emails to and from Court .1; revise Entrix proposal .5; email to RK re docs .1; emails to and from Waldo and Fowler re settlement .3;	1.3	
2/4: Review revised Entrix proposal and call with Thompson .2; call with client .2;	.4	
2/5: review and execute stip from Sheep creek .1; calls with to AV landowners re small pumpers class .2; brief review of rough class database .3; commence motion for appointment of expert, including legal research on section 730, 731, self-help, 1021.5 4.8	5.4	
2/6: Analysis of database for class notice .2; call with Hedlund re same .7; email to John U .1; review and summarize 3 prior water adjudication judgments for application to proposed settlement in Wood case 2.4; long call with RK on website problems and other class issues .5; emails to and from same re notice errors .2; further legal research for expert motion 1.4	5.5	
2/8: Emails to and from Dougherty .1; email from Fife .1;	.2	
2/9: Modify Wood declaration .2; call with same .2; prepare and revise Thompson declaration .5; phone call with same .3; review proposed joint discovery .4; conf call with LO counsel .5; email to court .1; complete motion for appointment of expert 5.2; email to RK re website .1; prepare Doe amendment .1; email to Lemieux .1;	7.7	
2/10: Analysis of PRA request for info to support 1021.5 motion .4; commence letter to PWS re settlement 1.4; review PWS supp jury trial briefs and research re same .7; review draft joint RFPs from RK .3; email to court re website problems .1;	2.9	
2/11: Emails to and from LO counsel re sheep creek motion .1;	.1	

2/12: Extensive revisions to settlement letter to PWS counsel .6; email to Dunn re outstanding agenda .1; emails re discovery conference .2; call form class member .2;	1.1	
2/13: Long call with Lemieux re settlement .8; review existing settlement proposal in this case .2; email to LO counsel re handling of joint discovery .3;	1.3	
2/15: Call with client on settlement analysis and case prep issues 1.0;	1.0	
2/16: Revise class notice 1.8; emails to landowner counsel re expert motion .3; email to Dunn and Bunn re notice .1; emails to numerous LO counsel re settlement .3; email to RK .1;	2.6	
2/17: Emails to and from Dunn .1; emails to various landowner counsel .1; review and prepare comments on revised joint discovery 1.5; conf call with Dunn, Bunn and Hedlund and revise notice .8; email to DOL .1; email to Fife on class issues .1; calls with 2 landowners .3; call with S. Reed re: joint depo cost proposal .3; email to and from Fife re opt out .2;	2.0	
2/18: email to and from Hedlund .1; conf call with Heldlund and IT re website and email to DOL re same .6; revise notice .4; emails to and from Fife and DOL on expert issue .2; emails to and from Zimmer re settlement proposal .2; revise class notice and finalize same .4; emails to and from Haynes re website .1; emails to and from Fife re joinder and review same .2;	2.2	
2/19: Call with client on settlement issues .6; analysis re handling exemption and enforcement issues, and email to Dunn et al. re settlement issues .7; review latest round of revised joint discovery .7;	2.0	
2/20: Review CMC statements .1; commence CMC statement .3; emails to and from BBK re testing website .2; review Dunn Decl and opp to expert motion .3;	.6	
2/22: Commence research re reply on expert motion .5; review Nebeker email re settlement .1;	.6	
2/23: Complete CMC statement draft 1.2; review dunn declaration re class service .1; email to purveyors counsel .1; call with Dunn and Hedlund .2; emails to and from defense counsel .2; review AGWA and email re same .1; supplement and revise CMC statement .5; call with Bunn and revise CMC statement .4; commence review of PWS docs forwarded form RK 1.6;	3.8	
2/23: Prepare summary of D40 records, PWD records 7.1; conf with MM re same .3	0	7.4
2/24: continue review of PWS docs 2.3; research on Section 730 including review of three cases cited in PWS opp 1.0; commence drafting of reply brief 1.1; emails to and from PWS counsel re settlement call .1; review Anaverde CMS and email to Huang .2; call from class member .2;	4.9	
2/24: Continue summary of water supplier records 8.5	0	8.5
2/25: Conference call with PWS counsel re settlement and expert motion .7; continue drafting reply brief .3; review AGWA jury reply brief .2; commence preparation of content for website .3	1.5	
2/26: Complete reply brief on expert motion 3.7; phone call with class member Lawrence .5; review CMC filings .1; review Willis CMC statement .1;	4.2	

<b>2/27: CMC telephonic 1.2; email to water counsel re settlement .1; emails to and from DZ and RK and JD .1; email to and from client .1;</b>	<b>1.5</b>	
<b>2/28: Prepare and file proposed order .2; review Dunn letter .1; continue review of purveyor documents and summary of same 3.9</b>	<b>4.2</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>59.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>15.9</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: January 2009

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	AMOUNT
1/1: Emails to and from landowners .3; review older water cases for information on jury trial issue 1.2;	1.5	
1/2: review CMC statements and purveyor brief re jury trial .4; prepare CMC statement and modification of DOL insert on jury trial, including research re same 1.5;	1.9	
1/5: Attention to responding to court' request for jury trial issue .2; email and call with Waldo, mediator .1;	.3	
1/6: Email to R. Walker .1; numerous emails to landowner counsel .2; additional research on jury trial issue and prep for hearing 1.2; call with purveyor counsel re: class notice .3; calls from 2 class members .5; call with Hedlund .7;	3.0	
1/7: Emails to and from landowner counsel .2; participate in LO conf call .7; email to Waldo .1; revise class notice and email to Dunn and Bunn .4; email to LO counsel re: motion for preliminary injunction problems .3; emails to and from Kuhs .1; call with Leggio and email to same re mediator Waldo .4; review and analysis of avgroundwater website and email to RK re problems .4; revise and file class notice .1; call with client .5;	2.7	
1/8: Email to and from clerk .1; research re small pumpers who have received the Willis notice, including email with client .5; phone calls from 3 class members .5; review objection to notice .1; call form class members .3;	1.5	
1/9: Prepare for CMC including legal research .8; call from class member .2; emails to Dunn and RK re problems with boundary map .2; emails from LO counsel on jury issue .1; attend CMC 2.5; call with class members 1.3; emails to and from Dunn .1;	5.2	
1/10: Emails to and from Zimmer .1;	.1	
1/12: Research on website emails to RK, Bunn and Dunn re problems with boundary .8; call from class member .2; review minute order .1; research and interviews with potential experts 2.7;	3.8	
1/13: Email to and from Kuney .1; phone call with client .3; continue research and interviews for potential experts in 3 areas 3.2;	3.6	

1/14: Emails to and from Dunn on Leever .1; emails to and from Fife and Thompson re expert retention .2; phone interview with Thompson .6; research on ethical issue of same person in both classes 1.8; email to DZ and RK re same .2; review Lemiux letter .1;	3.0	
1/15: Emails to and from LO counsel .1; call with Thompson .4; review Thompson CV .2;	.7	
1/16: Call with Fife .5; review settlement proposal, phone calls re same .4; talk with DO re settlement proposal .1; call with client .4; email to leggio and green .6; emails to and from client and DO .3; emails to and from Thompson and Fife .2; emails with Dunn .1;	2.6	
1/18: emails from DZ and Hedlund .1;	.1	
1/19: emails to and from Thompson .2; calls to and from five class members .8;	1.0	
1/20: Emails to and from Dunn .1; call with client .2; review several filings of this date .2;	.5	
1/21: Legal research on self-help .7; review settlement proposal and call LO counsel .2; call with Dunn and email re same .3; numerous emails from discovery meeting handling .3; preparation of matrix of discovery propounded and not fully answered 1.5; prepare rough list of categories of comprehensive discovery .7; call with Thompson on budget issues and case handling .8;	4.5	
1/22: Call with Thompson on budget and scope of work .5; call with LO principals on settlement issues .2; prepare for meeting at Wildermuth, including review of declaration and database files .8; travel to and attend meeting 3.8; memo re same .4; review first draft proposal by Thompson .1;	5.8	
1/23: Conf call with landowner principles .7; research on correlative rights .5; email to expert .2; analysis of water district boundaries on internet against basin boundary and email to counsel re export of water 1.4; call with Joyce on jury trial issue .4; emails to kalfayan .1; analysis re handling Phelan CSD .2; research on use of water outside basin on prescription claim and potential for prelim. Injunction against same 1.1;	4.6	
1/26: Legal research on jury trial and issue related to purveyors brief 3.4; supplement and edit brief 1.6; review of other landowner briefs .5; prepare for discovery meeting, including preparation of chart of pending discovery 1.6; calls with 2 potential small pumpers .3; emails to and from Lawson .1; email to clerk re website trouble .1; calls to and from several class members .7	8.3	
1/27: Travel to and attend discovery and case management meeting, and meeting with landowner counsel thereafter 4.6; email to Huangfu re: landowner group .3; review draft CMO .2;	5.1	
1/28: Review RK letter and last hearing transcript .2; call with client on last settlement meeting .3; call with three class members .7; calls to and from several class members 1.2;	2.4	
1/29: Email to PWS counsel re depo costs splitting .2; emails to Lemiux and Bunn re settlement .3; review settlement proposals .3; emails to and from Dunn re Leever meeting .3;	1.1	

<b>1/30: review RK letter .1; emails to and from Dunn .1; call with six class members 1.2; research and analysis on motion for preliminary injunction, specifically public use doctrine in water taking context 2.4;</b>	<b>3.8</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>67.1</b>	

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: December 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
12/1: Email to Markman .1	.1	
12/2: Emails to D counsel re settlement and modify same .5;	.5	
12/3: Review and analysis of AGWA's MILs .5; emails to D counsel re settlement, analysis of comments, phone calls and modify same 1.4;	1.9	
12/6: 15+emails to D counsel re settlement, analysis of comments, phone calls and modify agreement 2.7; call with client re agreement changes .8;	3.5	
12/7: Emails with WL re agreement .2; emails with Trager re requested changes .9; revise draft agreement, further emails 1.2;	2.3	
12/8: Emails and call with Trager 1.0; emails with DE, memo to file .2; review and analysis of Bolthouse disco responses .4;	1.6	
12/9: Review and analysis of defaults and service cf with class database, memo re same 2.7; ex parte notice email, research same .2;	2.9	
12/10: Review PPH brief .1; review app to extend trial brief and objection .1; review US opps .2; review Zimmer MIL .1; emails with DE re settlement .2; email to D40 re settlement, conf with DO, send .4; emails to and from client .2;	1.3	
12/11: Long email to client re settlement issues 1.4; call with client to discuss settlement changes .8;	2.2	
12/13: Emails and call with client re agreement issues .9; emails with MF re WFF .1; call with DE .2; revise agreement 1.0; email to D counsel .2;	2.4	
12/14: Emails and call with JM .2; emails and call with Trager .7; email to DE re agreement .2; review AGWA MIL 4 .1; review pretrial statements .2; review opps of D40 to AGWA MILs .2; review leave to file expert design. and opps .2; prepare for hearings 1.2;	3.0	
12/15: Travel to and attend pretrial conference, memo to file re same 4.1; review RK outline .1; emails to and from LO counsel re trial issues .5; emails to and from D counsel and several revisions to agreement .5;	5.2	
12/16: Emails with D counsel, draft long email to EG, conf with DO, revise and send 1.0; emails with DE re agreement .3; email to JM re same .1; revise agreement and email to counsel re same .4;	1.8	

12/17: Email to to WW re motion .2; email to and from JM .1; emails with WW re settlement .1; detailed review and editing of agreement, email to D counsel re same 1.2;	1.6	
12/19: Legal research for MIL 1.7; review prior order, transcript and depo testimony for MIL, and commence drafting same 2.8;	4.5	
12/20: Review and analysis of voluminous trial filings and exhibits, prepare summary memo re same 2.3; complete, conf with DOL, and revise MIL 1 1.0; prepare summary of MILs and arguments for each 2.5; many (20+) emails and call with Reed re online depo issues, exhibits, trial and transcripts .7; email to and from CM Jones and analysis re class membership issue .4; 14 emails with CM Brewer re property issues and class membership .6; emails to and from MF re MIL.1; emails to and from MF re Del Sur and online investigation of WC 106 hearing .5;	8.1	
12/21: Review RJN and analysis re attacking same .3; emails to and from West .1; review client collection of USGS material, analysis and summary of same 1.7; call with client re trial issues, water level analysis, and maps .8;	2.9	
12/22: Email to DZ re willis class contact .1;	.1	
12/27: Email to D counsel re settlement .2; emails to and from Trager and Bunn .1;	.3	
12/28: Emails to and from client re water level, and analysis of map .3;	.3	
12/29: review Joe S ruling .1; email to RWalker re hearing .1; emails with same re ex parte details .1; emails to LO counsel and Dunn re ex parte notice .1; emails and call with MF .2; prepare and file objection to same, conf with DO and revise and file 1.1; emails with MF re same .1; email with LO counsel re ex parte .2; email with RW re same .1; review emails on notice and emails with SH .1; emails with DO re Joe situation .2; many (30+) emails with LO counsel re handling Joe situation .8; conf call with same re same, memo to file .7; email to and from RWalker re hearing .1; review Fife objection .2;	4.2	
12/30: Email comments to MF .1; 25+ emails and calls to and from LO counsel re handling Joe situation 1.0; prepare and revise ex parte application re Joe S, conf with DO and file same .8; review opp, Joe S testimony, legal research and prepare reply brief on MIL 1 3.8; email to RWalker re calendar issue .1; 30+ emails with LO counsel re Joe S handling .8;	6.6	
12/31: Hearing on ex parte app and memo to file .4; review various recent trial filings .3; emails from LO counsel re trial .3;	1.0	
<b>TOTAL ATTORNEY HOURS</b>	<b>58.3</b>	
<b>TOTAL PARALEGAL HOURS</b>		



# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: November 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
11/1: Review and analysis of expert report, docs produced, voluminous USGS reports and data, research re Durbin articles, and prepare outline for depo of same 7.9;	7.9	
11/2: Email from Fowler and call with same on settlement language .8; complete prep for Durbin depo 4.1; emails with DE re settlement .1;	5.0	
11/3: Email from West and review framework docs .3; call to same .5; attend PG call on settlement, memo to file 2.6; commence review of PWS data production, analysis of same, and preparation of summary memo and excel data summary re same, cf USGS report data 6.5	9.9	
11/4: Emails with client re settlement issues .2; review and markup of updated accord docs, call to Fowler .7; draft long settlement letter to EG, conf with DO, revise letter 2.2; emails with DE .1; call to client .2; commence preparation for Joe S depo, review of docs and outline for same 4.2;	7.6	
11/5: Review PG materials .3; call from DE .1; attend PG call on settlement, memo to file 2.4; emails with Trager .1; continue data analysis project and cross referencing with summary expert report tables, update master analysis memo 4.8;	7.7	
11/6: Continue data analysis project and cross referencing with summary expert report tables, online research to pull down many cites in report, update master analysis memo and commence outlines for trial 8.8;	8.8	
11/7: Continue data analysis project and cross referencing with summary expert report tables, online research to pull down many cites in report, update master analysis memo and exam outlines for trial 5.8;	5.8	
11/8: Email from West re framework and call with same .4; review and markup of current document .7; continue data analysis project and cross referencing with summary expert report tables, update master analysis memo and commence outlines for trial re same10 5.6;	6.7	
11/9: Continue data analysis project and cross referencing with summary expert report tables, update master analysis memo, and exam outlines for trial re same10 .6	10.6	
11/10: Review West memo and call to same .4; continue data analysis project and cross referencing with summary expert report tables, update master analysis memo 5.2; attend PG call and supp memo 1.9;	7.5	

11/11: Review and analysis of USGS data, expert data and prepare basinwide analysis re water levels from 1980 to present, summary memo re same and highlight errors in expert report re same 5.9; continue data analysis project, literature review, cross referencing with summary expert report text, update master analysis memo 3.2;	9.1	
11/12: Preparation for Joe S depo, and outline for same 2.4; review Willis objection .1; continue review and analysis of water levels, summary memo re same and highlight errors in expert report re same 6.2; emails and call with Reed and LO counsel re depo issues .5; review and analysis of accord docs, markup framework, call to West .6;	9.8	
11/13: ; Continue review and analysis of water levels, summary memo re same and highlight errors in expert report re same, work up master list of expert report issues, supplement trial outlines 6.9; review PPH discovery response .1; review Dunn letter, email to DO .1;	6.9	
11/14: Review Joe S prior testimony and complete depo outline for Joe 3.8; email and call with Reed re depo issues .3;	4.1	
11/15: Travel to and attend Joe S depo 9.1; review cms statement and emails with DE .3; summarize Joe S notes .8	10.2	
11/16: Travel to and attend Joe S depo 9.6; email to Bunn et al .1; review amended CMS statement of 40 .1;	9.8	
11/17: Emails and call with client .4; review and analysis of Bunn outline .4; call to West re same .5; prepare for hearings 1.4; emails with EG re settlement .2; summarize Joe s notes .6;	3.5	
11/18: Travel to and attend hearings on willis and other motions and status conf., memo re same 4.5	4.5	
11/19: Emails from Bunn and review doc .2; email from West and review settlement offer, markup of same .7; legal research on finality of class judgment 3.7; draft memo re same and email to RK and DZ 1.4; participate in PG call and memo to file 1.5; long email from West and review new offer .3; email and call to same re issues .4; conf with DO .2; many (14+) emails with West re offer changes .9; call with client re same .3; review MOs .1; further emails with RK re finality issues .4; emails with DE .1;	10.2	
11/22: Conf with DO and client, email to West on objection to accord .7; call from Waldo re same .5;	1.2	
11/23: Email from West and call with same 1.0; review revised PG offer and call to West and client .4; emails with D counsel re settlement .1; prepare and revise PG letter .4	1.9	
11/24: Emails with West and JM .2;	.2	
11/29: Email from West re offer and review numerous attachments .7; many emails to and from same re settlement strategy and issues .9; review Widermuth changes .1; review hydrus info .1;	1.8	
11/30: Legal research on issue of failure to include opt out in settlement notice 3.8; prepare and revise brief re same 1.7; review Willis stip .1;	5.6	
<b>TOTAL ATTORNEY HOURS</b>	<b>156.3</b>	

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: October 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
10/1: Participate in PG meeting and memo to file re same 4.2; emails with client .2; emails with WW re taking wood settlement to board .2; emails DZ re motion .1; review motion to subst .1; review and analysis of AV econ impact report and markup same .7; call to Fowler .6;	6.1	
10/4: Email to DE re class settlement approval .1; review MO and email to Walker .1; emails with Fowler .1; review Hoch filing .1;	.4	
10/5: Emails from client and review memo re settlement .3; emails with RWalker .1; email to Trager re class agreement and call with same .5;	.9	
10/6: Review stip re withdrawal .1; review email re Antonovich meeting .1;	.2	
10/7: Call to Fowler re meeting with supervisor and further steps .8; emails with LO counsel re depositions .3; review schedule .1;	1.2	
10/8: PG call 1.2; email D40 on settlement .1; email from Fowler re settlement .1; attention to identifying Oberdorfer input to expert report, summary and review of prior testimony 2.4; commence outline for Oberdorfer and review of data and report 4.2	8.0	
10/11: Emails with EG re settlement .1; review Fowler email and Edwards letter, markup same, and email to Fowler .4;	.5	
10/12: Review numerous depo filings .2; call with Trager .8; emails with LO counsel re depositions and review calendar .3; emails with Reed re cost proposal .4;	1.7	
10/13: Emails with Garner re settlement dragging .2; review depo cost proposal .1; 30+ emails on depo pricing issues .5; analysis and review of Veritext proposal and call with Reed .5; call with client re status .4;	1.7	
10/14: Call with Reed re proposal .2; call with client .2; review supervisor letter and email to DO .1; review email re PWS refusing to share reporting costs .1; 15+ more emails re same .3; emails to LO counsel re Wildermuth .1; email to BBK re refusal to cost share .1; conf with DO .1; email to and from Wellen re costs sharing .2; emails with MF re same .2; many emails with Reed re handling proposal .3; emails with Trager re agreement changes .4;	2.2	

10/15: Review Dunn depo notices and amend memo .2; review and markup client letter to supervisor .2; emails to and from Wellen .2; 30+ emails re handling depositions 1.2; emails with client .2; long email to WW, conf with DO, revise and send same 1.0;	3.0	
10/17: Emails with client .2; email with BH re depositions .1; attention to review and analysis of prior Widlrmuth docs, expert report, and prepare deposition outline for same 4.8;	5.1	
10/18: Review depo notices and amend memo .2; 20+ emails re handling depositions .6; call and email to DE .1; review West letter and call to same re accord .6;	1.5	
10/19: Travel to attend Wildermuth depo 9.3;	9.3	
10/20: Emails with SH .1; emails with Bunn .1; call and email with DE .1; continue analysis and prep for Oberdorfer depo 3.5	3.8	
10/21: Review depo notices .1; participate PG meeting 4.3; summary memo re same .3;	4.7	
10/22: Participate in PG meeting 4.3; supp summary memo .2;	4.5	
10/23: Emails with LO re depositions .1;	.1	
10/25: Emails with client .2; call to West on status of many drafting issues .7;	.9	
10/27: Review RZ reply re willis .2; participate in PG call, memo to file 1.2;	1.4	
10/28: Review and summarize AV econ impact report .7; emails with Fowler re same .2; call to Fowler re numerous issues .8;	1.7	
10/29: Conf with DO re strategy issues .4; call with Fowler .5; prepare long draft letter to EG and email with Fowler re same 1.2;	2.1	
10/30: Receive West input on letter and revise same .2;	.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>61.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: September 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
9/1: Emails with client on agreement changes .1; review Waldo status email .1; review 4 cmc statements .2, email to DO;	.4	
9/3: Emails with classmember Reinhard .3; review 2 cmc statements and objection .2;	.5	
9/12: Emails with client on agreement changes .1	.1	
9/16: Review agenda and call in to PG meeting, memo to file 4.2; review and summary of expert notices and memo re calendaring .3; review RK motion for preliminary approval .2;	4.7	
9/17: Review of prop 218 memo and underlying authority .6;	.6	
9/19: Emails re depo notices .1;	.1	
9/20: Emails with EG re settlement .1	.1	
9/21: Emails to EG re settlement .1; email re LO with depositions .1;	.2	
9/22: Review opps to motion for approval .2; email with LO re depositions .1;	.3	
9/23: Emails to RWalker .1; emails with RK re motion .1; email to JD re Joe depo .1; emails with LO re depositions .2;	.5	
9/24: Review supp notice and oppositions .5; email with LO re depositions .1; emails with DZ re motion issues .3; review Rosamond dedesignation and call to DE .1; review West memo and call to same re accord .9;	1.9	
9/27: Call with client re status .6; review Wildermuth Chino report .2; emails with D40 and conf with DO .3; participate in LO call and memo to file re same 1.0;	1.9	
9/28: Email from DE re county status .1; attend LO conf call and memo to file .8; emails with MF re Long Valley .4; review Wright case .3; emails to LO counsel re depo issues .3; email to LO group re Leever depo .2;	1.9	
9/29: Review notice of related cases and online research re same .1; review new depo notices and update memo re same .1; review PG agenda, call to Fowler .8; call with client re status and settlement .4; review West email and PG documents, markup same .5;	1.9	

<b>9/30: Attend PG meeting and memo to file re same 5.1; review and revise settlement agreement and cf with Willis agreement 1.7; email to WW re same .2; review Dunn email on depos .1; review reply papers on approval and supp objection .2; emails with DZ re same .1; call with client on settlement .3;</b>	<b>7.7</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>22.8</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: August 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
8/2: Attend PG call and memo to file 1.3;	1.3	
8/3: Email from West and call with same .7; email from EG re settlement and re same .3; email to client re same .2; review Antonovich letter and email to West and LO .3;	1.5	
8/4: Emails with Dassler .1; emails with client re terms .2; call to same .2; email to PG re call .1; emails with LO counsel re same .1;	.7	
8/5: Emails with DE .1; long email to client re settlement issues, and redraft language re assessment .7; emails to and from Fowler and BJ re list of parties problems .5; email from West and call to same re drafting .5;	1.8	
8/6: Attorney call re accord and memo to file re same 1.5; long email from client and call to same re settlement issues .6; long email from Blum .1; review long DZ email .1; review Fife comments to accord .1; review accord comments from several parties .3; call with West re same .6;	3.3	
8/8: Emails with BJ and West re parties .2;	.2	
8/9: Email to Blum .1; numerous emails re accord comments .8; email to client re class settlement .3; call with same .8;	2.2	
8/10: Email and call to West re state role .3; email to EG .1; email from West on letter, review agenda and materials for PG call .2; review draft letter and email re change .2; revise class agreement and emails to client re same .7; call with EG and memo to file .5; participate in PG call, and memo to file 1.5; further class agreement revisions and email to client, call with same .6; create new class agreement and modify same 1.3; long email to EG re changes to same .4;	5.7	
8/11: Review BB accord comments .2; emails with DE .1; send comments to West .2; email to EG .2; emails to West and lawyer group re further issues .5; review DE draft brief .2; conf call with accord lawyers and memo to file re same .6; email to West re Robie .4; emails with EG .1;	2.5	
8/12: Sign off on letter .1; emails re call tomorrow .1; email from West re outsiders .1; call from West re accord issues 1.4;	1.7	

8/13: Accord attorney call, memo to file 1.5; call with Trager re Robie .4; call with Bunn .2; email to accord lawyers 1.0; emails with Moore .1; emails to and from Davis .2; emails with Green .1; emails with Trager re Robie .3; email to Waldo and Green re strategy .7; conf with DO .2; email to West re Palmdale .1; emails with Trager and EG re class agreement .1; call with Trager re problems with accord and related issues 1.2; email to and from Green re transferability .2; emails re mediation brief .1;	6.5	
8/14: Modify class agreement and email to EG re same .5; email to BBK re Robie .1; email to DE re brief .1;	.7	
8/16: Emails from counsel re Fowler email .2; review and markup of DE brief .4; email to same .2; review Fife brief and email to same .4; review RK comments to accord .2; email with feds, email to West .1; email to DE re Trager .2; email to Kuhs re accord .2; emails with DE .1; review Trager brief and call to same .4; email to Robie re class .3;	2.7	
8/17: Review PG meeting documents, markup several .5; emails with Fowler re same .2; participate in PG call 3.8;	4.5	
8/18: Participate in PG call 3.8; memo to file re same .4; review KL brief .1;	4.3	
8/19: receive and review Copo brief .2; emails re Siptroth .1; review Cal Water brief .1;	.4	
8/20: Many emails with West and accord lawyers re Robie .5; email from DZ .1;	.6	
8/21: Emails from counsel re Robie .1;	.1	
8/23: Email to West on expert issue .2; call from West re numerous issues for tomorrow .8; emails with EG .1;	1.0	
8/24: Travel to and attend Robie mediation 12.4;	12.4	
8/25: Review Fowler email on PG meetings .1; call to same .3; review West email on letter .1; review and markup of same.3; call to West .5; participate in PG call and memo to file re same 2.1; review Fowler agenda and Robie summary .1;	3.5	
8/26: Call from Bunn and email with same re depositions .2; emails with LO re same .1; participate in PG call and memo to file re same 4.5; emails with EG re class settlement .2;	5.0	
8/27: Emails with EG .1; call with same .1;	.2	
8/29: Email to and from client re class settlement .6;	.6	
8/30: Emails to and from EG re settlement 1.0; revise agreement .3; review cmc stmts .2; long email to client re settlement issues .8; call to same .3;	2.6	
8/31: Review cmc stmts .2; prepare cmc statement .4; emails with West re accord .2; emails with EG and revise agreement .3; long call with Trager re Robie and class settlement 1.3; emails with same .1	2.5	
<b>TOTAL ATTORNEY HOURS</b>	<b>68.5</b>	
<b>TOTAL PARALEGAL HOURS</b>		



# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: July 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
7/1: Emails and calls with client re accord language 1.8; review opps re expert motion .2; call to RK re same .2;	1.8	
7/2: Emails and calls with client re accord language 1.2; redraft accord sections 1.7; email to Waldo re same .8; call from West re accord issues .8; work on revised language and many emails to and from West re same 3.6;	8.1	
7/6: Email and call from West on fees .4; attention to drafting sections for same, legal research on 1021.5 issues, joint and several liability and good faith 3.9; email to DO re same and Willis fees .2; email to West re accord .6; review court order and email to West re strategy for handling same .4; review agenda .1; many more (15+) emails with West re strategy and handling of accord issues and language 3.2; review transfer order .1; email to PG re strategy .6;	9.5	
7/7: Travel to and attend meeting with West on accord and then PG mediation session 9.3; email to and from LO counsel re strategy .6;	9.9	
7/8: Travel to and attend meeting with West on accord and then PG mediation session 7.3; review Willis reply .2; email to client re Willis .2;	7.7	
7/9: Email from West re watermaster funding .2; research on tax issues on special assessment and feasibility of same 4.3; call to West re same and alternative approaches .7;	5.2	
7/12: Review DE cmc stmt .1; emails and call with West and Waldo re accord handling .6; long email to DE and LO counsel re handling settlement and accord issues .7; review BS markup .1; calls and emails from Lignon re Waldo team conf call .1; email to Waldo on strategy .3; emails to and from LO counsel re handling trial cont .2; conf call with Waldo et al .8; review final accord version and markup of same 1.5; call to West on technical issues .3; review and analysis of 8 technical comm reports from West, and summary of same 2.7; emails to and from DE on continuance and other issues .6; call with Tom Bunn and email to LO group .3; 49 emails (21 by MM) and 6 calls re accord, drafting issues, trial cont, strategy and related matters 3.9; 15+ emails with Waldo group re same 1.9;	14.1	

<p>7/13: Review cmc statements .3; many calls from all counsel re cmc, settlement and cont .9; emails to and from LO group re same .5; emails with US.1; review Fife draft .2; emails to and from DZ re dispute .3; long email to RK and DZ re conflict, trial and getting on board .5; call with LL and JD .7; summary email to LO group .4; further emails with DZ .3; emails with BS re conf call list .2; email to group re same .1; emails to and from West re accord stats .2; 10+ emails on call from Walker and 87% .5; email from West re accord disclosure, emails from 7 others .2; long email to PG re strategy and disclosure of accord .6; review Gene numbers and email to West re same .2; 15 plus more email to and from PG re accord disclosure .4; emails to and from West re same and strategy issues .3; emails to and from Joe F .1; prepare draft MM status decl re settlement and continuance, conf with DO and revise and file same, revise again and refile 3.4; emails to LO counsel re same .2; email to Entrix on billing .1; emails to and from West re call list and disclosure calling .2;</p>	<p>10.9</p>	
<p>7/14: Review PWS and Willis statements, email to DO .2; emails to and from West and PG .3; 50+ emails to and from counsel, LO counsel and PG re disclosure of accord and handling of same, including 4 calls 2.6; draft and revise supp MM declaration re settlement 1.2; call with BB re disclosure and board trouble .5; email to LO counsel re same .2; emails to and from LO counsel re same .2; email comments from West and LO re decl and revise same .3; call with BB re no consent .2; email to group re same .1; email to BB .1; email to PG re AVEK .1; emails with Bjorn re AVEK. 2; conf call with LO and Waldo group 1.2; prepare and revise Waldo decl., emails to all re same .7; emails and call to and from West re same .2; email to Rwalker re decl. .1; emails with Entrix re billing issues .2; email to D counsel re bills and ex parte .1; emails with Bjorn .1; email from DZ on AG opinion and legal research on ethical issues .7; further emails re same with DZ and PG .3;</p>	<p>9.8</p>	
<p>7/15: Emails with RWalker re hearing .1; prepare for hearing .5; hearing re continuance .6; email to Waldo re same .2; many emails to and from LO and West re further steps, strategy for cont. and AVEK 1.5; email to PG re need for lawyers .2; call to MMoore .2; and email all re Robie .2; emails from counsel re same .3; email to RWalker re ex parte .1; analysis re county witnesses and and prepare notice of witnesses 1.0; emails to LO counsel re same .2; attend PG meeting 2.1; review MO n/c; many (3-30+) emails to LO counsel re Dunn stories and AVEK truth, strategy for trial and next hearing 1.3; email to counsel re Robie .2; 15+ emails from same re same .4; emails with Riley .1;</p>	<p>9.2</p>	
<p>7/16: Email with LO re cost sharing .2; emails with Entrix .1; email to LO re court reporting deal .2; email to PG re hearing .2; emails with Trager .2; email to LO re conf call agenda .1; email to all re Robie on 11<sup>th</sup> .1; emails with Joyce .2; 35 further emails re cost sharing 2.3; emails re Markman .1; emails re lawyer selection for Robie meeting .2; further emails re conf call agenda and strategy .3; long email to DZ re settlement options and Long Valley .6; emails with DZ re same .2; review depo notice and comment to same .1; emails re CCP on experts .3; further emails re lawyer selection for Robie .4; email to and from RK re settlement .2; review new depo notice .1; emails re Wildermuth attack .3; emails with Dunn .1; 8 emails to and from West re strategy for Robie .8; conf call with LO counsel .8; review Willis settlement .3; emails to LO counsel re dealing with same .6; email to West on Willis .1; emails to and from LO re Willis .2;</p>	<p>9.3</p>	
<p>7/17: Emails to and from RZ re settlement .2; email to LO counsel re Willis agreement impact .5; review many emails from counsel .3;</p>	<p>1.0</p>	

7/18: Review 4 strategy emails .1; long email to LO group and West re strategy .7; email from DZ .1; emails with BD re willis .1;	1.0	
7/19: Further emails re Willis settlement .1; many emails with counsel re strategy issues .4; emails to and from Robie .3; review AV article .1; emails re limiting attendance .2; email to LO re accord problems .3; call with West re willis, avek, and accord issues 1.6; call from BBK and email to PG re mediation .1; email to US .1; call from Moore re problem with date email to BBK .1; emails to and from Sloan re willis deal .5; conf call with accord counsel, memo to file 1.2; emails re resting Robie .3; review Chino assessment law .1; emails with MMoore .1; emails re US water use .2; further scheduling emails .1; call with client .4; conf with DO .2;	6.1	
7/20: Emails with Moore .1; review Dassler email and costs memo .1; email to LO re nonpayment problem .1; prepare letter to all parties .2; emails to PG re same .1; emails with Dunn .1; emails with DZ .1; emails re ex parte .2; review draft ex parte .2; emails with JM and Palmdale .1; emails re changes to ex parte .7; review Durbin letter .1;	2.1	
7/21: Call with client re mediation .2; review ex parte .2; further emails re same .3; emails re Waldo contract .2; 15 plus emails re mediation strategy issues .4;	1.3	
7/22: Review PG watermaster documents, and markup same .8; review BB memo .1; participate in PG call, memo re same 3.8; emails with Trager .1; many (15) emails on ex parte .3; emails with Entrix re billing .1; email to and from LO counsel re PG question and Joe S .4; call with Dunn, memo to file .5; emails with Trager .1; 30+ emails re Robie strategy issues .8; review new Waldo contract .1; call to West re accord issues and Robie .5;	7.6	
7/23: Email to Zimmer re depositions .1; emails with DE re ex parte .1; emails with Trager re payment .2; email to Entrix .1; emails re LO call .1; review PWS expert filings .2; review Willis stmt .1; review depo notices and memo re same .3;	.6	
7/25: Review Fife filing .2; email re comments to same .5;	.7	
7/26: Emails with Fife re willis .3; review D40 depo objections .1; review CMC statements and D40 opp to trial cont .2; emails with Entrix on payment .1; email to Walker to take ex parte off .1; emails to and from Arndt re settlement .3;	1.1	
7/27: Prepare cmc statement .2; email to RZ re depositions .1; review motion by US .1; email to non parties .1; emails and call with West re Robie issues 1.2; review email from same and framework .2; review new Waldo contract .1; participate in PG call 1.4; email to LO counsel re PG .1;	3.5	
7/28: Emails with Bjorn .1; review 2 cmc statements .1; calls with DE and TB .3; review motion to strike .1; emails to and from LO re same .2; email to TB re Rosamond .1;	.9	
7/29: Email and call from DE re BBK getting fired and Dunn misrepresentations to court .1; hearing on many matters, memo to file re same 1.2; 30+ emails with LO counsel re strategy and handling settlement going forward 1.3; conf with DO .2; draft letter to BBK, and revise same 1.2; emails with Wellen re settlement .1;	4.1	
7/30: Emails with LO counsel re strategy .2; LO conf call and memo to file 1.1;	1.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>126.8</b>	

TOTAL PARALEGAL HOURS		
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# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: June 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
6/1: Conf call with Waldo and West re settlement .9; review of transcripts, prepare draft opp to transferee motion, conf with DO, revise same 3.6;	4.5	
6/2: Review motion for leave .1, email to DO; review opps of US and Willis .1; review and analysis of new class spreadsheet re inclusions and exclusions .7; emails to and from TB .1; emails with WW and SH .1;	1.1	
6/3: Review Dunn letter, email to Waldo .1; emails to LO re Robie .1;	.2	
6/4: Emails with client re Robie .1; call with BJ re mediation and memo to file .6; call and emails with client re strategy .3; emails with West and client .1; emails to and from D40 re Robie .3; call from West re handling Robie situation .7;	2.1	
6/7: Review agenda and email to client re handling .2; participate in Waldo conf call and memo re same .7; review draft letter and comments to same .4; review reply brief on transfer .1; email from DZ and revise Waldo letter .4; email to PG re same .1; email to LO re same .1; email to US re letter .2; many comments and emails on draft letter .2;	2.4	
6/8: Over 90 emails and 20 calls re PG letter and numerous changes to same 7.1; emails to and from DZ re transferee reply .3; review and post prin. group (PG) letter .1; review Dunn letter and call to Moore .1; email to PG re Robie letter, revise same .6; draft language re small pumper class for agreement tomorrow and email to Waldo .8; email to Moore re mediation .3; email to PG re letter .2; legal research and preparation of objection to PWS brief 1.2; emails with DO re strategy .3; emails from LO group re BBK misconduct .2	11.2	
6/9: Travel to and attend Waldo mediation, and later overliers meeting 9.2; emails with PG .2;	9.4	
6/10: Call from client and email to Waldo .5; update master mediation memo .4; travel to and attend Waldo mediation 5.9	6.3	
6/11: Receive and review new class database and analysis of same, class water use reporting data, and memo summarizing same 4.8; emails to SH re website and database .3; email to AH re class database analysis project .4;	5.4	
6/12: Check stats through website .2;	.2	
6/14: Prepare for hearing .4; attend hearing and memo to file .8; long call with Waldo on mediation issues 1.0; memo to file .1; review and analysis of new class database .3; email to SH re returns .1;	2.7	

6/14: Conf with MM re class database project .4; commence review and analysis of same for identification of non-class members, dupes, and others 6.6	0	7.0
6/15: Check database and email to SH .1;	.1	
6/15: Review and analysis of class DB for identification of non-class members, dupes, and others 7.6	0	7.6
6/16: Call from West re dormant law .3; email to West re Long Valley case .6; emails to and from West re Willis issues .3; email from DZ and email to DO re Willis .1; long email to Waldo re Mojave framework, subbasins and other management issues 1.4;	2.7	
6/16: Review and analysis of class DB for identification of non-class members, dupes, and others 7.1	0	7.1
6/17: Review Dunn letter and order, email to DO .1;	.1	
6/17: Review and analysis of class DB for identification of non-class members, dupes, and others 7.3; email to MM re status .2;	0	7.5
6/21: Review transfer order .1; email to EG and client re settlement .1; analysis and review of class database exclusion analysis and cf with other DBs and data sources 1.1; email to AH re further handling .2	1.5	
6/22: Review March 22 transcript .1; email from West and review agenda .1; long email from West for comments and review and markup memo for current settlement agreement 3.6; emails to and from West re same .8; call with same re draft agreement issues .7	5.3	
6/23: Travel to and attend Waldo mediation, and later overliers meeting 9.2; emails with PG .2;	9.4	
6/23: Review and analysis of class DB for identification of non-class members, dupes, and others 6.5	0	6.5
6/24: Travel to and attend Waldo mediation, and later overliers meeting 9.2; emails with PG .2; status email from AH re class member project .1;	9.5	
6/23: Complete review and analysis of class DB for identification of non-class members, dupes, and others 8.2	0	8.2
6/25: Calls and email from Entrix re payment .2; emails with DO re same .1;	.3	
6/28: Emails with AH re DB project status and questions .4;	.4	
6/29: Emails with West re settlement agreement .8; call with same .4; emails to LO counsel re PG mediation issues .9; review and analysis of class list exclusion analysis and correction to same .7; email to JD re same .2; emails to LO counsel and DE .1;	3.1	
6/30: Review nondeliverable list and email to SH .2; email from West and review and markup of accord document 1.9; emails to and from LO counsel re same .2;	2.3	
TOTAL ATTORNEY HOURS	80.2	
TOTAL PARALEGAL HOURS		43.90

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: May 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
5/3: Review litany of filings re CMO .2; call from Entrix re billing .1; email from West .1;	.4	
5/4: Emails with West and Lignon .2;	.2	
5/5: Prepare draft response to OSC, conf with DO and revise same 1.1; call from BJ and memo re same .6; email from West and review summary .1; call with West re mediation issues 1.1; memo re dame .2;	3.1	
5/5: Attention to entering class Q data into website 7.1	0	7.1
5/6: Telephonic hearing and memo to file re same .9; review MO re same and email to DO .1; phone call from Martin .4; call with West re litigation issues and CMO .5; email to Entrix re payment .1; email to LO counsel re transcripts .1; review 2007 and 2008 transcripts re inter se transfer issue .5; review agenda for meetings, email to client .1;	2.7	
5/6: Attention to entering class Q data into website 7.5	0	7.5
5/7: Research on lis pendens and inter se transfer issues, notice requirements, BFT issues, and constitutional questions, and memo re same 5.8; many emails to and from LO counsel re PWS depositions and strategy 1.2; emails to and from SK .1; call to MF .2; email to Waldo re water use and call to West re class dynamics and ballpark estimates .5; emails to and from RZ re strategy .1;	7.9	
5/7: Attention to entering class Q data into website 7.2	0	7.2
5/11: Email to Jim re water use .2; review West email and agenda .1;	.3	
5/12: Travel to and attend Waldo mediation and overlier group meeting 9.2; supplement mediation memo .3;	9.5	
5/13: Travel to and attend Waldo mediation 5.9	5.9	
5/14: supplement mediation memo .4;	.4	
5/17: Email to EG .1;	.1	
5/20: Email from EG .1	.1	

5/21: Email from West .1; emails with DO re settlement .2; email to EG re same .2;	.4	
5/24: Review West agenda and email .1; review latest settlement agreement .6; revise settlement agreement and email to client re same 2.2; call to client .3; further revisions and email to EG .3; call with client .2; emails to and from client .2;	3.9	
5/24: 5/5: Attention to entering class Q data into website 5.0	0	5.0
5/25: Long email to client re settlement 1.2; travel to and attend Waldo mediation 6.4; supplement mediation memo .4; call with client .3; review court order for May 6, email to DO .1; review client settlement markup .2; revise settlement agreement per client comments and email to same .8;	9.4	
5/26: Review D40 transferee motion and review prior pleadings and history re same .3; travel to and attend Waldo mediation 5.8; supplement mediation memo .3; emails to and from West .1; revise client settlement changes and emails and calls to same .6; prepare new draft version and email to EG .4;	7.5	
5/27: Review Van Dam and Grimmway oppositions to transferee motion .2; email to West re basin questions .6; call with client re settlement .2; email and call from West .1;	1.1	
<b>TOTAL ATTORNEY HOURS</b>	<b>52.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>26.8</b>



# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: April 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
4/1: Travel to and attend Waldo mediation 6.2; summary memo re same .4;	6.6	
4/2: Email from Fowler and call from same .8;	.8	
4/3: Compare dismissal filing against class database and doe filings .7; email to AH re further handling .2; email from DZ .1;	1.0	
4/4: Emails with DK re strategy .5; emails to and from Fowler .2;	.7	
4/5: Email from Fowler and review follow steps .1, review Qs for attorney and prepare draft response 2.5, and water master concept and prepare notes on prior history with that here and options from other basins 1.6;	4.2	
4/5: Review of dismissal and cross refer to prior analysis and class lists 6.4; conf with MM re same .2	0	6.6
4/9: Review draft agenda, email to Fowler .1; call to same re lawyer Qs and watermaster .8; return calls to three class members and update master memo re same .8	1.7	
4/12: Review MO re Van Dam .1; call with CM Pike re numerous issues .6	.7	
4/13: Call from Fowler re meetings and overlier meeting tomorrow night .8; review mediation memo .1;	.9	
4/14: Travel to and attend Waldo mediation 6.6; attend overlier meeting and summary memo re same 1.4;	8.0	
4/15: Travel to and attend Waldo mediation 6.3; summary memo re same .3; review US request .1;	6.7	
4/16: Email from DZ on breakdown and review expert report to check facts .4; email from Fowler .1; emails from DZ re in rem issues and review Tejon brief .3;	.8	
4/19: Review MO and email to DO .1;	.1	
4/20: Emails and call with class member Leon .5;	.5	
4/21: Email from Fowler and review 3 attachments .2;	.2	
4/22: Email from Waldo and review questionnaire, conf with DO re same .3;	.3	

<b>4/23: Email with client re water use form .1; long email to Waldo re same .9; email from Fowler re issues with LO troubles .1; call from Fowler re further detail on same and background .7;</b>	<b>1.8</b>	
<b>4/26: Email from client, analysis re numbers, and call to same re mediation directions .6; review email from Waldo and agenda .1; commence supp brief re allocation and DQ, review transcripts 2.1</b>	<b>2.8</b>	
<b>4/26: Review of dismissal and cross refer to prior analysis and class lists 5.2;</b>	<b>0</b>	<b>5.2</b>
<b>4/27: Review email from West and two technical working group reports .4; call to West re same .5; email from Fowler and review settlement draft, prepare comments to same .8; conf with DO re brief and revise and finalize same .6;</b>	<b>2.3</b>	
<b>4/28: Travel to and attend mediation sessions 6.7; memo re same .4;</b>	<b>7.1</b>	
<b>4/29: Travel to and attend mediation sessions 5.7; memo re same .3; call with BJ .6; email from Fowler re lit issues .1;</b>	<b>6.7</b>	
<b>4/30: Review filings re CMO issues .2; email from West and review and markup settlement doc .7; review Grimway and Tejon CMO filings .1;</b>	<b>1.0</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>54.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>11.8</b>

# Law Office of Michael D. McLachlan, APC

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

# INVOICE

DATE: March 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
3/1: Emails with SH .1; review Waldo documents .1	.2	
3/2: Prepare supp brief on expert allocation motion, revise same, review documents 1.2; prepare cmc statement .5; email to and from TT .1; review ex parte .1;	1.9	
3/3: Travel to and attend Waldo mediation 6.4; emails from counsel re trial setting .1;	6.5	
3/4: Attention to filing expert corr .1; email to client re status .2; 21 emails to and from counsel re trial setting 1.2; review 11 cmc statements .7	2.0	
3/5: Review CMC statements prepare for hearing 1.1; review Fife reply and research re 170.6 issues .8; review objection by Fife .1; review KL withdrawal papers and conf with DO .2; call to client .2;	2.4	
3/8: Travel to and attend hearing, memo to file 3.7; conf with DO re next steps and writ .3	4.0	
3/10: Review MO and email to Walker re error .1;	.1	
3/11: Email from EG re settlement .1; conf with DO re handling .2; call from BJ .4; email to and from reporter on hearing transcript .2; emails re settlement .1;	1.0	
3/12: Calls with BS and DE and emails to same re Waldo .4; legal research for writ petition 4.8	5.2	
3/13: Review final transcript .2; further research on writ 2.7	2.9	
3/14: Long email to Fowler re settlement issue .7; out of state research to support writ 5.7	6.4	
3/15: Call with Fowler and further emails 1.2; emails to and from client re settlement .2; call to same .4; review settlement agenda and draft agreement .2; numerous emails with PM parties re same .3; review PWS proposed cmo .1; emails with client re settlement .4; review 4 other cmc statement .2;	3.0	
3/16: Calls with Waldo and client re settlement history and planning 1.3; email to Fowler re CA rules on confidentiality .5;	1.8	

3/17: Research on JC website re writ .5; travel to and attend settlement meeting 6.3; email to LO counsel .1;	6.9	
3/18: Prepare cmc statement, conf with DO re same, and revise 2.7; call from Fowler re settlement issues .8;	3.5	
3/19: Review Fife writ .3; further call with Fowler re settlement .5; review draft of writ .9; email from Fowler and review attached documents .3; review order on writ and email to DO .1; review 7 cmc statements .3; review Dunn decl .1;	2.5	
3/21: Email to DO re due process issue .2; research for applicable citations 1.3;	1.5	
3/22: Telephonic hearing and memo to file re same 1.2; call with Joyce re strategy issues .5; email from client .1; call with class member re issue with membership and lawsuit questions .5; long memo from joyce and review water supply assessment summary and records .5; research online regarding same 1.2; legal research regarding applicable law for issuance of will serves and water supply assessments 3.6; emails to LO counsel re 2009 transcripts missing, and review same, email to DO .5; emails to and from client .1; review of writ draft and markup of same .6;	8.8	
3/23: Emails with Fife .1; attention to Entrix billing and emails with PWS counsel .1; review of writ petition .6; emails to and from LO counsel re joint defense issues .4; emails with client re settlement .2;	.8	
3/24: Call from process server re writ issue .1; review waldo email and documents .2;	.3	
3/25: Prepare proposed order .4; review MO re DQ email to DO .1; review transcript and email to TB re expert bills .2; emails to PWS counsel and DO re Entrix bills .4; emals to and from WW and KL re expert bills .2;	1.3	
3/26: Review Joyce email and analysis re Ritter Ranch .3; review of preliminary opp and email to DO .2; email to RK re willis forms .1;	.6	
3/27: Email with DO .1;	.1	
3/28: Emails with client re settlement .2;	.2	
3/29: Strategy emails with RK .1; email from Fowler and review settlement docs .3; attention to handling of writ exhibits .4; call with Fowler re settlement issues 1.4	2.2	
3/31: Travel to and attend Waldo mediation 6.5; memo to file re same .6	7.1	
<b>TOTAL ATTORNEY HOURS</b>	<b>73.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: February 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
2/1: Review filings on consol .3; call with RK .4; prepare brief on consolidation .7;	1.4	
2/2: Research for consolidation filing .4; review settlement drafts .7; emails to and from client and email to Randy W on global comments .5; prepare revised settlement agreement .4; email to PWS counsel re same .3; review all briefs on consolidation .5;	2.8	
2/3: Complete consolidation brief .5; attend principals meeting in Lancaster 4.8; 8 emails with WS re settlement issues .5;	5.8	
2.4: Email to WS re settlement .1;	.1	
2/5: Hearing on consolidation and memo to file re same .6; emails with EG re settlement .3;	.9	
2/9: Review and analysis of Gene docs .3;	.3	
2/15: Email to EG .1; review mediator documents .1; email to client re PM .1;	.3	
2/16: Email from EG and client .1;	.1	
2/18: Email from Blum and review case .3; emails to and from client re Waldo .2; emails with RZ .1; email to Waldo .1;	.7	
2.19: Review consol order .2; review minute order .1;	.3	
2/22: Call with DOL re consol order .2; review latest EG draft agreement .2; emails with LO counsel re consol and settlement .2	.6	
2/24: call with client .5; call with DOL .2; letter to Thompson .4; call from same .3; review Thompson proposal and emails to and from DOL .2;	1.0	
2/25: Emails with PM .1; emails with DO re expert issues .4;	.5	
2/26: Review 170.6 filings .2;	.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>15</b>	

# Law Office of Michael D. McLachlan, APC

# INVOICE

523 W. Sixth Street, Suite 215  
Los Angeles, CA 90014  
Phone 213-630-2884 Fax 213-630-2886

DATE: January 2010

**Bill To:**  
Antelope Valley Purveyors

**For:**  
Legal services, Wood Class Action

DESCRIPTION	HOURS	PARALEGAL
1/2: Review and analysis of settlement draft and commence modifications of same 1.6;	1.6	
1/3: Call to client .1; continue drafting of revisions to settlement agreement 2.3; emails to and from client re same .2;	2.6	
1/4: Review emails to and from client, further modifications to agreement .2; emails to and from class members .3; review Paxton emails, watermaster memo, and negotiating docs .6;	1.1	
1/5: Call with client on settlement issues .9; conf with DOL .1; continue revisions to agreement and transmit to client .8; calls to and from class members .5; research on several class member issues .5; emails to and from SH re same .3; emails to Gambone .1;	3.2	
1/6: Email from client and further revisions .6; email to EG re changes to agreement .3; review Paxton email and further settlement docs .4; email to Paxton .1; email to Wonnell re dismissal .1;	1.5	
1/8: Prepare CMC statement .6; emails with Bunn re settlement .1;	.7	
1/9: Emails and call with client .3;	.3	
1/10: Emails with client .1; review CMC statements and letters, proposed order .5;	.6	
1/12: Call from Hedlund .2; review of numerous class member status documents and database info .5; email to Hedlund .1; review various CMC filings .2; review and analysis of proposed order .5; email to RK .1; conf with DOL re same .1; prepare and revise email to PWS .2; call from Weeks .4; calls from 2 class members .3	2.6	
1/13: Review Mettler Valley list .2; emails with SH .1; emails with counsel re conf call .1; emails with SO .3 and LO counsel re consol .3;	1.0	
1/14: Call for meet and confer on consol order .3;	.3	
1/15: Calls and emails with PWS counsel .4; call to and from LL .1; cmc hearing and memo to file .5; emails with EG .1; call from LL .1;	1.1	
1/18: Review Paxton email and five PM files, complete settlement doc .3;	.3	

1/20: Call with Dunn on settlement and consol issues .8; call with DOJ re same .7;	1.5	
1/21: Calls to and from RK .4; conf with DOL re handling settlement .3; emails with client re mediation .2; emails with DE re PM .1;	1.0	
1/22: CMC conference and memo to file re same .7; emails with Dunn .1; emails with counsel re mediators .3; email to all re Waldo .3;	1.4	
1/25: Emails with Dunn and conf call re settlement with same, memo to file .6; review proposed order .1;	.7	
1/26: Emails to LO counsel re our settlement .2;	.2	
1/29: Review RAW comments on global settlement and emails to group and client .3; review EG settlement redraft .2; review willis order .1; review and analysis of PM documents .3; email to group on authority of RAW .2;	1.1	
1/29: Compare recent Doe filings against class list 5.1	0	5.1
1/31: Review AV filings on consol .2; research on judgment issue .4; email to Goldsmith .1;	.7	
TOTAL ATTORNEY HOURS	23.5	
TOTAL PARALEGAL HOURS		5.1

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: December 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
12/2: Participate in AVEK meeting, memo to file 2.5; read willis statement .1	2.5	
12/5: Phone call with Weeks re settlement issues .4; call with client .2; emails to and from RK .3;	.9	
12/6: Emails to and from RK .1; review current allocation matrix and brief .3; review and markup of consensus document .6; email to all re settlement .2; prepare letter to Robie .5; review Copa terms .2; research on amended judgment appealability .8; email to and from DZ re same .4;	3.1	
12/8: Emails re settlement .2; review water right claims .2; review record designation on appeal .2	.6	
12/9: Prepare status conf stmt .4;	.4	
12/13: Travel to and attend CMC, memo re same	2.8	
12/19: Emails to and from DZ re fee issues .3;	.3	
12/21: Call with RZ .3;	.3	
12/27: Review appellate docket and consol order, email to BBK .2;	.2	
12/29: Emails with DZ re appeal dismissal and handling fees .3; conf with DO re same .1; call with RZ re settlement .5;	.9	
TOTAL ATTORNEY HOURS	12	
TOTAL PARALEGAL HOURS		



# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: November 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/1: Call from class member .2; call with Leever .5; emails to and from D counsel .1;	.8	
11/4: Review BB memo and call to same .1;	.1	
11/7: Email to and from EG .1; review settlement corr .1; review RK opp .2;	.4	
11/8: Review 10/12 transcript and email to DO re same .2;	.2	
11/10: Review emails re settlement .2; review CMC statements .3; review BW discovery .2; prepare CMC statement and declaration of MDM, conf with DO re same, revise and file 2.8	3.5	
11/14: Prepare for status conf., including review of various statements and prior transcripts .4;	.4	
11/15: Travel to and attend status conference at CCW 3.3; review proposed order and corrected proposed order .1	3.4	
11/16: Review OSC .1;	.1	
11/17: Review order and conf with DOL .1; prepare for and attend conf call with MD and John U .6; review and analysis of summary expert report and tech comm. reports on water use issues .5; email to MD and JU .1; review settlement language and voluminous comments .5; email to Brunick .1; email to BW re extension .1; review BB memo, email to client .1; email to BB .2;	2.3	
11/18: Emails to and from DO re motion strategy .5; travel to and attend settlement meeting 4.4	4.9	
11/19: Long strategy memo to DO .8	.8	
11/22: Emails to and from BS .1; review BW draft letter .1;	.2	
11/28: Review notice of appeal and many emails with RK and DZ .4;	.4	
11/29: Emails with client re settlement .2;	.2	
TOTAL ATTORNEY HOURS	17.7	
TOTAL PARALEGAL HOURS		

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: October 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/3: Emails to and from client re settlement .5;	.5	
10/5: Review settlement correspondence .1; prepare CMC statement, DO conf. and revise same .5; email from SH re data and email to DO .1;	.7	
10/6: Draft letter to Garner, conf with DO re same, and revise 1.3;	1.3	
10/7: Review CMC statements .2;	.2	
10/11: Review CMC statements .1	.1	
10/12: Analysis re handling water use proof issue .6; meeting with O'Leary on proposed filing and strategy .4; emails with client on settlement meetings .1; call with client re CMC and settlement .7	1.8	
10/13: Call with client .4;	.4	
10/21: Review BB draft phy solution and markup of same .4;	.4	
10/26: Review email and data from SH .1; email to client re same .1;	.2	
10/27: Emails to and from SH .2; emails with client re data and settlement .3; review settlement document from RZ and emails from counsel .3	.8	
10/28: Attend AVEK meeting and memo to file re same 4.7	4.7	
TOTAL ATTORNEY HOURS	11.1	
TOTAL PARALEGAL HOURS		

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: September 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/2: Emails to and from Bunn .1; review and analysis of last settlement allocation, mediation submissions, review prior discovery responses and summary memos and create updated version of more likely water use for big players 5.6	5.7	
9/5: Research on calculation of landscape water use, and rural residential use in desert climates, review various studies of same and prepare memo 6.4;	6.4	
9/6: Call with client on allocation issues .3; emails to and from same .5; review and analysis of AB 1881 and potential regs .4; continue research on and rural residential use studies 3.7; review summary expert report for baseline data and calculations of potential water use, create spreadsheet for same on range of known class uses 1.7; email to client re water use and settlement .4;	7.0	
9/7: Emails to and from WW, client, and other PWS re water use data .3; research on line for available data on residential use from water suppliers in desert areas .9; review fee order .1; review Joe S 2010 depo and pull relevant text from summary report, email to DO re water use opinions .5; email to PWS 1;	1.9	
9/7: Travel to UCLA to get articles and studies on water use for MM		3.8
9/10: Call with client re settlement issues .4;	.4	
9/12: Further research on class water use, including review of expert data and phase 3 reports and analysis of same 3.7;	3.7	
9/13: Emails to and from client on settlement issues .1; further review and analysis of party submissions to Robie from Bunn .5; long email to DO re water use .7; email to and from client and DO re same .5; emails with JUK .1;	1.9	
9/14: Further research on ag studies of landscaping requirements, review prior trial exhibits, summary memo re same 5.2	5.2	
9/15: Emails with client on water use .3; emails to and from Bunn re PWD data .2; research on state laws relating to domestic use .5; email to client re legal issues and impact of 106 .8;	1.8	
9/16: Prepare summary of settlement terms .7; email to client re same .5;	1.2	

<b>9/19: Emails to and from client re domestic use and legal issue re settlement .9;</b>	<b>.9</b>	
<b>9/21: Review and analysis of Mojave basis studies .7; emails to and from WW re Joe S data .1; review amended Willis judgment .1;</b>	<b>.9</b>	
<b>9/22: Telephonic hearing and memo re same .4;</b>	<b>.4</b>	
<b>9/23: Review Dunn letter, email to client re Robie .1;</b>	<b>.1</b>	
<b>9/26: Call with client .6; review CMC statement .1; email to Justice Robie re data issues .2; emails to and from client re Mojave study .3; review order and emails with RK .3; review AV press article .1; call from client .2;</b>	<b>1.8</b>	
<b>9/27: Emails to and from Robie and Dan .1;</b>	<b>.1</b>	
<b>9/28: Revise settlement terms summary and email to client .5; emails with client re same .2;</b>	<b>.7</b>	
<b>9/29: call with SH re LS docs and meeting, email to DO .2; email to SH re same .1</b>	<b>.3</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>40.4</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>3.8</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: August 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
8/3: Emails and calls with client on numerous settlement issues 1.3; calls to and from BS and MF .2; legal research on domestic use and prescription issues in case law, statutes and regulations 3.8; conf. with DOL on Robie sessions .1; emails to and from M Moore .1; email to client and Davis .1;	5.6	
8/4: Conf call with client and DOL re: settlement issues .5; emails to Bunn and BBK .1; conf call with Davis, JUK., re settlement issues .7; call with client .3; call to M Moore .1;	1.7	
8/5: Review writ and supporting papers .5; review and analysis re settlement materials from client .7; prepare settlement brief for Robie 1.8; emails to client and DO re same .1; conf with DO and finalize brief .4; email to Robie .1;	3.6	
8/6: Emails to and from DZ re settlement and writ .3;	.3	
8/9: Emails to and from RWalker .1;	.1	
8/10: Emails to and from DE re Rosamond service are changes and attention to verifying class membership issues 1.2; email to DE re findings .1;	1.3	
8/11: Review MO re Robie and hearing, email to DO .1; review RZ CMC .1;	.2	
8/16: Review 7/11 transcript .2;	.2	
8/23: Emails to and from client on settlement .3; prepare reply brief on expert motion, conf with DO re same, revise and file 2.9;	3.2	
8/24: Review US and Willis CMCs .1; long call with client .5; emails with RK .1;	.7	
8/26: Review five cmc statements .2; email to Moore re mediation .2;	.4	
8/29: Prepare for hearing, review transcripts .7;	.7	
8/29: Prepare hearing binder for motion, index transcripts .8	0	.8
8/30: Travel to and attend hearing on expert motion and status conf 2.3; memo to file re same .1; conf with DO .2;	2.6	

<b>8/31: Travel to, prepare for and attend Robie mediation 9.7; meeting with DOL re strategy .7;</b>	<b>10.4</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>31</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>.8</b>

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: July 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/5: Review and analysis of EG settlement markup, and further changes to same .9; emails with BBK .2; review SoD reply .1; review and analysis of Phase 3 transcripts on 5 points, and prepare summary memo re same 5.7	6.8	
7/6: Review Joe S trial testimony for 3 points and prepare summary memo of same 2.4	2.4	
7/7: Calls and emails to and from Dunn .1	.1	
7/8: Call with Dunn and WW .5; talk with DOL .1; calls to landowner counsel .1;	.7	
7/11: travel to and attend hearing and cmc, memo to file re same 2.5; commence motion authorizing expert work 2.8	5.3	
7/12: Review and summarize prior hearing transcripts re expert motions and review relevant filings and order, memo re same 2.1; complete motion authorizing expert work, conf with DO re same, and revise and file 4.2; long email to RK re common issues and settlement .6; emails to and from DZ re appeal .3; email to DO re settlement strategy and issues on expert .5;	7.4	
7/13: Assessment of revised settlement changes and two long emails to EG re same .9; review and analysis or RK supplemental application.2; legal research re procedure for same .8; review of SoD and check hearing notes re return flows .3; emails to LO counsel re same .1;	2.3	
7/14: Review and analysis of settlement and emails to and from BBK re same .5; review MO and email to RWalker re error .1; review agreement and prepare revised version, seven emails with PWS re same .7; conf with DO re settlement issues .3; emails and from DE re settlement .3; call to client re same .3;	2.2	
7/15: Emails to LO counsel re watermaster .2; emails to and from client re Robie and settlement .3;	.5	
7/18: Review Orr letter .1; emails to and from class member Williams .4; review Bunn comments .1;	.6	
7/19: Emails to and from client and call to same re settlement issues .4; 9 emails to and from PWS re settlement issues .7	1.1	

<b>7/20: Emails with client re watermaster issues .2; long email to DO and client re settlement .4; call to BS .1; emails with KL re settlement .2; call with MF re watermaster .2; emails to and from Bunn .2; email to KL re settlement .2; email to and from CM Williams re lawsuit .3;</b>	<b>1.8</b>	
<b>7/21: Return call from three CMs, and update master memo re same .9; emails with client .1;</b>	<b>1.0</b>	
<b>7/25: Conf with DO re handling settlement, global and otherwise .6; draft letter to Robie and email to DO re same .8; emails to DO and client re same .2;</b>	<b>1.6</b>	
<b>7/26: Further revisions to agreement and email to Bunn re same .7; emails and call with client re settlement .3;</b>	<b>1.0</b>	
<b>7/27: Review MO re Robie, emails with JM and TB .1</b>	<b>.1</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>34.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		



# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: June 2011

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
6/6: Review and markup proposed SoD .4;	.4	
6/8: Research on settlement standing issues 1.2; revise reply brief 1.1; email to SH .1;	2.4	
6/9: Call with client .3; preparation of Wood declaration .8; emails to and from DO and client re reply papers .2; prepare MM decl .5; attention to revision of reply documents and numerous email to BBK re same 1.3	3.1	
6/14: Review proposed add on order and email to JD .1; emails with SH .1; prepare preliminary approval order .8; email to RWalker .1;	1.1	
6/15: Prepare for class approval hearing 2.7	2.7	
6/16: Travel to and attend hearing for settlement approval, and meeting with JD and WW afterward, memo to file re same 4.6;	4.6	
6/20: Prepare revised settlement agreement 1.4; email to Dunn .1;	1.5	
6/21: Review SoD and objections to same .7; prepare joinder .1; emails to LO counsel re objections .2	1.0	
6/22: Emails to RWalker .1; emails to JD. 1; emails to RK re appeal issues .2;	.4	
6/23: Review client comments to agreement .2;	.2	
6/24: Emails to DO and client re settlement .2; email to WW .1; LO call .5;	.8	
6/25: Long email to LO counsel re prescription .5; emails to and from LO counsel re Robie .4; emails with client re settlement .2;	1.1	
6/27: Letter to Robie 1.0;	1.0	
6/28: Emails with RWalker .1; call with class member Hulick .4	.5	
<b>TOTAL ATTORNEY HOURS</b>	<b>20.8</b>	
<b>TOTAL PARALEGAL HOURS</b>		



# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: May 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
5/1: Prepare class notice 1.2; prepare summary notice .2; prepare email re timeline .2; emails re approval to BBK .2;	1.8	
5/2: Review EG decl .2; attention to preparation of all settlement approval paperwork, motion, exhibits, order, declarations, and revisions to same, including over 70 emails and calls with D counsel 10.4	10.6	
5/3: Prepare notice of lodging .2;	.2	
5/6: Review tentative and RK fee order .3;	.3	
5/10: Emails with client re settlement .2;	.2	
5/13: Review oppositions to settlement .6; emails to and from RK and DZ re fees .2;	.8	
5/16: Commence drafting reply brief for settlement approval 2.4;	2.4	
5/17: Emails with WW .1; review BBK reply and markup same and 13 emails re same 1.7;	1.8	
5/19: Review MO re SoD .1;	.1	
5/23: Review RZ opp .1; review AGWA filing .1;	.2	
5/27: Emails to and from RWalker re hearing .1;	.1	
5/31: Review and summary of reply points .5; long email to SH re handling reply .7;	1.2	
TOTAL ATTORNEY HOURS	19.7	
TOTAL PARALEGAL HOURS		

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: April 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
4/5: Email with PM group .1; emails to and from WW re settlement .1.0; 15 other settlement emails .4;	1.5	
4/8: Emails with D counsel re settlement .2; emails with LO counsel re closing .5; review Dunn markup of judgment and email to same .1;	.8	
4/11: Work on judgment .3; email re same .2; review Bachman decl .2; prepare closing argument 2.7	3.4	
4/13: Travel to and attend trial 6.1	6.1	
4/15: Review Wellen letter and emails to and from Gene .4	.4	
4/19: Emails to and from client .2;	.2	
4/20: Emails from Dunn on judgment .1; emails with DO re handling .3; research on board approval of settlement .3;	.7	
4/21: Further changes to judgment .2; many emails with D counsel re same and settlement .6	.8	
4/23: Emails and call with client .3; email to Wes re settlement .2; emails with RWalker .1;	.6	
4/25: Emails to and from SH re meet and confer .4; emails to and from RK re settlement issues .3; email to Dunn re settlement .2; prepare letter to Judge re meet and confer .6; email to DO re same .1; revise letter .1; email to Bunn re same .1; emails to and from RWalker re letter .1;	1.9	
4/26: Conf call on proposed judgment .9; emails to and from client and DO re settlement .3; emails to and from D40 re settlement .2; revise judgment and emails re same .5; email to RWalker .1; 12+ more emails on settlement execution .4;	2.4	
4/27: 11 emails re settlement .4; email to client re settlement .2;	.6	
4/28: Call from Wellen and Garner .2; call with client .3; review Hedlund drafts .2;	.7	
4/29: Emails to and from WW re approval motion .4; call with client .2; email to and from RWalker re hearing .2;	.8	

<b>4/30: Lone email to D counsel re approval .4; email to DO and client re settlement .3;</b>	<b>.7</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>21.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: March 2011

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
3/1: Emails from D counsel re settlement .1;	.1	
3/2: Emails re trial transcripts .1;	.1	
3/3: Emails with client re settlement .2; 17 emails to and from D counsel re same, and further modify settlement .7	.9	
3/4: Review PWS response re Joe .2; email to DZ re fee material .3; email from D counsel re settlement .3;	.8	
3.5: Further changes to agreement and emails re same .2	.2	
3/7: Review fee bill opps .2; modify settlement and email to counsel re same .3;	.3	
3/8: Further changes to agreement and emails re same .2; email to WW re fees .1; emails to and from 3 class members re questions .6	.9	
3/9: Email to Markman re settlement .2; brief review of opps and email to RK re same .3; emails to and from DO re trial and settlement .5; call to client re same .3;	1.3	
3/10: Email to DZ on reply .2; emails to and from CM Lytle re lawsuit and issues with well .6; emails with RK re fees .2; emails to and from LO counsel re trial .2; email to D counsel re fees .1;	1.3	
3/11: Review numerous oppositions re fees motion .8; call from Hansen re transcripts .1;	.9	
3/13: Emails with Miliband re settlement .1;	.1	
3/14: Travel to and attend trial 9.3; prepare summary re same .6; emails with LO counsel re trial .3; research and commence drafting of reply brief re Willis fees motion 1.4;	11.6	
3/15: Travel to and attend trial 9.5; prepare summary re same .5; complete draft of Willis reply on fee motion 1.2; email to KL re settlement .1; email to WW re same .1	11.4	
3/16: Travel to and attend trial 9.6; ; prepare summary re same .8; emails to D counsel re settlement .2; email to LO re offer of proof authority .4; emails with LO counsel re trial issues 3;	11.3	

3/17: Travel to and attend trial 6.1; emails with D counsel re settlement .3; emails to LO counsel re trial .2;	6.6	
3/18: Call with DE .1; emails with D counsel re settlement .3; emails to LO counsel re trial .5;	.9	
3/21: Review recent briefs on fee motion 1.2; email to DE re judgment .1;	1.3	
3/22: Travel to and attend trial 9.2; prepare summary re same .4 prepare judgment 1.1	10.7	
3/23: Travel to and attend trial 9.3; ; prepare summary re same .3	9.6	
3/24: Email to JT re settlement; travel to and attend trial, summary re same 8.0;	8.0	
3/25: Travel to and attend trial, summary re testimony 8.4;	8.4	
3/28: Travel to and attend trial, summary re testimony 8.1;	8.1	
3/29: Travel to and attend trial, summary re same 3.4; emails to and from DE and modifications to judgment .7; email to DO re trial .2; analysis and review of BB settlement framework .4;	4.7	
3/30: 12 emails to and from D counsel re judgment .4; emails to and from LO re closing .2;	.6	
3/31: WW email and memo from BB, email to DO re global settlement .3;	.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>100.4</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: February 2011

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
2/1: Travel to and attend trial, meeting with counsel 10.2; emails to WW re settlement .1	10.3	
2/2: Travel to and attend trial, preparation of X for Durbin, review and summary of depo 18.9; email to R Walker .1; emails with RK re settlement .4; email to LO counsel re schedule .2;	9.6	
2/3: Travel to and attend trial, ex parte app, continue Durbin prep 7.4; long call with CM Pike re lawsuit and property issues .5; emails to and from West re settlement .8; emails with MF re trial .1;	8.8	
2/4: review Beebe depo and commence prep of outline for same 4.6;	4.6	
2/5: Summarize Durbin depo vol 2 5.1;	5.1	
2/8: Emails to SH re trial status .1; finish Durbin cross 1.3;	1.4	
2/9: Review and supplement Wildermuth outline and review of exhibits 1.8	1.8	
2/11: Emails from LO counsel re trial .1;	.1	
2/13: Legal research and preparation of objection to Joe S exhibits 1.8; email to LO counsel re same .1;	1.9	
2/14: Travel to and attend trial 9.3; review and summary of PWS discovery responses .6; review D40 response to Willis disco and email to RK .1	10.0	
2/15: Travel to and attend trial 9.6; emails to and from RK re legal issues on fees .5;	10.1	
2/16: Research on scholarly articles regarding desert recharge 1.6; emails to MF re same .1; travel to and attend trial 9.8;	11.5	
2/17: Travel to and attend trial 7.3; emails to and from WW re settlement .2; email to DO re Durbin .4;	7.9	
2/18: Call from G Wheeler re lawsuit .4	.4	
2/19: Emails with WW .1;	.1	
2/20: Emails to LO counsel re trial .2;	.2	



<b>2/22: Review RK ex parte papers .4; emails to and from WW re fees, analysis re same .3; review Bunn comments to settlement .1;</b>	<b>.8</b>	
<b>2/23: Prepare for hearing 2.4; emails to and from DZ re hearing issue .2; revise settlement agreement and circulate same .9; further modification to same and circulate .2; call from TB .1; revise agreement and email to all counsel .3; emails with JU .1;</b>	<b>4.2</b>	
<b>2/24: Travel to and attend hearing on Wills settlement, expert motion etc., memo to file 4.6; email to Dunn re missing parties .1; emails to LO re same .1; email to Reinhard re water use .1; emails to and from DE .1;</b>	<b>5.0</b>	
<b>2/25: Emails with DE re settlement .3; emails to and from DZ re fees .2;</b>	<b>.5</b>	
<b>2/28: Emails from D counsel re settlement .1;</b>	<b>.1</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>94.4</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: January 2011

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
1/2: Email to LO counsel re Joe S .1; review and analysis of expert report, depo exhibits and prepare X for Wildermuth 4.6	.1	
1/3: Emails with Strager re settlement .5; emails with Brewer and SH re error re same .3; review Joe motion .2; emails re LO counsel re same .3	1.3	
1/4: Review Joe S order .1; travel to and attend trial, planning meeting with counsel 9.2; emails to and from CM Jones .1;	9.4	
1/5: Emails to LO counsel re trial issues .3; travel to and attend trial 8.6;	8.9	
1/5: Attention to assembly of trial exhibits and trial docs in binders, instructions to copy service re copying 6.9	0	6.9
1/6: Travel to and attend trial, attention to prep 8.9; work on settlement agreement .5; email to D counsel re same .2;	9.6	
1/7: Emails re settlement .2; emails re depositions .1; review letters .1;	.3	
1/8: Summarize Joe S. depo vol 1 5.7; emails re exhibit numbering .1;	5.8	
1/9: Summarize Joe s. depo vol 2 5.1;	5.1	
1/10: Attend Joe S deposition 3, summary memo re same 3.3;	3.3	
1/11: Attend Joe S deposition 3, summary memo re same 3.9; email to JU .2; review and analysis of Joe S exhibits and prepare summary of same 2.4; emails to and from WW and BBK re settlement .2; emails to and from counsel re Joe S issues .3; review RK discovery and email to same .2; excerpt Joe S prior testimony and email to JU .5;	8.0	
1/12: Emails with David group re rural residential issues .5; attend Joe S deposition 3, summary memo re same 4.1; emails to D counsel re cumulative testimony motion .4; review new Joe S exhibits and supp summary of same .5; long call with CM Anderson .6; analysis re same and email to SH .2;	6.3	
1/13: Emails re settlement .1; attend Joe S deposition 4, summary memo re same 4.0; emails to S Reed re proposal .2; emails with LO counsel re planning for Joe cross .3;	4.6	

1/14: Emails with LO counsel and analysis of Fife outline for Joe S .4; conf call with LO counsel re cross of Joe, memo to file .9;	1.3	
1/15: Emails with JU .1; review records and testimony and analysis of base period issue 1.1; review of expert report on same .3;	1.5	
1/16: Prepare exam outline for Joe S and exhibits for same 3.8;	3.8	
1/17: Emails to SH re exhibits .1; attend Joe S deposition 4, summary memo re same 4.0; 15+ emails with LO counsel re Joe S cross .7;	4.8	
1/18: 20+ emails to and from LO counsel re Joe S issues and cross .9;	.9	
1/19: Emails to and from class members .3; emails with LO counsel re Joe S cross .6;	.9	
1/20: Travel to and attend Joe S depo 10.4; emails to DO and MF re same .3;	10.7	
1.22: Emails to and from RK .1;	.1	
1/23: Emails with LO counsel re planning for trial, review Fife calendar .2; emails with RK .1;	.3	
1/24: Commence preparation for Oberdorfer, review and summarize depo 3.4; review Fife analysis .3; LO call and memo to file .7;	4.4	
1/25: Travel to and attend Joe S depo 10.7;	10.7	
1/25: Attention to organization trial exhibits, depositions for trial 5.8	0	5.8
1/26: Long email to LO counsel re Joe .5; attend Joe S deposition, summary memo re same 5.0;	5.5	
1/28: Review RK settlement .4; review final approval hearing papers .9; review Fife water board filings .2;	1.5	
1/29: Review Fife Wildermuth notes .2; review and summary of Wildermuth depo and exhibits 4.5	4.7	
1/30: Continue prep for Wildermuth, prepare cross outline 2.7	2.7	
1/31: Travel to and attend trial 9.2;	9.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>125.7</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>12.7</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: December 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
12/3: Email to RWalker re order .1;	.1	
12/5: Review proposed CMO and markup of same .3; review expert demands .1;	.4	
12/7: Review CMC statements .2; emails with DO and client .3; email to Veritext re phase 4 .2;	.7	
12/10: Review D40 and US filings .2; emails with DO re hearing .2; emails with RK re appeal .3;	.7	
12/11: Review expert order .1;	.1	
12/13: Email to TT re status .2;	.2	
12/14: Conf call with all parties from Phase 4 issues 1.0; conf with DOL re same .2; prepare draft ex parte re phase 4 and email to Rwalker .5; conf call with liason comm re: phase 4 issues .8; email to RW re new class complaint filing .1; revise ex parte application and circulate same by email .7; emails to and from SReed re phase 4 proposals and options .5; email with Morris re same .1; prepare notice of intent and file same .1; review numerous notice filings .2; review Bezerra proposal and emails to and from same .3; call with counsel re CMO and trial issues .4;	3.9	
12/15: Emails to and from Fife and Bezerra re CMO .2;	.2	
12/17: ; Email to and from Walker re ex parte date .1; Prepare and revise amended CMO 1.0; approximately 20 emails to and from counsel re comments on CMO and ex parte and revision same 1.3; legal research on WC alt. water supplies .4; revise ex parte application .8; numerous emails to and from R. Walker .2; call with Milliband and memo re same .6; call with Kuhs and email to DOL re settlement .8; emails with RB .reCMO .1; call from School district re class and trial issues .4; edit and file ex parte and amended CMO .6; calls from two class members .5;	6.8	
12/18: Review recent notice filings and prepare summary list .3; research and analysis re public records issues .6; review and analysis of WM ex parte .2; emails with Orr and review LC filing .1;	1.2	
12/19: Call from Lewis re Warnock joining class .4; memo to file re same .1; review oppositions to ex parte .2;	.7	

<b>12/20: Prepare for hearing .2; participate in ex parte hearing, memo to file .5; emails with Reed re pricing issues .1;</b>	<b>.8</b>	
<b>12/21: Call from School district lawyer re joining class .4; review Veritext pricing proposals for phase 4 .3; review further notice filings and supplement phase 4 list re same .3; long email to LC re same .4; review and analysis of PWD discovery filing .3; emails to and from LC .1; review and analysis of class databases and email to Thompson (TT) re same .6; analysis re construction of survey and research on statistics and calls to two experts re questions 1.1;</b>	<b>3.5</b>	
<b>12/21: Commence printing, organization and binding of phase 4 discovery documents 4.0; conf with MM re handling same .2;</b>	<b>0</b>	<b>4.2</b>
<b>12/22: Commence review, analysis and summary of voluminous discovery filings with WW40, Copa, Wagas, Palmdale and Lancaster, including summary memo 4.6</b>	<b>4.6</b>	
<b>12/23: Continue review of voluminous discovery responses and continue with Rosamond, COLA, Boron, Phelan, Grimmway, Adams, State, Landinv, Granite and further D40 7.1;</b>	<b>7.1</b>	
<b>12/27: Continue printing, organization and binding of phase 4 discovery documents 4.8</b>	<b>0</b>	<b>4.8</b>
<b>12/27: Emails to and from LC .2; continue review of voluminous discovery responses and continue with solar, SCE, Big Rock, Grimway, Lemieux clients 6.6</b>	<b>6.8</b>	
<b>12/28: Liason committee meeting and memo to DOL re same 1.2; analysis re class stipulation issues for upcoming trial, and commence draft of same .8; emails to and from TT re survey .2; emails to and from TB and TT re data .2; continue review of voluminous discovery responses for mutual, AVEK, Van Dam, Bolthouse, and various farmers 7.8;</b>	<b>10.2</b>	
<b>12/28: Continue printing, organization and binding of phase 4 discovery documents 3.7</b>	<b>0</b>	<b>3.7</b>
<b>TOTAL ATTORNEY HOURS</b>	<b>48</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>12.7</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: November 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/2: Review D40 responses .1; emails to and from client .2;	.3	
11/5: Emails with Bunn and review RZ statement .1; email WL re injunction .1; review many CMC statements .3; emails with Bunn re drafting comm .1;	.6	
11/6: Review numerous cmc statements .4; review of latest settlement documents and markup of same 1.3; review opp to PO .1;	1.8	
11/7: Review D40 cmc statement .1;	.1	
11/8: Preparation of supp brief on expert motion, review prior pleading and party lists, and analysis re same 3.9; prepare proposed order .4;	4.3	
11/9: Travel to and attend court hearing on phase 4 trial and motions 3.4	3.4	
11/12: Review Bunn memo .2;	.2	
11/14: Emails to and from Bunn .1; call to Entrix re contract .2;	.3	
11/15: Conf call on drafting committee 2.8; conf with DOL re deal points .2; drafting and revisions of assessment comments .4; review of Bunn draft .1; review of discovery order draft and markup same .4; email to Dunn re expert contact .1; email comments re settlement points .6;	4.6	
11/16: Review of revised discovery order draft .2; prepare comments to same .1; emails to and from counsel .2; emails to and from client re settlement issues .4; review final discovery order .1; prepare modified proposed order for court expert .8; emails to and from Dunn .1; emails with counsel re discovery order .2; review hearing transcript .2; email to Fife re discovery .2; review proposed order .1; emails to and from client re settlement issues .3;	2.9	
11/17: Email with client .1;	.1	
11/19: Review discovery filings .3; emails to and from DE re Lancaster, research re same .6; amend order re expert .2;	1.1	

11/20: Review discovery filings .2; emails with Bunn and expert re contract issue .6; revise expert order .2; attention to filing expert correspondence .1	1.1	
11/21: Review Bunn filing, call to client.1;	.1	
11/23: Email with Bunn .1; emails with client re settlement points .4	.5	
11/25: Email with client .1	.1	
11/26: Review of Santa Maria ruling .7; emails with Bunn .1; review and analysis of settlement points and emails and calls to and from client re same 1.6; email to all counsel re settlement position .7; email to TT re status .3; emails with DO re SM ruling .2; file TT corr .1;	3.7	
11/27: Drafting comm meeting, memo to file 1.6; emails to and from DO and client re new PWS position .4;	2.0	
11/28: Emails to and from Moore .1; revise letter to LO counsel .4; emails with client .4; emails to and from Murphy .3; emails to and from BS .1;	1.3	
11/29: Travel to and attend Robie mediation session 15.1; review short and long form settlement documents .5; drafting of class settlement language, review of class member database and groundwork on expert work 2.2	17.8	
11/30: Analysis of revised settlement proposals and emails to and from counsel and call to WS re settlement issues .5; call with client re settlement issues .6; conf with DOL re settlement .2; prepare bullet points and email to WS .6; revise same .2; review PWS proposal and email to Bunn .5; further emails with client re settlement issues .4; emails to counsel .1; review expert exchange .1;	3.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>49.5</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>0</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: October 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/1: Emails to and from Dunn, Bunn and client re Robie .2; email to counsel re reporter .2; emails to and from BS re settlement .1;	.5	
10/2: Emails re reporter .1; review Rosamond discovery .1;	.2	
10/3: Review latest Robie draft .7; review Fife email .1;	.8	
10/4: Review comments of parties to current draft .5; many emails with Fife and counsel re Robie deal .5;	1.0	
10/5: Review US statement and numerous PO filings .2;	.2	
10/7: Emails to and from DO re feds .2;	.2	
10/8: Review dozen CMC statements .6; prepare CMC statement 1.0; emails with client .2;	1.8	
10/9: Emails with LL re settlement .1;	.1	
10/11: Prepare for hearings on class decert and expert motions, and CMC 1.7; review further CMC statements .3; review discovery responses of Murphy .1; review master settlement document and comments to same 2.4	4.5	
10/12: Travel to and attend court hearings 3.5; meeting with other parties re settlement and trial issues 4.8; review Satalino subpoena .1; emails to and from DO .1;	8.5	
10/14: Review Casey comments .1;	.1	
10/16: Email to LO counsel re class .4; email to all counsel re small pumper settlement issues .4; email to Fife re same .3; review order .1; emails to and from Bunn and counsel .2;	1.4	
10/17: Emails with DO and client re settlement .3;	.3	
10/22: Calls to and from Bunn and Fife .1; call from Bunn and memo to file .2; call with client .2; emails to and from DO re settlement .3;	.8	
10/23: Draft LO letter .5; draft brief re expert .4; emails to DO and client re same .5	1.4	
10/24: Commence work on master allocation order .6;	.6	



TOTAL ATTORNEY HOURS	22.4	
TOTAL PARALEGAL HOURS		

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: Sept. 2012

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/3: Review current settlement draft and notes re same .6;	.6	
9/4: Call with Zimmer and memo to DOL .4; call with client .2; prepare long settlement email to Dunn and revise same .7; email and calls to and from Sloan .5; email to DOL re same .1; review Casey comments .2; read LL email and response to same .2; emails to and from Sloan .2; review Bunn comments .1; review WM and RZ comments .1; call with client re settlement .4;	3.1	
9/5: Participate in settlement conference and memo to file re same 2.0	2.0	
9/6: Emails to and from client re settlement issues .3;	.3	
9/7: Review BB memo and current judgment drafts .5;	.5	
9/10: Emails to and from Hughes and review motion .3	.3	
9/11: Email to client on settlement .1;	.1	
9/12: Review of Weeks discovery .2;	.2	
9/14: Emails to and from client re settlement issues .5; review COLA comments .2;	.7	
9/18: Review Robie email .1; review AVWS comments .2; emails to and from DO and client re settlement .3; email to Dunn re same .1	.7	
9/19: Review PO motion .2;	.2	
9/20: Review Blum changes .2; emails to and from Dunn .1;	.3	
9/25: Review BB memo and current master draft .6; email to and from BS re class language .1; review opp to relief papers .2; email to client re Robie	1.0	
9/27: Review further comments to settlement .3;	.3	
9/28: Call from client .1;	.1	
9/30: Email to Dunn on settlement idea .2;	.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>10.6</b>	

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

**DATE:** August 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
8/6: Call from Martin re Sorrento status .3;	.3	
8/9: Emails to and from DO .1; return calls of two class members re lawsuit issues .6; call to RZ .1;	.8	
8/16: Analysis re landowner claims .2; emails to and from DO re strategy for same .6;	.8	
8/20: Review Zimmer email and notice of cont .1; call from class member Austin re lawsuit .4	.5	
8/21: Call and email to Dunn re settlement .1;	.1	
8/23: review order and recalendar dates .1;	.1	
8/25: Review Malibu Outrigger case re decert .3;	.3	
8/27: Review and analysis of most recent settlement draft and memo re same 1.1	1.1	
8/31: Review Blum comments .1;	.1	
<b>TOTAL ATTORNEY HOURS</b>	<b>4.1</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: July 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/1: Review prior hearing transcripts .6; complete reply brief and edit same, legal research on class issues 2.6; prepare declaration of MDM and exhibits .5;	3.7	
7/3: Receive and review March 13 transcript .2;	.2	
7/5: Review several trial setting statements .3; commence draft statement .6; email re settlement .1;	1.0	
7/6: Review 15 trial setting statements and complete, revise and file trial setting statement 2.1; brief legal research for same .3;	2.4	
7/8: Prepare for hearing 2.9; emails to and from DO re same .2	3.1	
7/9: Travel to and attend hearing on class motions and trial setting 2.6; memo to file re same .2;	2.8	
7/11: Prepare notice of continuance, and revise same .2; analysis and research on questions of partial settlements with water suppliers 1.2; prepare and file notice of cont hearing .2;	1.6	
7/16: Return calls of two class members re status of case and settlement .5; email from BB .1;	.6	
7/18: Review amended orders .1;	.1	
7/25: Review BB memo .1;	.1	
TOTAL ATTORNEY HOURS	15.6	
TOTAL PARALEGAL HOURS		0

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: June 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails to client re settlement .2; call with same re recent changes .3;	.5	
6/4: Participate in USGS conference and subsequent Joe S meeting 3.0; prepare summary memo re same .5; emails to and from RWalker .1;	3.6	
6/7: Review mandate petition .3;	.3	
6/8: Emails to and from client re decert .2;	.2	
6/11: Research on decertification 2.4; commence drafting of decertification motion 1.7	4.1	
6/12: Review prior expert filings and prepare expert motion .5; continue drafting decert motion 2.2; legal research for various issue in motion 2.6	5.3	
6/12: Review of further default and research in class database to locate erroneously defaulted class members 4.7	0	4.7
6/13: Drafting and revision of decert motion 5.4; prepare MDM declaration ISO motion 1.1	5.5	
6/19: Telephonic status conf with court, memo to file .7; review two CMC statements .1;	.8	
6/21: Review BB memo on settlement, current draft settlement and redline of same, markup same .9; review WW email .1;	1.0	
6/22: Participate in AVEK call, memo to file 1.1; email to same re class settlement redraft .1; email to group on settlement position .1;	1.3	
6/25: Review oppositions to motions re expert and to decertify .3;	.3	
6/28: Review AGWA objection .1;	.1	
6/30: Emails with DZ .1; legal research on issues for reply brief on decert and expert motion 2.7; commence reply brief 3.8	6.6	
TOTAL ATTORNEY HOURS	29.6	
TOTAL PARALEGAL HOURS		4.7



# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: May 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
5/1: Review six CMC statements .2;	.2	
5/2: Review BB memo .1; participate in hearing and memo to file re same .5;	.6	
5/3: Call from reporter .2;	.2	
5/8: Review RK letter .2; call to client .2;	.4	
5/13: Email from RZ .1;	.1	
5/14: Emails to and from client re settlement issues .3; review BB memo, call to client .1;	.4	
5/15: Review rampdown language and markup of same .4;	.4	
5/17: Email from Zimmer re settlement .1; review and revision of latest settlement draft, prepare limited version, email to counsel 1.7;	1.8	
5/18: Participate in AVEK settlement call 1.2;	1.2	
5/22: Analysis of draft changes and prepare further comments .8	.8	
5/23: Emails re settlement .1; call from class member Nolan re lawsuit status and property issues. .5	.6	
5/24: Review and analysis re Zimmer emails on settlement changes .3; further settlement emails .2;	.5	
5/25: Review transcripts .2; review Quartz Hill modified judgment .5; call and email to Brunick .1; call with Bunn .3; conf with DOL re strategy .3; prepare and revise long email to Zimmer and group re settlement .9;	2.3	
5/26: Emails to and from RZ .2;	.2	
5/29: Calls to and from BB .1; long email to Zimmer and counsel re settlement issues for class, call client, and revise same .9;	1.0	
5/31: Call with Bunn .5; analysis re motion to decertify and withdraw .8; email to Walker .1; review settlement terms, call to client, and email to Bunn re settlement terms .9	2.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>13</b>	

TOTAL PARALEGAL HOURS		
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# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: March 2012

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
3/1: Email to and from MF re Robie and settlement .2; research and analysis re viability of MSJ as to prescription claims 2.3;	2.5	
3/2: Review MO re trial setting .1; email to RWalker re error .1;	.2	
3/6: Review OSC .1; emails with LO counsel re meeting .1;	.2	
3/7: Emails to and from RZ .1	.1	
3/8: Further research on viability of MSA as to prescription 2.7;	2.7	
3/12: Review opposition and research re County arguments .8; review six CMC statements .4; email to LO counsel .1;	1.3	
3/13: Travel to and attend hearings (incl. continued expert motion) and status conference 2.5; review Weeks motion papers .1; email from Bunn re settlement .1;	2.7	
3/14: AVEK settlement call 1.4; review RK motion for reconsideration .3;	1.7	
3/22: Call from Thompson re status update on case .2;	.2	
3/23: Email to LO counsel .1;	.1	
3/27: Review weeks email and attachments .3; email to Weeks .1;	.4	
3/28: Review defaults notices and compare with class lists 7.4	0	7.4
3/29: Emails to and from client .1;	.1	
3/29: Review defaults notices and compare with class lists 5.3	0	5.3
TOTAL ATTORNEY HOURS	12.2	
TOTAL PARALEGAL HOURS		12.7

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
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# INVOICE

DATE: February 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
2/1: Review opps and other filings of this day .5; emails with BW re motion .1; emails with Putnam re Mason .3; call with R Valentine re issues with membership and property .4; review and analysis of Robie memo .4;	1.7	
2/2: Emails and call with Valentine .4; many emails with Weeks re discovery .6; emails with Putnam .1;	1.1	
2/3: Emails with Putnam re Mason issues .3; call with DE re settlement .3	.6	
2/6: Review reply filings on various motions .5; email to client .1;	.6	
2/7: Review Satalino discovery and opps .3;	.3	
2/8: Review BW motion filings .2; prepare and file statement re discovery 1.1; review and analysis re BB memo and watermaster regs, summary memo re same .8; emails to and from RK re class list .2;	2.3	
2/10: Review CMC statements .2;	.2	
2/13: Email to DE re settlement .2;	.2	
2/14: Travel to and attend trial setting conference, conf with client 2.9 (1.0);	2.9	
2/15: Review agenda, US corr, and Blum letter .1;	.1	
2/17: Participate in AVEK settlement conference 1.6; review some of the mass depo notices served .1; many emails with RK re appeal .4; review WW email .1;	2.2	
2/18: Prepare summary of depositions notice .6	0	.6
2/21: Travel to and attend principals settlement meeting 3.6; memo to file re same .2;	3.8	
2/22: Emails from WW and MF, review 7/11/11 transcript .4;	.4	

<b>2/23: Emails to DO re settlement .2</b>	<b>.2</b>	
<b>2.24: Further emails re settlement issues .2;</b>	<b>.2</b>	
<b>2/27: Review allocation, physical solution, meeting minutes on settlement .7; memo to file re same .2; email to Bunn .1; emails with Kuney re meeting .1; numerous settlement emails .4; analysis of Robie spreadsheets re allocation .4; email to WW, memo to file .2;</b>	<b>2.1</b>	
<b>2/28: Email to RWalker re hearing .1; emails with counsel on future dates .2;</b>	<b>.3</b>	
<b>2/29: Emails with RWalker .1; review notice and call to RZ .1;</b>	<b>.2</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>19.4</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>.6</b>

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
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# INVOICE

DATE: January 2012

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
1/5: Emails to and from DZ re appeal .2;	.2	
1/6: Call from Martin re status of case .3;	.3	
1/10: Review weeks motion to compel .2; legal research on decertification 5.9	6.1	
1/12: Email to Dunn and Bunn .2;	.2	
1/17: Review D40 motion for legal findings and legal research re same 1.3;	1.3	
1/18: Prepare motion for order re expert 2.8	2.8	
1/19: Review OSC filing .1	.1	
1/24: Call with Brian Martin on case status for Sorento, analysis re class status .6; emails to and from Weeks .1; review class exclusion analysis and prepare modified class member/parcel version, email to Weeks re motions .5;	1.2	
1/25: Prepare legal memo to DO and file re ethical and legal issues in decertification 3.8	3.8	
1/27: Emails to and from BW .1;	.1	
1/30: Emails to and from client .2;	.2	
1/31: Many emails (20+) with Putnam re Mason, and research and analysis re class members wrongfully named in Weeks' two pending motions 1.4; review opps to D40 motion .9; review BB memo, calendar same .1;	2.5	
TOTAL ATTORNEY HOURS	18.8	
TOTAL PARALEGAL HOURS		

# Law Office of Michael D. McLachlan, APC

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10490 Santa Monica Boulevard  
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Phone 310.954.8271 Fax 310.954.8271

DATE: January 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
1/2: Review memo and markup draft stip from Brunick re phase 4 trial .5;	.5	
1/4: Phone calls to client .2; review and analyze revised stipulations for trial .4; participate in liason comm call and memo to file re same 1.4; prepare and revise witness designations .5; emails to and from Veritext re liason comm decision and contract terms .2; review veritext contracts .2; email to all counsel re shared court reporter options .2	3.1	
1/5: Review dozens of witness designations and prepare list for depo notice priority and scheduling 1.3;	1.3	
1/7: Conf call with counsel, review and analysis of deponent list and designations 1.4; emails with LO counsel re depo issues .2; draft revised language on class to Liason Comm (LC) for stip, and email re same .4; review phase 4 depo schedule from weeks and analysis re handling and calendar issues .4	2.4	
1/8: Emails from LO counsel re deposition issues and scheduling .3; email to all counsel re group deposition pricing and management, revise same .4; review revised depo schedule and numerous further scheduling emails .5; email to TT re expert work .3; review letter re depositions, objections, and further scheduling many emails .3;	1.8	
1/9: Many (11) emails to Veritext re status of online calendar and handling of management issues .5; emails to and from Weeks and counsel re depo issues .2; review further objections .1; review Brunick memos .1; review liason comm agenda .1; prepare for Nebeker deposition, review discovery and relevant records 1.1; prepare for Voss depo, review discovery response .8	2.9	
1/10: Calls and emails with Veritext re video set up, virtual exhibit issues as well as calendaring case management .9; emails with all counsel on deposition issues .3; attend Nebeker and Voss depositions 6.2; review deposition objections and supplemental filings .3; emails to and from WW re AVEK depo .3; emails with Veritext on technical issues for depositions .2; review order on discovery conf .1; call from Kuhs .2; emails to and from Thompson (TT) re work .1; review of ex parte application and joinders .4; prepare and revise joinder re same .8;	9.8	

1/11: Review depo schedule and discovery filings, prepare for hearing to cont trial .8; attend hearing on ex parte to continue trial date, memo to file 1.3; many emails with LC re scheduling and depo issues .5; draft and revise First Amended CMO .6; email to LO counsel re First Amended CMO and discovery issues .4; review Bezerra comments and email to same .1; emails to and from RZ re trial issues .2;	3.9	
1/12: Review and analysis re voluminous discovery order responses of 14 parties and prepare summary memo re same 4.8;	4.8	
1/13: Emails re LC call .1; continue review and analysis of discovery filings of numerous parties and supplement memo re same 1.8;	1.9	
1/14: Participate in liason call re stipulations and CMO changes, memo to file 1.9; emails to and from liason counsel re suggested trial scope to CMO .4; further modification of CMO language and email to LC re filing .3; review email from TT re survey .1; review AGWA CMC stmt .1; research on in lieu pumping law .3; prepare and revise on first amend CMO draft language, email to LC re same .4; review revise class list to remove work product section .2; email to TT re survey and random sample .2; review CMC statements of Copa and AVEK .2; read Index of non-CA cases .5; review TT corr and prepare filing of same .3; review Bunn email and stip and decl draft .2;	5.1	
1/15: Draft long memo re depo procedures .5; email to LC re same .1; review Fife email and respond re LC issues .3; emails to and from Orr and Kuhs re disc issues .2; conf call re phase 4 trial issues, memo to file .7; review Kuhs comments to disc order .1; review LL email and amended trial schedule .1; call with Orr and emails to and from same and LC re order.3; prepare revised trial schedule filing and forward to LC for review .5; prepare order re phase 4 deposition procedures .7; review filings of today .2; email to LO counsel re hearing issues and strategy .4;	4.1	
1/16: Telephonic status conference with court and memo to file 1.8; emails to and from Bunn re stip .1; emails to and from Veritext re status and further handling of depo .2; email to R Walker .1; prepare and revise 1 <sup>st</sup> A CMO .6; email same to LC re same .1; emails to and from Dubois .1; modify order .3; email to RWalker re same .1; emails to and from Bunn and calls to PWS counsel re hearing .3; revise Order .2; email to RWalker re same .1; emails to counsel re return flows issue .2;	4.2	
1/17: Numerous emails with counsel re revised CMO and handling of same .3; revise CMO .2; email to RWalker re same .2; emails to counsel re status .1; call from DHall .1;	.9	
1/18: Call from DHall for school district on class membership and settlement issues, memo to file .4; emails to and from Kuney re decl .3;	.7	
1/19: Brief review Kuhs proposed PO and prior version .2; continue review of numerous discovery filings of parties and supplement memo re same 2.6;	2.8	
1/21: Email from TT and review database .2;	.2	
1/22: Call with Kuhs re many issues .9; review and analysis of PO .4; emails with LC re scheduling .1; emails with LO counsel re depositions .3;	1.7	
1/23: Emails to and from counsel re scheduling .2;	.2	
1/24: Call with RZ and RKuhs re AVEK issue and brief research on ethical issue .4;	.4	

1/25: Emails to and from TWhite court reporter.1;	.1	
1/28: Review draft hearing transcript .2; email to White re questions .2;	.4	
1/29: Emails to and from TWhite .1; emails to and from S Reed re transcripts .1;	.2	
1/30: Review Wagas declaration and emails to Renwick re changes needed to same .4; email to Bunn re stips .1; review Evertz declaration .1;	.6	
1/31: Review of 22 Fife client declarations and prepare summary memo of issues re same 1.6;	1.6	
<b>TOTAL ATTORNEY HOURS</b>	<b>55.6</b>	

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: February 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
2/1: Review Lane and PWD decls .2; review and analysis of Nelson and McCulough declarations and exhibits .7; review 24 Davis mutual supp responses and attached exhibits, and supplement master memo re: trial notes 4.1;	5.0	
2/5: Review Bowcock, Lopez and Latham decls .2; review eSolar and AV Solar discovery filings and supplement master trial memo re same .7; review Reed decl and exhibits, suppl. master trial memo re same .6; review and analyze SCE decl .2; review PPH decl and exhibits, supp. memo re same .6; review Joint Union filing .1; analysis and review Wagner decl and exhibits, supp memo re same .7; review Taylor decl .1;	3.2	
2/6: Emails with LC re scheduling .1; review Palm Ranch filing .1;	.2	
2/8: Call from School District re class .1; status email to TT .1;	.2	
2/9: 2/3: Review and analysis of 4 AVEK decls and exhibits and prepare summary of key information 1.3; review Scott and Boetsch declarations and exhibits and supp memo re same .6; review 11 CA entity declarations and voluminous exhibits, summarize same 2.3; review of Foth decl and exhibits and summarize same .3; review Chisam decl and exhibits, summarize same .4;	4.9	
2/12: Prepare for and attend liason committee call .6; memo to DOL re same .1; review revised Scott decl and update memo re same .3; review Metzger and Blum decls and exhibits, supp master memo .4; emails to LC .1; email to RWalker re ex parte .1;	1.6	
2/13: Phone calls re discovery order issues, and depositions .3; prepare ex parte application, proposed order .9; review Orr letters and schedule chart .2; emails to and from RK re depos .1; emails and call with client re trial issues .4; review PPH ex parte and answer .1; emails from RZ .1;	2.1	
2/14: Review weeks letter on depos .1;	.1	
2/15: Participate in depo scheduling call 1.4; emails to and from Kuney re trial issues .2; participate in court hearing, and memo file .7; review minute order and filings of this date .1;	2.4	
2/16: Research, analysis and evaluation of prior history of Boron CSD for potential Doe amendment 1.2;	1.2	



<b>2/19: Review Wagas supp decl. and revise master memo .3;</b>	<b>.3</b>	
<b>2/21: Emails with LC and LO counsel re depo scheduling .2; review RK depo schedule .1; emails to and from RK re depo notices .1; emails to and from RWalker re order status .1; call with Ralph re status and trial .2; review two new CMOs .1; numerous emails to and from LC and counsel re agenda items, stips and scheduling .4;</b>	<b>1.2</b>	
<b>2/22: Review and analysis of Kuhs depo notice and comments to same .4; participate in liason committee call and memo re same .8; review of US discovery response and revise master memo .6;</b>	<b>1.8</b>	
<b>2/23: Review US depo notice and objections, LL letter .2;</b>	<b>.2</b>	
<b>2/25: Call with landowners re depositions .9; prepare memo summarizing division of labor and projects .5; review Blum discovery filings .2; emails to and from Dubois .1; prepare for depositions of US witnesses 1.1; review Lewis email and decl, email to same re Warmack .2; email to DO re same .1; email to Weeks on depositions .1; many emails to and from Veritext and Weeks re depo issues .5; emails to and from Weeks and LO counsel re depo locations .1; email to Orr re stips .1;</b>	<b>3.9</b>	
<b>2/26: Attend depositions of US witnesses 5.8; emails to and from Lewis .1; review Fife ex parte and proposed order .2; review Grimway RFP, Tremblay notice and Miliband meet and confer .1; emails with LC re scheduling .1;</b>	<b>6.3</b>	
<b>2/27: Draft email to WW re AVEK and email to LO counsel re same .5; revise draft email and send to WW .2; emails to and from RK re same .1; review Brunick stip .1; many emails to and from Tyler and LC re depo issues and scheduling .5;</b>	<b>1.4</b>	
<b>2/28: Review Copa objection to US .1; call from D Hall and memo to file .2; review RK PWS depo schedule and emails to and from same re depositions and stips .3; review AVEK CMC statement .1; review Bolhouse CMC, amended version, Joyce filings, PPH objections and Copa statement .2; reiview Weeks, Bunn, Tejon and Fife filings .2;</b>	<b>1.1</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>37.1</b>	
<b>TOTAL PARALEGAL HOURS</b>	<b>0</b>	

# Law Office of Michael D. McLachlan, APC

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: March 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
3/1: Status conf and memo to file re same .6;	.6	
3/5: Review MO and calendar hearings .1; review proposed third A CMO .1;	.2	
3/6: Participate in General Brewer deposition 4.2; memo to file re same .3; email to R Walker re hearings .1; emails to and from Veritext re scheduling and technical issues .3; emails to and from RK re US .2;	5.1	
3/7: Call from D Hall .2;	.2	
3/8: Call with Kuhs .4; call with TBunn re depositions .2; emails to landowner counsel .2; review 3 <sup>rd</sup> A CMO .1; review Hallion materials .4; review objection and email to Weeks re 3 <sup>rd</sup> A CMO .1; emails to same re settlement .1; emails to and from RGK re PWD depo .1;	1.6	
3/11: Email and call from Entirx billing .1;	.1	
3/12: Liason committee call .5; review of Nebeker depo changes and substitutions, email to Fife .1;	.6	
3/13: Review of Nebeker depo transcript and prepare summary of same for trial 2.6; review AVEK CMC stmt .1; review and summary of Voss depo 2.1;	4.8	
3/13: AH Review and summary of Oberdorfer, Boetch, Brewer and Cummins depositions	0	5.3
3/14: Review CA ex parte and order .2; review Weeks discovery and deposition notice, CMC stmt of Copa .3; review Copa ex parte re stip and review file materials re same .2; revise Sloan settlement document and email to same .6; review RZ objections and Burrows decl .1; email from RK and email to WW re conflict .1;	1.5	
3/15: Telephonic hearing and memo to file re same .8; call with Bunn re Dennis depo and stip, memo to file .3; prepare instructions for handling first class mailing and review and numerous databases to locate missing address information and exclusion data .8; emails to DO re same .1; review numerous stipulations and email to McGuire re same .2; review Boron filings .1; review AV mutual stipulations .3; review MO and AGWA motion and stip .2; review Lewis stip .1;	2.9	
3/15 AH: Attention to locating addresses and preparing mail merge for class mailing 1.4; review and summary of Scott, Herbert, Hallion Bookman depositions 6.1	0	7.5

3/18: Prepare for Reed deposition 1.3; attend Reed depo including calls with Kuhs re handling same 4.7; call from Kuhs re various phase 4 issues, and potential injunction motion .5;	6.5	
3/19: Review and analysis of PWD P4 trial disclosures, summary expert report, and analysis re needs for deposition 3.6; call with Bunn re deposition issues and memo to file re same .6; email to LO counsel re strategy for handling same and trial issues .4; call from Bunn re PWD missing info .2; review notes on Reed testimony .2;	5.0	
3/20: Email to LO re further information on PWD depo .5; review Tejon and AGWA filings .2; prepare and revise letter to class members re expert survey and litigation status 1.4;	2.1	
3/22: Review Copa CMC statement .1; emails re depo scheduling .1; review Joyce stip papers .1; review and analysis re expert depo notices and attention to calendaring issues .6; review D40 ex parte and email to DO re same .2;	1.1	
3/22: AH: Attention to assembly and verification of class mailing on survey 3.8;	0	3.8
3/24: Review and analysis of RZ questions for PWD and email to same for clarification .6; call with Zimmer and memo to file .4; cross check class mailing and emails re issues with same .6;	1.6	
3/25: Travel to and attend hearing on stipulations and phase 4 trial, meet and confer afterward with all counsel 5.1; call from Zimmer re settlement .3; review depo notices and Zimmer letter .1;	5.5	
3/26: Emails with LC re scheduling and agenda .2; email to Fife re LC .1; emails with Bezerra and BB .2; review Leggio supp. .1; review and summary of Reed depo 3.7;	4.3	
3/27: Review revised CMO .1; liason committee call .8; emails to and from LC and counsel re depo scheduling .3; call with court and memo to file .4; review depo notices .1;	1.7	
3/28: Emails with RZ .1; call from Zimmer re settlement language .6; review 4 <sup>th</sup> CMO and email to Orr .1; review RK letter and depo notices .1;	.9	
3/29: Calls to and from Bunn and RZ re depositions .3; emails to and from counsel re depo scheduling .5; brief review and analysis of return flow MIL, review SoD and prior orders .8; emails with LO counsel re MILs .3; emails to and from Weeks and RZ .1; emails to and from LC re depo issues .1; several emails to LC and LO counsel re PWD issues .4; emails to and from TB and BW and LC re depositions .3; review new depo schedule and numerous emails to LO counsel and LC re issues .3; review US MIL and research on underlying authority, read several cases 1.1;	4.2	
3/30: Review MIL re reserved right and several underlying cases .9; review Rosamond MIL .1; review AVEK MIL .2; review WW40 MIL and RJN .4; review phase 3 ruling and email to LO counsel re RCSD motion .3; review QH MILs .2;	2.1	
<b>TOTAL ATTORNEY HOURS</b>	<b>52.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>16.6</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: April 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
4/1: Many (25+) emails to counsel re depo setting .4; review and analysis of PWD discovery and preparation of deposition notice .9; call from Bunn re depositions .1; drafting of settlement language and emails to and from Zimmer re same 1.8; review MIL filings.4; review new depo schedule and three emails re same .2; emails to and from LO counsel re depositions and trial issues .6; review depo notices filed today .1; email from TT re survey and payment .1; prepare notice of depo for D Lameroux and request for documents .3; many further emails re depo scheduling issues .3; emails with RGK re AVEK/BBK conflict issue .2;	5.4	
4/2: Review and analysis of US exhibits, prior evidence produced, and prepare summary memo re same 1.6; call from WM and review and execute stip .2; review meet and confer letters .1; emails re depo scheduling .2; emails to and from Entrix billing .1; review objection to CMO .1;	2.3	
4/3: Review RZ stip re groundwater and related records, discovery responses and settlement docs .3; review three filings on depositions .1; emails to and from LC re depositions and review calendar .2; return phone calls to 4 class members re lawsuit and survey 1.3	1.9	
4/4: Review and analysis of discovery materials to assess need to attend Dorrance depo .3; many emails re depo scheduling .3; calls to three counsel re cost sharing on depositions .3; review materials from BB re D40 depo .3;	1.2	
4/5: Further review of WW documents and discovery, prepare depo 1.8; prepare notice for Ariki depo .2; review of 5 depo notices and document demands .2; attention to calendaring issues and conf with DO .1; emails to and from STyler re depo issues .2;	2.5	
4/6: Supplement D Lameroux depo outline .5;	.5	
4/8: Prepare for Dennis L depo 2.6; travel to and take depo 3.3;	5.9	
4/8: AH Summarize Smith, Selak, Balhman, Kremen and Miner depositions 7.6	0	7.6

<b>4/9: Review and analysis of discovery material and prior filings to evaluate need to attend depos of Jones, Healy, Koch, Utley, Trembley, Beeby and Cortner .8; emails to and from LC re depo issues .2; review depo notices .1; review Bunn stip .1; review Dunn letter and objection to Ariki depo .1; emails to and from RZ re Utley .1;</b>	<b>1.4</b>	
<b>4/10: Prepare for Koch depo .5; attend Koch deposition 4.2; emails to and from RZ re Utley .2; emails to and from RGK re depositions .2; review D40 docs from same .3;</b>	<b>5.4</b>	
<b>4/11: Prepare for Ariki D40 depo, including review of discovery and other documents 3.7; analysis re need to attend Sanden depo .2; review voluminous materials from MF re D40 depo, and revise outline re same .6; numerous emails to and from counsel re depo issues .3;</b>	<b>4.8</b>	
<b>4/12: Complete prep for Ariki depo .5; travel to and take Ariki depo 5.5; analysis re need to take Beeby depo .1; numerous (15+) emails to and from counsel re depo scheduling and issues .3;</b>	<b>6.4</b>	
<b>4/12: AH Summarize Nye, Allesso, Reca, Barnes, and Wilson Siebert and Zomorodi depositions, edit three prior summaries 6.8</b>	<b>0</b>	<b>6.8</b>
<b>4/13: Analysis re need to attend Nelson depo .2; review and analysis of long MO re stipulation status and check filings on same .5; return calls to and from 3 class members re survey and lawsuit 1.1</b>	<b>1.8</b>	
<b>4/15: Emails to and from TB, and review stip .2; emails to and from RZ re Ariki .2; review Fife stip and decl .1; review Borax stip, Tremblay filings, RZ response, and two DE filings .2; call from RZ re D40 depo and trial .4;</b>	<b>1.1</b>	
<b>4/16: Analysis re need to attend Yurosek and Filkins depositions, review and analysis of Bolthouse materials re same .5; review depo notices .1; call from Tyler re depo issues and handling .2; analysis re need to oppose MILs and legal research re same 1.1; calls to LO counsel re same .4;</b>	<b>2.3</b>	
<b>4/16: AH Summarize Baharloo, Healy, Jones, Kyle depositions</b>	<b>0</b>	<b>7.8</b>
<b>4/17: Emails to and from BW re depo issues .2; review depo notices filed today, and objections .1; review and summarize Beeby depo 2.5</b>	<b>2.8</b>	
<b>4/18: Analysis re handling groundwater survey .6; review letters from JD and RZ .1;</b>	<b>.7</b>	
<b>4/19: Review and analysis of 14 law and motion filings re MILs .9; emails to BJ and BB .1; prepare joinder .1;</b>	<b>1.1</b>	
<b>4/22: Emails to and from Tyler re handling depo issues and cost sharing .2; email to RWalker re ex parte .1; review and summarize Hendrix and Tremblay depositions 5.4</b>	<b>5.7</b>	
<b>4/22: AH Summarize depositions of Javidi, Bowcock, Sanden, and Dorrance depositions</b>	<b>0</b>	<b>8.2</b>
<b>4/23: Review and analysis of SReed proposal re depositions and emails to and from same .3; review Calandri dec .1; review Copa ex parte .1; review PPH filing .1; emails from BW and review Copa orders .1;</b>	<b>.7</b>	
<b>4/24: Numerous emails with LL and counsel re settlement structure .4; settlement conf call with US 1.1; prepare depo summary for Lameroux 2.3; analysis re need to attend AGWA depositions and review documents re same .3;</b>	<b>4.1</b>	

<b>4/24: AH Review and summary of Beuhler, Yurosek, Filkins and Calandri depositions 8.1</b>	<b>0</b>	<b>8.1</b>
<b>4/25: Emails to and from client re settlement .3; review Zimmer filings .1; assessment of reporting proposal and emails re same .1; review and summary of Leggio depo 2.9</b>	<b>3.4</b>	
<b>4/26: Review and analysis of current settlement matrix and agreement .3; emails to and from LL re settlement .1; review US supp response .1; review Van Dam notice and objections, Satalino filings 1;</b>	<b>.6</b>	
<b>4/27: Call with Wood re numerous issues 1.0; commence ex parte draft .4;</b>	<b>1.4</b>	
<b>4/28: Emails and call with client .3;</b>	<b>.3</b>	
<b>4/29: Review court docket and analysis re does and roes status, willis class list .8; complete and file ex parte application 1.9; emails to and from client and DO .1; review Joint CMC stmt of AVEK .1; emails to and from Tyler re phase 4 transcripts .2; emails to and from counsel re depos .2; review US further supp response, modify US summary re same .4; review Kuhs filings .1; review Willis opposition .1;</b>	<b>3.9</b>	
<b>4/29: AH Summarize Wagner, Cornter, Perez, and Gorrindo depos 8.9</b>	<b>0</b>	<b>8.9</b>
<b>4/30: Prepare for and attend telephonic status conference 1.6; email to RK re hearing .1; review Copa stip filing .1; emails to and from LC re trial exhibits .1; review 4<sup>th</sup> amended CMO and stip order .2; review and summary of Wildermuth deposition 3.1</b>	<b>5.2</b>	
<b>4/30: Summarize Maritorena, Reca, C. Van Dam, and G Van Dam depos 7.8</b>	<b>0</b>	<b>7.8</b>
<b>TOTAL ATTORNEY HOURS</b>	<b>72.8</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>55.2</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: May 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
5/1: Emails to and from client re settlement .2; review 4 stipulations .2; review court order and discovery .2; emails to and from Cardno re billing .1; review and analysis of Bolthouse documents and witnesses .5; emails to and from LC re call .1;	1.3	
5/2: Emails to and from counsel re LC .1; review Cal Water filings .1; review changes to DL depo and update summary .1; attend LC call and memo to file re same .5;	.8	
5/2: AH Prepare summary of Taylor and Atkinson depositions, revise three prior summaries 5.4	0	5.4
5/3: Review weeks list .1; review and analysis of 15+ law and motion filings and prepare summary of same 1.3; brief legal research on return flow issues .6;	2.0	
5/4: Draft retainer agreement for LO complaint .2; prepare deposition summary for Ariki deposition and documents produced, including water supply assessments 2.7	2.9	
5/5: Emails to and from DO and client re trial issues .3; prepare cross exam for three US witnesses, review and analysis of discovery materials and documents, prior trial exhibits 3.4	3.7	
5/6: Emails to and from DO and client re trial issues .2; prepare joinder .1;	.3	
5/8: Review Tejon trial notices .2; review exhibit list .2; review Chester filings .1; review ex parte app .1; review various notices to appear at trial .1;	.7	
5/9: AH: review and analysis of default and cf with class lists, memo re same 3.7;	0	3.7
5/9: Review court order n/c; analysis of witnesses prep and depositions needing summary for trial .6; commence preparation of trial outlines for D40 and PWD 3.7;	4.3	
5/10: Review revised exhibit list .1; review and analysis of further Bolthouse exhibits .2; review AGWA depo changes .1; review MTC depo of D40 .1; emails to and from LC re trial exhibits .2; review RZ trial notices .1;	.8	

<b>5/11: Review and analysis of depo summaries and commence trial outlines for 9 AGWA parties, Bolthouse, Borax, and Diamond parties 5.2</b>	<b>5.2</b>	
<b>5/13: Attend hearing on MILs and trial issues 4.0; review Blum trust filings .3; emails and call with client re trial and settlement issues .8;</b>	<b>5.1</b>	
<b>5/14: Review PWD MIL .1; review two court orders .1; drafting and revision of LO complaint 2.8;</b>	<b>3.0</b>	
<b>5/15: Review stip matrix .2; complete witness outlines for cross exam of PWD, D40 2.1; prepare cross for QH 1.3; prepare cross for Cal Water .7; review and analysis of remaining AGWA parties and prepare cross for 13 of those entities 3.7;</b>	<b>8.0</b>	
<b>5/16: Review LandinV filings .1; assessment re need to attend Atkinson depo and review of related docs and discovery .3;</b>	<b>.4</b>	
<b>5/17: Attend hearing and memo to file re same .7; review stipulation matrix .2;</b>	<b>.9</b>	
<b>5/20: Email to Davis .1; emails to and from Cardno re billing .1;</b>	<b>.2</b>	
<b>5/21: Emails to and from RGK re trial .1; revise LO complaint .8; emails to and from DO re same and further revisions .3; emails to and from Davis re client list .2; review Tejon RJN .2; review revised US filings and supplement memo re same .3; prepare letter to class members re survey work 1.2;</b>	<b>3.1</b>	
<b>5/22: AH Attention to class mailing, merge, review of databases and research re missing addresses 5.7</b>	<b>0</b>	<b>5.7</b>
<b>5/22: Review COLA MIL .2; emails to and from DO re trial issues .3; review AGWA pretrial statement .1; review trial objections .1;</b>	<b>.7</b>	
<b>5/23: Settlement email to Ds .3; prepare letter to LO counsel .6; prepare notice of related cases .3; review CMO and MO .1; review Cal Water filings .1; review numerous stips and trial filings .4; emails to and from Garner .1; review Mutual filings and prepare summary memo re 21 of them for trial 2.4; review stipulation matrix and cross reference with filings .5; prepare for MSC and hearing .8;</b>	<b>5.6</b>	
<b>5/24: Travel to and from San Jose for hearing 7.8; review and analysis of 20+ trial filings, motions and stips filed today .9; update summary memo re same .3;</b>	<b>9.0</b>	
<b>5/26: Review 3 trial briefs file in last two days .3;</b>	<b>.3</b>	
<b>5/27: Attention to trial prep, including legal research on evidence issues, and review of various declarations of witnessess for LO parties 1.3</b>	<b>1.3</b>	
<b>5/27: AH Attention to preparation of trial exhibits for cross exam of US, PWS, and landowner parties 6.4</b>	<b>0</b>	<b>6.4</b>



5/28: Travel to and attend phase 4 trial 6.0; revise and finalize cross exam for D40, review of related exhibits and documents 2.7; review of Bolt brief, ex list and .3; review Boron trial docs .1; review Scott decl .1; review five Chester filings and prepare cross for same .8; review Borax trial filings .1; review state of CA five trial filings .3; review 4 D40 filing and trial brief, supplement exam outline .6; review Maguire filings and prepare summary re same .3; review new Davis trial docs .2; call to TT .1;	11.5	
5/29: Summary email to DO re trial .5; draft and revise proposed stipulation .7; travel to and attend Phase 4 trial 8.8; review supplemental Burrows filings .1; review AGWA filings .1; call with TT re survey and trial issues .3; review further Ariki decl .1; email and call from Bunn .1; review Leggio decl .1;	10.8	
5/30: Review 6 trial filings .2; travel to and attend Phase 4 trial 4.9;	5.1	
5/31: Emails to and from Maguire .1; email to Bunn re database .1; emails to and from S Blum .2; prepare summary memo re trial 1.2	1.6	
<b>TOTAL ATTORNEY HOURS</b>	<b>88.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>21.20</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: June 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
6/2: Review and analysis of Blum filings and Bolthouse lease and records 1.5; email to Blum .2;	1.7	
6/3: Call from Robert Jones re lawsuit and survey .6; email to Fife re same .1; review Blum letter .1; review and analysis of client records for survey 4; email to client re same .1; email to Blum .1;	1.4	
6/4: Emails to and from MF on joint clients and research in database re same .7; email to Blum re dispute .2; emails to and from client re pump records .3; email to Fife re Jones .1;	1.3	
6/5: Call from class member Streuss about lawsuit and survey .6; review and analysis of Wood records .2; review final stipulation numbers and check with trial notes .2; review Dunn letter and state filing .1; call from Cardno re billing issues .2; email to Davis re mutual issue .1; review and analysis of expert bills, prior order and prepare letter to PWS counsel, email to same .2; email to client re expert work .1;	1.7	
6/6: Email to and from RWalker re filing issue .1; call from client re settlement .4; emails to and from Cardno and Tootle .1; emails to and from Davis re mutual status .1; emails with and call to class member Jung re lawsuit and survey .5; emails to and from Garner re settlement and their interest in resolving case .1; call from class member Nye re lawsuit, survey and other issues .6;	1.9	
6/7:Email to Fife re common clients and revise same .2; emails to and from Garner n/c; review of add on petition .1; call from class member Hawkins re lawsuit and survey issues .7;	1.0	
6/10: Review prior settlement agreements and most recent terms, prepare email to Garner re same and proposed settlement .9; phone call with Garner re settlement, memo to file .4; email to TT re survey issues .1; emails to and from client re settlement moving forward with County .2; email to Fife re Nye .1; review of Jung records and call to same .3; email and call with Margo White re property and survey .3; long email to class member Wanda Leon re survey and data needed .4;	2.7	
6/11: Call from Hawkins .2; email to TT re Jung; call from B Smith re lawsuit and survey .6; prepare summary memo re class member contacts and information .6; email to TT re Hawkins .1;	1.5	

6/12: Call to class member Bovee re survey and lawsuit .6; email to TT re same .2; email to TT re Smith .1; review of Jung documents and email to TT and Jung re same .1; review email and proposed SOD from Dunn .2; emails with DO re same .2; prepare redline of SOD for Dunn .1;	1.5	
6/13: Emails to and from Cardno re billing .1; call from B Firsick re lawsuit and survey .6; call with classmember Leon re survey and lawsuit .4;	1.1	
6/14: Emails to and from Jung re pump test .1; review proposed SOD .1; review Kuhs opp to add-on .1;	.3	
6/17: Review of Bovee photos .1; review of amended SOD .1; attention to issues with class mailing and supervise same .5; review Kuney opp to add on .1; emails to and from DO re add on issues .1; review and finalize proposed order .2; email to TT re Bovee .1; emails to and from Garner and DO re settlement .1; calls to and from L&O firm re expert billing .1;	1.4	
6/17: AH Attention to further mailing, review of database for missing addresses, prepare mail merge 1.8	0	1.8
6/18: Call with WWellen re refusal to settle, memo to file .8; review mail merge for issues with addresses .3; review Brunick opp to add on .1; five emails to and from KL re expert issue .3; emails to and from Cardno re billing issues .2; email to DO re settlement blow up by Wellen and further handling strategy with partial settlement .3;	2.0	
6/19: Legal research on several settlement issues .6; email to Wellen re refusal to settle with class .1; review revised City of LA exhibits .1; call from class member Thompson re lawsuit and survey .4; emails to and from client re settlement .2;	1.4	
6/20: Review further amended SOD .1; emails to and from client re property history .1; call from CM McCrae re lawsuit and survey .6; email to TT re same and update master memo .1; prepare revised letter to class for survey .9; email to several class members and calls to same for input on content and tenor of same .4; revise and finalize letter to class .2; review and analysis of numerous class lists re errors in TT mailing list and address issues .7; email to TT re same and request for further sample .1; email to McCrae re survey .1;	3.3	
6/21: Review second amended SOD for phase 4 .1; emails to and from WW re Waterworks refusal to settle with class .1; emails to and from CM Nolan re survey and lawsuit .2; review and analysis of TT sample and cross check against master class lists for accuracy .4; email to McCrae and TT re same .1; email to RWalker re hearing and conf with DO re handling billing issues .1; review class member mailing project and spot check same against database .5;	1.5	
6/21: Further work on mailing issues with addresses, running mail merge, and attention to next mailing round 4.4	0	4.4
6/23: Review next round sampling from TT and cross reference with master class list to determine accuracy .4; return phone calls to 4 class members .7;	1.1	
6/24: AH Attention to additional class mailing for water survey 3.7	0	3.7

6/24: Emails and calls to and from CM Leon re water issues .4; email to client re same .1; email to client re help with survey outreach issues .2; emails with court re reporter issue .1; further emails with client re settlement and survey issues .2; check Cardno payment status, call to billing office, and email to TT re same .2; commence ex parte app re expert fee payments .7; attention to further class mailing, instructions re handling same .4;	2.3	
6/25: Email to TT re court hearing .1; complete ex parte app .3; emails to and from DE and TT re billing .1; email to RGK .1; email to TT re payment issues .2; emails with client re handling survey problems .3; emails to staff re handling class calls .1; call from JTootle re payment .1; call from CM Alexander re survey and lawsuit .4; call from CM Siebert survey and lawsuit issues, memo to file re same .5; email to TT re Alexander .1; review Lemiuex filing, research re same and email to same to withdraw .2; emails to and from DO re same .1; email to and from KL re expert motion .2;	2.8	
6/26: Call from client .2; emails to and from defense counsel on billing .1; call from CM Sosa re lawsuit and survey .4; review court notice and Dunn letter .1; call with John Thurston re lawsuit and survey .7; update master memo re same .1; emails to defense counsel re partial settlement .2; legal research on KL ex parte to modify order and prepare opposition to same .8; emails to and from DO re hearing issues .1; review Tejon opp to add on and objection to SOD, email to RGK .2; email from DE re settlement n/c	2.9	
6/27: Prepare for hearing .5; attend hearing and memo to file re same .6; emails to and from RGK re county records and analysis re same .3; email to Nolan re survey .1; emails and call with CM Stedman re survey and lawsuit .6; emails to and from RWalker re reporters .1; email to TT re Stedman and review KL letter .1; analysis re Cardno payment and email to same .2; emails and call with CM Brian re lawsuit and survey .5; call from CM Bellanca re survey and lawsuit .6; update master memo on survey .2; email to TT re same .1; call from CM Hoier re survey and lawsuit .4; call from CM Bellanca re same .3; call with B Martin re class status, memo to file .3; review Landsgaard letter and call to same re survey .2; review further revised SoD .1; call from CM Bailey re survey .2; email and call from CM Borja re property issues and survey, analysis re same and return call .4; call from CM Stevens re survey and lawsuit .5; update master survey memo on recent calls .2; email to client re status of suit .2; long email to Borja re survey issues .3; email to Landsgaard re survey and suit .3; email to TT re further mailing for survey .1;	7.4	
6/28: Review and analysis further TT sampling for survey .7; email to and from TT re Stevens .1; call from CM Anderson re lawsuit and survey .5; email from CM Garibay re survey .4; review court order .1;	1.8	
6/30: Review client email and call to same re survey .2;	.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>44.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>9.9</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: July 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/1: Long email to client re handling of survey .4; call from Classmember (CM) Wyatt re lawsuit and survey .6; call from CM Anderson re survey .2; two emails to TT re classmembers .1; research on Hoier and Gibbs properties .3; update master survey memo .2; email to client re survey .2; emails to TT re Jung and Garibay .2; check class website and emails to and from Morris re same .1; prepare new shorter form summary letter to class members for survey mailings .8; call from class member (CM) Lee re survey and lawsuit .3; emails to and from same re property issues .3; call to Gibbs re further questions .3; review KL motion re expert fees and Davis opp to add on .1; prepare letter to Strausser .5; prepare letter to Swayze .4; letter to Sosa and VM to same .3;	4.8	
7/2: Review records from 4 CMs re survey and update master memo .4; numerous emails with DO re handling of add on .2; call from classmember Conway re lawsuit and survey issues .5; call from CM Klecheski re lawsuit survey issues .4; email to TT re same .1; prepare and file notice of withdrawal re add on .2;	1.8	
7/3: Review and modify prior BBK settlement version and email to PWS re same .7; call with RK re status of various class issues .4; call from CM Nye re survey and lawsuit .3; call with CM Leon re same .2;	1.6	
7/6: Email and call with CM Lawani re survey and lawsuit .4; update master memo re same .1;	.5	
7/8: Call with CM Anderson re records issues .2; email to TT re Leon and Anderson .1; emails and call with CM King re lawsuit and survey .5; call from CM Dunn re lawsuit and survey .6;	1.4	
7/9: Emails to and from Walker re hearing .1; call from CM Banuk re survey, property issues and lawsuit .7; emails to and from classmember Bennie Moore .2; emails with Banuk re records .1; review AVEK records .3; email to TT re Banuk .1;	1.5	
7/10: Call from Cardno re billing issues .1; call with CM Bellanca .2; emails to TT re records .1; call with CM Thomas re issues with properties, lawsuit, and survey .6; review and analysis of 2012 transcripts re payment of expert fees and prepare experts of same for next hearing .7;	1.7	

7/11: Prepare notice re expert bills .2; emails to and from DE re billing .1; call from Swayze re ownership change and survey .4; update master memo re recent calls .3; emails to and from BBK and DO re payment issues .1; emails to and from Walker re reporting issues .1; emails to and from Bunn and TT re GIS data access .2; call to CM Strausser and emails with DO re same .1; review D40 add on and emails to and from DO re handling .2; review of expert bills and prepare notice of filing same .2;	1.9	
7/12: Prepare for hearing .6; tel. status hearing re add on petitions, prepare memo to file .7; review Phase 4 SoD .1; emails to and from Walker re future handling of reporters .1; call from Rosamond group re in person meeting .3	1.3	
7/15: Emails and call with CM Deckert re lawsuit and survey .5; call with Sosa re survey .2; call from CM Guillen re lawsuit and survey, property issues .6; update master survey memo .1; call to Bovee re .1;	1.5	
7/16: Call with Kuhs .7; call with Deckert re survey and lawsuit issues .7; call to Kuhs re motion issues .2; legal research on 1008 for LemiuX motion 1.0; review numerous oppositions, transcripts, and underlying record, and prepare opposition to LemiuX motion 2.4;	5.0	
7/17: Emails to and from Weeks n/c; review late filings of yesterday, numerous minute orders, and 4 filings of this day .3; travel to Rosamond to meet with CM group re survey and lawsuit 5.3;	5.6	
7/18: Call from CM Saxberg re survey and lawsuit .6; calls from two non-classmembers and research research re status .5;	1.1	
7/19: Call from Lisa Gibbs re survey and lawsuit .5; call to Olaf L, search public records re same, and email to TT re same .5; email to and from Cardno re payment issues .1; review reply on KL expert motion .1;	1.2	
7/22: Review King summary records and email to same and TT .2; review 5 filings of today .5;	.7	
7/23: Long call with Rogers re lawsuit and survey issues 1.0; calls from two landowners re survey .5; email to TT re status and further mailing .2; review and analysis of new class survey sampling and cross refer with other database and records .5; call from Cardno re potential conflict with other project .2;	2.4	
7/24: Phone call from Bellanca re survey and suit .6; phone call from Robbins re same .7; phone call to Weeks re settlement and memo to file .4; emails to and from class members on survey .3; conf with DOL re hearing .1; check public records and class database and email to TT re Rogers .2; emails to and from TT re groundwater data, and check records re same .3; prepare opt out form .3; letter to Strauser re same .3; prepare instructions for handling next mailing .3; emails to and from Bunn re conflict, memo to file .2; emails to and from CM Lytle re survey .3; email to TT re Rogers .1; calls and emails with CM King re records .2; emails to and from client re status .2; call from CM Robbins re lawsuit and survey .5; update master survey memo re recent CM contacts .4; emails to and from Lytle re records issues .2; email to TT re same .1;	5.7	
7/24: AH Research on prior class contact addresses and cross check hard files against class list for next mailing 2.2	0	2.2

<b>7/25: Call from Lauri Lytle re lawsuit, water association, and survey .8; review Lytle records and emails to TT re same .2; emails to and from Lytle .1; review mail merge file, conf with AH, emails to and from TT re errors in same .2; emails to and from Banuk re survey .1; check new sample data file and conf with AH re handling .4; review and analysis of mail merge file and cross check with databases to fix numerous errors with same 1.4;</b>	<b>3.2</b>	
<b>7/26: Emails and call to CM Morris re survey .1; email to TT re same .1; review court notice and call to DO re same .1;</b>	<b>.3</b>	
<b>7/28: Receive and review rural TC mailing list from Chiodo and emails to and form same re survey help .6; emails to DO re handling .1;</b>	<b>.7</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>43.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>2.2</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: August 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
8/1: Review revised Minute orders from phase 4 .1; emails to and from DO re add on .1	.2	
8/4: Call with Robert Morris re suit and survey .5;	.5	
8/5: Emails to and from CM Tom Stevens re survey and lawsuit.3;	.3	
8/7: Emails and calls to PWS counsel re expert bills .2; review and markup proposed CMO .4; analysis of Bellanca data summary and records .2;	.8	
8/9: Calls with F Ciodo re lawsuit, his property issues, survey, and gathering survey volunteers 1.3; call from Jim Tribizi re suit and survey .8; emails to and from KL and JT re expert bills .2; emails to and from Leon re records .1; call from CM Hernandez re suit and survey .4; email to TT re Tribuzi and update master memo .1;	2.9	
8/12: Call from Wanda Leon re survey issues .3; status email to TT , long call with Richard Skaggs .6	.9	
8/13: Call with Richard Skaggs re lawsuit, survey, Oso TC, and assistance with project 1.1; status email to TT .2; call from David Kerr re survey and lawsuit .4; update master survey memo .3; emails and call to Rogers re survey help .3; emails to and from DO re expert issues .2;	2.5	
8/14: Emails to and from Wood .1; long call with class member Houchen lawsuit, survey, and other issues 1.1; review Chiodo public notice for meeting and call to same .2; call with B Rogers re meeting and lawsuit issues .4; drafting and revision of summary memo of history of lawsuit for class members .8; prepare bullet point memos (short and long form) to class members re legal issues, expert survey, and litigation 1.5; email to class members re dissemination of same and meeting .3; call from Tom Houchen re suit and survey, email to TT re same .7;emails and calls with Birt and CM Pollack re lawsuit, property status issues .6; emails with client re meeting .1;	5.8	
8/15: Emails to and from Wood re meeting and survey.4; call with Rogers re meeting issues .3; emails to and from KL re order on expert payment .2; emails to and from Weeks re same .1; email to RWalker re hearing on billing problems .1; emails to and from DO re handling of Carno .2; emails to town council members .2; revise short form summary and email to Rogers .2; email to defense counsel re settlement .3; call with client re same .2; travel to and attend Fairmont town council meeting and meetings with various class members 5.8; review settlement correspondence from DE and WM .1;	8.1	



8/16: Calls with CM J McDonald re suit and survey .8; email to same re add'l info .2; call from B Rogers re article and survey issues .3; email to Kiodo and Rogers .2; review database re class member info .2; call from J Perkins re followup Qs after meeting .5; call to Wood .2; call with Miliband re settlement and expert .5; review of RZ jury trial brief and brief research re same .5; calls from CM Perkins and review records from same .2; email to CM King re survey project .2; email to Rogers re Oso TC .1; emails to 3 Fairmont members re survey and questions .4; email to Skaggs re help on survey .1;	4.4	
8/17: Review PWS and LO jury trial briefs, and legal research re same .6;	.6	
8/18: Review information on other town council, and calls to same .3	.3	
8/19: Call from Tootle re settlement .7; memo to file re same .1; review Hoier records emails to TT re Fairmont and followup .3; emails to and from J Werner for Zimmer .1; long email to WMilliband and revise same .4; emails and call with CM Workman re properties and lawsuit and survey .6; call with Austin re records and handling survey issues .5; emails from Cardno re billing problems .1; long call from P Hedlund re newspaper story, suit background and status, and small pumper issues .9; 8 emails to and from Hedlund with information regarding case, survey etc .7; call with Skaggs re lawsuit questions and Oso meeting .6; emails to and from same with information on survey and lawsuit for distribution .5; further emails to and from Hedlund re questions on story details .5;	6.0	
8/20: Call from Leslie West re survey and lawsuit .7; email to TT re same .1; review Lytle records and call to same re missing info .3; email to TT re same .1; call with Ron Banuk re his solar system and survey, flow meter install .4; email to TT re same .1; call from A Austin re his property, lawsuit and survey .8; call to H Maldini re lawsuit and survey .5; emails to TT re Maldini and Austin .1; call from Jeff Godde on lawsuit and survey, family issues, LO class suite, email to TT re same .7; call with Jacob Newcomer re suit and survey .6; email to Maldini with further information .2; emails to and from Skaggs re Oso meeting and planning for same .4; suppl. master survey memo .4;	5.4	
8/21: Check Godde class notes and emails with TT .1; emails to and from Weeks re payment, update memo re dame .1; many emails to CM Rogers re survey help .5;	.7	
8/22: Long call with Kerr .8; review BBK email and related documents .2; review and analysis of adjudication map, property records, class lists and prepare summary memo on Fairmont volunteers 1.2; email to TT re status .2; call from Entrix re BBK billing troubles and handling .3; emails to and from RWalker on hearing .1; emails to and from TT on same and class members .2; call with W Reasor re suit and survey .7; call with Earl Whiteside re same .5; call from D McCrae .1; emails to TT re class members .3; 3 calls from class members re lawsuit and survey .6; review new volunteer list and email to TT re same .2; prepare documents for class member meeting .8; travel to and attend meetings with class members 5.6; email to TT re billing .1; email to CM Lytle re records issues .2;	11.8	
8/23: Emails to and from KL and DL re expert billing .2; review Kerr documents and email re same .1; email to TT re billing troubles .1; review and analysis of mail merge and cross-reference against database, instructions re handling same .6; draft new letter to class members and revise same 1.1; review and revise summary memo .3; check survey mailing round 4 .5; call with Brown re lawsuit and survey .4; emails to and from DE re settlement .1;	3.4	

<b>8/23: AH: Attention to mail merge preparation .8; attention to mailing 4 and checking addresses against public records 6.7;</b>	<b>0</b>	<b>7.5</b>
<b>8/24: Emails to and from McCraes re survey water issues .3; draft new fees provision and email to DO re same .5</b>	<b>.8</b>	
<b>8/25: Analysis re class status of numerous purported class member volunteers, review records, cross-reference spreadsheets, and research public record filings .9; email to CM Guillen .1; email to Devoe re class membership problem .2; email to TT re status issues .2; phone call with M Guillen re purchase and well issues .5; email to TT re same .3; call with CM Webb's son .4; email to TT re same and Skaggs .1; update master memo re survey .3;</b>	<b>3.0</b>	
<b>8/26: Revise settlement agreement and email to D counsel .5; email to BBK re billing issues .2; calls from two class members re adjudication questions and survey .6; emails to and from Guillen re water suit and survey and Edison bills .3; call from same re assisting him with his issues, and Mr. Carrle .8; conf call with Bunn and Evertz re settlement and memo to file .7; prepare long email to TB and DE, revise same .6; email re expert billing issues with County .3; review of expert bills and prepare and file notice lodging .4;</b>	<b>4.4</b>	
<b>8/27: Review BBK billing email and call to Entrix billing in Dallas .3; long call with J. Kertzman re lawsuit and survey issues .8; call with Dumin re same .7; call with George Curtis re same .6; memo to file re class member calls .4; emails to and from TT .1; email to Dumin .1; emails to and from Landsgard re Rosamond meeting .2; emails and call with P Hedlund re further article .5;</b>	<b>3.7</b>	
<b>8/28: Call with DE re settlement issues, memo to file .7; phone call from T Steele re case and survey issues .7; phone call with H France re lawsuit and survey issues .6; long call with potential class member Devoe re well issues, property purchase, lawsuit history, and survey 1.1; email from C Gutierrez and analysis re her three properties and potential status in class, pull public records .6; emails to and from same re further details and class status .4; memo to file re class member calls .5; call from Roland Valentine re lawsuit status, property info, and survey .8; review Devoe files for relevant records, and emails to TT re same .4; phone call with Judith and Roger sides re lawsuit and survey .5; call from Robbins .2; emails to and from TT re several class members .3; emails to and from TT re Landsgaard family, review public records on various properties, and databases re same .7; emails with several class members on survey issues .3; review Newcomer records and call to same re issues and handling with SCE .2; calls to Landsgaard family members .2; update master survey memo and review class member records .4;</b>	<b>8.6</b>	
<b>8/28: AH Attention to organization of class member records and creation of survey folders for each, cross check MM master memo re same 4.7</b>	<b>0</b>	<b>4.3</b>

8/29: Review 14 class member voicemails and memo to file re same .5; call from Jeanne Gregory re lawsuit questions and survey .6; emails to and from N Clawson re survey .4; call from Fina and Martin Morel re lawsuit, property and survey .5; call with R Fennell re same .7; calls to and from Mike Ponce de Leon re survey .1; call with Diane Nelson re property history and survey .5; emails to and from C Francour re property and survey .3; emails with Weeks and Milliband .1; call with J Ward re lawsuit and survey .4; calls to and from Nye re same .2; call with Mark Thompson re same .7; call with Russ Clawson re lawsuit and survey .5; call from R Broffel .1; call with Jack Schietzer re survey and lawsuit, pumping history .6; long email to CM Guteirrez re survey and property issues .3; six emails to and from Valentine re same .4; call with Ted Schnaidt re lawsuit and survey .6; call with L Garcia re same .7; memo to file re class member discussions .5; review voicemail from 8 class members and emails to several re survey .4;	9.1	
8/29: Follow up calls to 24 class members re records for class water survey 5.8	0	5.8
8/30: Emails to and from L John re lawsuit and survey .3; review 11 class member voicemails, memo to file .4; emails to and from C Francoeur re suit, father, survey issues .5; call with CM Nelson re lawsuit and survey .5; update master survey memo re documents and phone call data .6; emails and call with T Landsgard re property issues .5; long email to defense counsel on settlement issues, conf with DO and revise same .9; call from CM Cashbaugh re survey and suit .4; email from D counsel re settlement .1; review PWD stmt of claims .1;	4.3	
8/31: Emails to and from CM Hoyt re survey and lawsuit .3; emails to and from DO re settlement issues .2;	.5	
TOTAL ATTORNEY HOURS	89	
TOTAL PARALEGAL HOURS		17.6

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: September 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/1: Further revisions to settlement agreement .8; analysis of production data and preparation of settlement grid .7; call with Devoe family re questions on lawsuit and handling their situation, class membership .7; email to Stevens re survey .1; long status email to TT .2; email to TT re Gutierrez .1; emails to TT re 11 class members .4; update master survey memo .6;	3.6	
9/2: Complete review and revision of settlement agreement and email to PWS .8; review settlement grid and email to PWS .1; call with De Leon re survey and property issues, memo to file .7; call with Prelewicz re lawsuit and survey, and other potential participants .6; call with Broffel re survey, water use, and impact of class exclusion .6; email to Stevens re survey .1; commence comprehensive memo re class member issues and survey status 2.4; email to TT re status .1; email to Dunn n/c; assessment of L John boundary issues and long email to same re survey .5; phone call from Mynear re survey and lawsuit .6	6.5	
9/3: Phone call with Tom Stevens re survey and lawsuit .6; review class member records and email to TT re same .1; phone call with Pat Connelly .4; call from Dave Hester re same .5; review Lemieux letter and conf with DO re same .1; phone call from R Large re suit and survey .5; call with T Stevens re suit and survey .3; review class member records and emails to TT re same .3; continue comprehensive survey memo .3; phone call with John Graham re suit and survey .6; call with Welsh family re suit and survey .4; phone call with J Tucker re survey, suit and property, research DB and public records to locate same .7; emails to three class members re survey issues .2; call with Dave Hester re suit and survey, property issues .5; email to TT re Hester and Stevens .1; two emails to TT re 5 class members .2; call with CM Webb re survey issues and other owner info .4	6.2	

<p>9/4: Review and analysis of John boundary issue, check public records, emails to John and Bunn re same .5; email to Gutierrez re property issues and survey .2; call from Avila re Del Sur, class status, survey, and options, memo to file .5; call from M Tucker re lawsuit and survey .4; call from S Macisaac re lawsuit and survey .5; call from Edith Hoyt re survey .3; follow up calls to several class members .2; email to TT re master survey list .1; call from M Doucette re survey and lawsuit .6; call from P Hedlund re survey status .2; call with L John and emails to and from same .4; emails to TT re class members .4; revise and update master survey memo .5; prepare ex parte re OSC on expert bills .7; call from Mary Murphey re survey and lawsuit, and email to TT re same .5; phone call from T Steele re pump records and survey issues .2; long call from I Csaki re lawsuit, survey, property, Willis class issue and fixing status in case .7; update master memo on survey .2; email to TT re Csaki .1; call from Kuhs re phase 5 and reporter .2; email to counsel on court reporting .2; phone call to T Munz .5; call with Quillen re survey and lawsuit .5; email to TT re same and survey status and handling .2; review Houchen email and check database records re same .2; review TT status email, check master memo count, and email to same .2; check file and records on Chiodo and email to TT re same and survey .2; emails to and from TT re Robert Morris .1; check public records and database on Schweizer and emails with TT re same .3; review records and notes re R Stevens, and long email to TT re same .4; emails to and from TT re Webb .1;</p>	<p>10.5</p>	
<p>9/5: Review survey memo and TT correspondence, prepare status report .9; emails to TT re same .2; call from Mike Grimes on survey and suit .3; call from Terry Munz re survey and property issues .6; call from S Brewer re same .5; email to court on 7/29 MO and review same .1; emails to and from DO re handling same .1; review docket filings of last month relevant to trial setting and other hearing issues, and prepare for hearing tomorrow 1.3; review Stip and order re expert fees and emails with DO re handling .2; review court orders and prepare objection to stip and order 1.1; call from CM B Munz .1; call with CM Fennell re survey and lawsuit .5; call to CM Enos re survey .3</p>	<p>6.3</p>	
<p>9/6: Travel to and attend trial setting conference and meeting with counsel afterward 4.1; email to liason committee re discovery .2; email to Wang and all counsel re meet and confer, phone call .2; call with David Masters re lawsuit and survey .5; review statements of claims .1; email to and from R Walker re invoices and hearing issues .2; review stip and order on expert fees .1</p>	<p>5.4</p>	
<p>9/7: Review 12 class member voicemails and supplement master memo re same .6; call with R Bryan re lawsuit and survey .3; calls to and from J Marguiles re same, and property issue with well .9; email to TT re Masters and SCE .1; call with J Coffman re survey issues and class status .2; call with S Davidson re survey and lawsuit, email to TT re her .6; call to CM Sterling re suit and survey .4; call from CM Huston re survey .3; call to CM Perkins re survey and lawsuit .4; call to CM Hill re survey issues .3; call to Damron re survey .5; update master survey memo .3;</p>	<p>4.9</p>	
<p>9/8: Emails to and from S Reed .1; emails with RZ re trial issues .1; review and analysis of survey files, update master memo, and research analysis re return mailing issues for random selection mailings 5.2; call with CM Ward re survey and lawsuit issues .4;</p>	<p>5.8</p>	

9/9: Review PdLeon fax and call with same re survey .2; review OSC, emails to and from BBK and call to D 308 re transfer .2; call from Sid Fromberg re lawsuit and survey, memo to file .9; call from class member L Levin re survey and lawsuit .4; call with Ad. Gonzalez re lawsuit, property and survey .4; call with K Wonnell re survey and lawsuit .5; review numerous class member records, and three emails to TT re 10 class members .6; emails to and from Dumin re SCE documents .1; emails with RWalker and Dunn .1; emails with RGK re discovery .1; update master memo re notes on 4 calls .2; prepare for and participate in discovery meet and confer conference 1.0; email to LC re meeting .1; call with Basner re lawsuit and survey, and multiple property issues .7; call with L Storsteen re lawsuit and survey .4; email to Guillen re pump test .1; email to Skaggs re survey status .1;	6.1	
9/10: Review and analysis of database and notice records re Basner propertites .2; call with Basner re survey and lawsuit, opt in issues .6; research on public records regarding problematic class member parcels .5; email to Basner re handling issues .2; review Marcoleise records .2; email to Rogers re status of records .1; review other client records received .2; emails to TT re supplement master survey memo .8; emails to and from DO re trial dates .1; review of 2014 trial calendar and email to Wang re same .4; email to Dunn n/c; emails to and from RZ re status .1;	3.4	
9/11: Call with T Crawford re lawsuit and survey issues .6; call from J Sulek re same .4; many emails to and from counsel on phase 5 and meet and confer .4; call to Dunn re handling .1; emails to and from RWalker re minute order issues .3; review and analysis of Weeks discovery and notes on issues to address .4; participate in meet and confer call 1.4; email to LO counsel re trial setting hearing .1; call with A. Floyd re lawsuit, property purchase, and survey .8; emails to and from L John re boundary issue .2; call to RZ re hearing .1; email to Dunn and email to TT re Crawford .1; emails to and from P Murphy .1; prepare and revise trial setting statement 1.3; review comments to statement from LO counsel .2; call with Zimmer on handling numerous phase 5 trial issues and structure of trial, memo to file .6;	7.1	
9/12: Long email to LO counsel re issues and strategy for phase 5 trial, and revise same .7; revise trial setting statement .5; email to LO counsel re revised version and comment deadline .1; phone call from Pat Murphy re add on to class, property issues and survey .5; call with Tim Coyle re survey and lawsuit issues .6; call from Matt Gormon re Jules records .1; emails to and form same review and analysis re class records of many class members, and supplement master survey memo .6; emails to TT re records .1; call to class member May Thomson on survey and lawsuit .4; review Murphy property records and email .1; call with Charles Maupin re lawsuit and survey .5; supplement master survey memo .4; review Zimmer statement .1; email with DE re settlement .2; emails to TT re class members .1; call from CM May Tong re suit and survey .4;	5.4	
9/13: Legal research on ethical issues raised by DE settlement emails and duties of class counsel in negotiation 1.2; draft email to DE re settlement framework and ethical issues, conf with DO and revise email .7; call with Zimmer re strategy and issues for hearing, memo to DO .6; prepare for trial setting hearing .3; attend trial setting hearing 1.1; prepare memo re same .2; emails to and from Rodgers re survey issues .3; calls with class member R Smith with class membership issues, lawsuit, class notice and survey .8; brief review of Add-on and conf with DO re same .1; emails to and from RK re same .1; review and analysis of Jules Marcogliese records .3;	5.7	
9/14: Emails to and from B Rogers re survey issues .1;	.1	
9/15: Emails to and from B Rogers re survey issues .1;	.1	

9/16: Review and analysis re numerous survey issues and prepare matrix re handling same .9	.9	
9/17: Call from Lester Miller re survey and lawsuit .6; emails to and from Jung re survey and call with same .5	.6	
9/18: Calls to and from Csaki re records .2; emails to and from Guillen re numerous issues on well and survey .4; research on records location with COLA .3; email to client re yield test handling .1; phone call with J Coffman re survey issues .3; phone call from J Cagigas re multiple properties, database and survey issues .6; call from class member Peggy Do re survey .3; call with CM Larson re survey .3;	2.5	
9/19: Review emails re LC and respond to same .1; analysis re Hoier .1; call with Tribuzi re survey issues .2; call with CM L Dunn re lawsuit and survey .7; update master survey memo .2;	.4	
9/20: Call with G Hogan re lawsuit, survey and property issues .6; memo to file re same .1; email to BBK re billing issues .2; brief review of 4 motions of RK and BJ .3;	1.2	
9/22: Legal research and analysis re coordination issues on CRC and statutory authority 1.6; commence preparation of opposition to Add-on Petition 1.8; emails to and from DO re add on issues .3;	3.5	
9/23: Emails to and from Hogan .1; further legal research on discovery act preemption of PRA rights 1.1; review of Ariki depo transcript for exhibit to opp .4; complete opp to Add-on Petition 2.0; emails to and from LC members and brief review of CS documents .2; emails to and from TB re L John parcel .1; email to TT re same .1; call and emails with John re further handling of parcel .3	4.3	
9/24: Call from S Brown re lawsuit and survey .6; call with Gregory re survey issues .2; review of class member records .2; review BB memo on return flows and email to LC re same .3; call with Joyce re motions and trial issues .5; call from class member Magyar re survey and suit .4; call with class member Maslanik re suit and survey .6; call with class member Hogan re survey .5; review LL schedule .1; emails to TT re class members .2; call with Reuter family re survey and lawsuit .4;	4.0	
9/25: Review and analysis and markup of draft CMOs .5; participate in liason committee call 1.0; memo to file re same .1; emails to and from Jung and Thompson re documents .1; call with Reasor re survey, email to TT re her docs .2; review of Large estimate .1; review and analysis of many class member records and many emails to TT re class member records .7; update master survey memo .3; emails to and from LO counsel re core phase 5 discovery .2;	3.2	
9/26: Review and analysis of client documents, master survey memo and calls with 5 CMs re survey .7; call with Evertz on settlement, conf with DO re same .6; call with class member C Tyler on lawsuit, survey, and handling his water issues .7; call with L West re survey .2; many emails to TT re CM records .3; call with J Kertzman re same .1; emails to and from P Lennox re survey .1; review and analysis of prior pleadings and transcripts re scope of Phase 3 and return flow issues .6; review and analysis of TT master spreadsheet and cf with our records on survey status .3; emails and calls with Bellanca re records .2;	3.8	
9/26: AH Reminder calls to 26 water survey volunteers 3.7; make new files for survey members and update existing files 3.4;	0	7.1

9/27: Emails to and from LC re draft status .2; email to LO counsel re work on CMO .2; review LL draft CMO, email to counsel .1; email to TT re Bellanca, update master memo .1; email to LO counsel re LC and CMO issues .3; call with class member P Lennox re survey and lawsuit .4; review various CMO drafts and prepare revised version 1.0; call with Sanders re CMO and email to DO .3; review of transcripts and order from Phase 3 on return flows .4; emails to and from LO counsel re handling CMO issues. 3; calls to RZ re same .1; email to Bellanca re records issues and handling .3; call from Hansen re transcript .1; call with Sanders re further revisions and LC deal, memo to file re same .3; emails with TT re Moore .1; modify and finalize proposed CMO .4; many further emails with LC re CMO .4; review Sanders further redraft .1; emails with LO counsel re handling CMO issues .2; review Dunn revisions and many further emails with LC re handling CMO .3; calls to several LO counsel re same .3; review PWS CMO .1; prepare notice of lodging re issue of return flows in Phase 3 1.2;	7.2	
9/27: AH check MM master memo against documents and files rec'd from clients 2.1	0	2.1
9/28: Call with CM Greg Hogan re opt in .2	.2	
9/30: Call from RZ .1; brief review of settlement agreement and emails to and from DE .3; phone call with class member Brown re survey and lawsuit issues .2; review of Hogan records and emails to and from same re property issues and class membership .3; review class member records .2; emails with TT re survey issues .2; review AGWA joinder and search phase 3 notes for status of expert report .5; email to LO counsel re CMO .1; call with RZ re CMO .4; review LL response to CMO .1; email to DO re settlement issues .2; emails to D counsel re settlement agreement .3;	2.9	
9/30: AH Prepare catalogue of returned survey mail and check mail merge files and database for alternate contact info 3.6		3.6
<b>TOTAL ATTORNEY HOURS</b>	<b>111.8</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>12.8</b>



# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: October 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/1: Review US motion to stay and conf with DOL re same .1; call from class member P Lennox on survey and lawsuit issues .4; meetin with S Reed re handling deposition deals for phase 5 and 6 .6; call from S Brown re survey and lawsuit .3; review Phelan trial filing .1; call with Evertz re settlement and memo to DO re same .5; call to CM Doucette .3; call from CM Suarez re survey and lawsuit .6; update master survey memo .3;	3.2	
10/2: Phone call with CM G Gregory re survey .2; conf with DO re handling settlement issues .2; review Doucette data .2; email to BB .1; legal research on domestic use issue .8; long email to DE re settlement and domestic use issue .5;	2.0	
10/2: Phone calls to 38 small pumper survey volunteers reminding about records and instructions on dealing with SCE issues 4.8; prepare summary memo re same .5; supp class member files with records and check master memo and spreadsheet re status and notes 1.4	0	6.7
10/3: Phone call with DE re settlement conf with DO re same .4; emails to and from R Walker re schedule .1; emails from DE .1, and conf with DO .1; call with R Walker re hearing issues .2; call with DE re settlement timing and issues, email to DO .3; emails to and from DE re numbers on settlement .1; review prior filing of settling Ds to confirm production numbers .4; emails to and from KL re confidentiality, conf with DO re handling same .3; review and markup of revised settlement agreement 1.4; prepare proposed judgment .4; phone call with CM Brown re lawsuit and survey .5; emails to client re settlement .2;	4.5	

<p>10/4: Emails with Bellanca re data .1; emails to and from TT re missing info, and analysis re same .4; settlement call with PWS counsel 3.0; email to RW re ex parte hearing Tuesday .2; call with CM B Moore re property issues and survey, review his records .4; email to Walker re ex parte .1; revision and editing of settlement agreement 2.3; three emails to PWS counsel re settlement .2; email to Bunn et al re handling County, revise same .3; call to CAA re class notice estimate .3; call to Rust re same .2; review US discovery .1; review and analysis numbers requested by Weeks per Willis and email to D counsel .4; long email to client on settlement update and status .5; emails to DO re settlement allocation issues .3; emails from Bunn and Evertz .1; detailed review and revision of settlement agreement 3.1; email to D counsel re same .1; email to client re further changes to terms .1; prepare BBK version of settlement and email to Bunn re handling same .5; further modification to settlement agreement, email to counsel re same .4;</p>	<p>13.1</p>	
<p>10/5: Emails with JT and DE .2; calls with DE and DO re settlement issues .5; review settlement agreement and input further DE changes .9; review Bunn email to D40 .1; emails to and from DE and TB re settlement issues .2; commence preparation of proposed class notice 1.1; emails to and from class administrator re plan and costs .4; emails to and from RWalker and call from same re settlement hearing .2; ten emails to A Horn re class notice cost estimate .7; emails to DO re billing .1; further revision and editing of settlement agreement and email with D counsel .8</p>	<p>5.2</p>	
<p>10/6: Long call with client re settlement agreement 1.1; further changes to agreement and email to counsel .3; emails to and from counsel re handling of ex parte .4; complete draft of class notice 3.3; emails to and from DE .2; attention to fees and costs analysis .8; legal research on good faith issue with fees 1.6; emails to vendors re cost issues .2; prepare settlement matrix .8; emails to and from Horn re notice .2; long email to defense counsel re settlement terms, revise same .7; email to DE re further numbers .2; 3 more emails with DE and TB re fees and costs .2; call with DE and memo to file re same .4; revise fee matrix and email to all counsel re same .6; review client signature and email re same .1; review comments from counsel and prepare revised version of settlement .4; revise class notice and email re same .1; attention to determining fees and costs, and long email to D counsel re proposal for resolving same by stip 2.3; further emails to DE re fees .3; email to D counsel re confidentiality .1; review Bunn changes and prepare new base agreements and notice .5;</p>	<p>14.8</p>	

<p>10/7: Email to KL re settlement .1; prepare and revise ex parte application OST 1.2; many emails with counsel re from and handling of same .5; email to KL re settlement .1; prepare proposed order on motion for preliminary approval .7; call with Bunn and DE re settlement, and revise same .2; emails with WM re approval .2; further revision to settlement agreement and emails re same .3; emails to and from R Walker .1; emails to Orr and other counsel on changes .1; review and revise class notice .2; prepare short form notice .5; emails to and from BW re approval .1; prepare motion for approval 3.3; emails to and from KL re his clients and settlement, and conf with DO re same .6; prepare allocation for these four Ds .4; emails to and from Tootle .2; revise judgment .3; 10+ emails re various settlement issues .3; call from CM Brown .2; further revise judgment and emails with Bunn re same .3; revise and finalize settlement agreement .8; prepare MDM declaration .6; review all papers for filing .7; further emails with KL, memo to file .2;</p>	<p>12.1</p>	
<p>10/8: Email to KL re settlement .1; review defense emails and email to same re signatures .2; prepare declaration for fees and costs .5; email to DO re same .1; emails to and from DE re settlement .1; participate in ex parte hearing and conf with DO re handling .3; long email to PWS counsel re further handling of settlement and info needed .5; analysis of B Moore material from Wildermuth and emails to TT and Moore .3; emails to and from DE and TB re D40 adverse position .1; call with class member M Guzman re lawsuit and survey .5; long email to settling counsel re class settlement procedure .4; review MO and prepare proposed order .3; email to Rwalker .1; email to DE and TB re global .1; email to DO re handling same .1; call from DE re fees, attention to declarations, pull case authority, and email to same .4; review and analysis of class member documents received this week, and 3 emails to TT re same .4; review KL email and email to TB and DE re same .1; emails to and from KL and DO re settlement .2; update master expert survey memo .3; review motion to stay .2; email to DO re same .1; emails to and from RGK re CMO changes .1; emails to and from KL re settlement .1; email to RWalker re motion to stay and add on .1;</p>	<p>5.7</p>	
<p>10/9: Emails to and from WW .1; emails to and from DE re settlement .1; call with DE re settlement issues and memo to file .5; call with TB re same .1; long email to settling counsel re D40 problems, conf with DO and revise same .8; review comments to draft CMO and revise same .7; emails with WW re stay n/c; email to DE re hearing conflict .1; email to LO counsel re further handling and questions re CMO .2; email to SC re D40 plan .1; email to and from DE re D40 plan .3; emails to and from BW re settlement .3; draft long settlement letter to WW, conf with DO re same, and revise same 1.5; review of prior correspondence and long email to KL re settlement .6; review Brown data and photos, update summary memo, and email to TT re same .3; email to client on status .2; review WW email and several further emails to and from him and counsel .4; email to client and DO re hearing .2;</p>	<p>6.5</p>	

10/10: Emails to and from DE re settlement .1; draft and revise long email to WW re settlement .9; email to DO re KL .1; emails to and from RGK .1; emails to and from AR re hearing .2; emails to and from class member P Murphy .1; emails with Bunn .1; review markup of CMO and modify same .7; prepare opp to US motion to stay and notice of lodging .6; email to LO counsel re same .1; call from CM Moore .2; email to Walker re stay motion .2; emails to and from client .3; many emails (30+) with D counsel re settlement issues .9; further WW email .1; call to same, and email to D counsel .1;	4.8	
10/11: Call from DE .1; email from Wellen ad return emails to DO and D counsel .2; emails with DE re signatures .1; call from atty Avila .1; call from J Belcher re filing issues .2; 20 emails re settlement approval .3;	1.0	
10/12: Email and call from CM Sloney re lawsuit and survey, update master memo .4;	.4	
10/13: Email to TT re Brown records .1; long email to TT re wait list folks .4; review new CM records, update master memo on survey .4; three emails to TT re survey .2;	1.1	
10/15: Call with class members Moore and Hogan re survey and lawsuit issues .6; call with Craig Stewart for Cook Bros re lawsuit and survey .5; review AVEK discovery .2; email to Walker re hearings .1; emails to and from TT, check CM files .3; review opp to stay motion .1;	1.8	
10/16: Prepare for hearings on ad-on and CMO .6; travel to and attend hearings 3.5; memo to file re same .2; email to RWalker re CMO .1; emails re approval .1; emails with Bellanca .1; email to BW re QH pull out .3;	4.9	
10/17: Prepare and file notice of ruling .3; prepare proposed order re add on petition .2; email to RWalker re same .1; emails re approvals lacking .2; email to Avila re status on Putnam .1; prepare and file notice of intent .1;	1.0	
10/18: Call with Michelle and Mark Thompson re survey and lawsuit .5; emails with settling counsel .1; call and email to class member Olsen re survey and lawsuit .4; email to Weeks .1; call to Tootle and Bunn re settlement .2; prepare notice of filing .2; review and analysis re class member master memo re persons needing to be added to class list, and review class lists and property records .5; prepare notice of filing signature pages .2; prepare opt in form .3; call with J Coffman re survey and class membership .3; prepare form for her opt in .1; call with R Pike re survey and class issues .4; prepare form for Pike .1; call to W Basner re opt in property .3; email to same re motion .2; review property records and email to P Murphy re class inclusion .2; email to Hogan re ad-on issues, and review records re same .2; prepare notice of intent for Phase 5 .1; call from Tootle re settlement .2; call with RGK re settlement and litigation issues .9; memo to file and email to same .1; emails to Murphy and Guillen re class membership .1;	5.7	
10/19: Emails to and from RK .1; review King records	.2	

10/21: Calls to and from RGK re settlement .5; email to CM King re survey .1; review court orders and docket on class notice orders .4; modify judgment, approval order and class notice .6; emails to TB and DE re same and status .2; email to LO counsel re non-opp .2; emails to and from RGK .1; emails to and from DE and TB .2; revise judgment and email to same .2; review Copa response .2; review RK and Rosamond filings .1; review opps to motion for approval .4; emails to and from DO re same .2; emails with D counsel re opps .2;	3.6	
10/22: Review 6/6/11 transcript, and prepare summary of same .5; many emails with D counsel re handling opps and hearing .5; review Bellanca records, update memo, email to TT re same .1; email to DO .1; email to and from DE re handling issues in opps .4; revise settlement agreement and email re same .6;	2.2	
10/23: Prepare ex parte re SCE records 1.9; emails with Bunn re approval .1; review CMO .1; emails to and from TT re survey .3; update master survey memo .2; emails to and from Bunn and DE .1;	2.7	
10/24: Reivew billing materials from BBK .1; prepare fully executed agreement and notice of same .4; call from CM Thompson and email to TT re same and docs .4; letter to all counsel re ex parte .3; review and analysis of AVEK discovery .2; emails with SCE .2; emails with TT re CM issues and attention to handling same .4; call with CM stevens and emails to and from same re membership .4; review WM memo for hearing call with defense counsel re same .6; email to NM re ex parte .1; review discovery order and conf with DO re same .4; emails and calls with JM re survey .3; legal research on CM MG property and call with same re survey .5; review Davis letter .1; preparation of ex parte re class membership list, including calls to clients and public records research 2.3; emails with counsel re hearing .2; prepare proposed order .3; prepare for	7.2	
10/25: Travel to and attend prelim approval hearing in San Jose and meeting with counsel re settlement 7.1; phone call with B Moore re membership and class issues .9; review court orders .1; emails with RW .2; calls and emails with Horn re notice costs and issues .8; revise and finalize notice .3; call with NM re SCE .3; prepare subpena for same .5; emails with counsel re settlement .1; call with BB .3;	10.6	
10/26: Calls and emails with CMs re ex parte .4;	.4	
10/27: Review Sloney materials on survey and call with same .6; email to TT re same n/c	.6	
10/28: Emails and calls with GCG re class list and notice issues 1.6; call with Rust .2; emails and calls with CAA re notice .5; email to D counsel re notice .3; many emails with GCG re notice .5; call with A Horn on notice .4; review and analysis and attention to numerous class list issues 3.9;	7.4	
10/28: Attention class list research and analysis for notice and correction of master list, conf with MM 4.5	0	4.5

10/29: Email to NM re SCE records .3; email to TT re same .1; emails and calls with administrators re notice .6; emails with RWalker re hearing .2; email to D counsel re notice .3; review class list 1.1; email to A Horn re notice project .5; emails with D counsel re same .2; further revisions and editing of class notice .4; many emails with A Horn on notice, and analysis of DB issues 1.1;	4.8	
10/30: Emails with NM re SCE .2; call to AV press re notice issues .4; review GCG final notice .5; emails with D counsel re same .2; email to WM re fee issue .2; emails with D counsel re publication .2; emails and calls with G Putnam re membership .9; email to TB re same .1; emails with BBK re expert bills .3; calls with GCG re notice .4;	3.4	
10/31: Emails with BBK re billing .2; emails with D counsel re notice .2; calls and emails with AV Press re same .4; emails and call with GCG re notice .4; call with J Nye re class .3; call with Putnam .3; review cover email for notice .1; call with DE .2; emails with A Horn .2;	2.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>133.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>11.2</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: November 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/1: Call with CM GP re water issues, lawsuit, property history, class membership, survey and options .8; emails with TB .2; emails with Horn re notice .2; emails and calls with Entrix re billing .4; review WE doc .1; emails with GP .2; review many trial filings .3; emails with NM re SCE .3;	2.5	
11/2: Prepare inclusion form for Putnam .2; emails to and from same .3; emails with GCG re notice and review materials .4; research and analysis of CM notice problems, public records review, revise list and emails with GCG re handling same 1.7; emails with GP, revise inclusion paperwork .4; emails with DE .1;	3.1	
11/3: Call with D Kent and emails to same re class .6; calls from CM re survey and review records .4;	1.0	
11/4: Emails to TT .2; emails with D counsel re settlement .3; emails with CM Daniels .2; call form AV Press .2; review of D40 disco responses .2; emails re publication .3; emails with Daniels re class issues .3;	1.7	
11/5: Review notice .1; emails with D counsel re notice .2; review Moore docs, calls and emails with same re opt out .8; review and summary of disco responses 1.2;	2.3	
11/6: Emails with Kent re class issues .4;	.4	
11/7: Settlement group conf call and memo to file re same .5;	.5	
11/8: Numerous calls from CMs re notice and settlement 1.6; review and summary of disco 1.2; email with D Kent re class .3;	3.1	
11/9: Calls from three class members re settlement .8;	.8	
11/11: Review and summary of disco 1.7; review motions filed .2; calls and emails re CM Barone .5; review GCG stats .2; many emails to and from CMs re settlement .7;	3.3	
11/12: Calls and emails from CMs re settlement issues .7; emails with GCG re notice issues .5; emails with TB re same .1; call with Barrone .3; review and summary of disco responses .6; review and analysis of new stipulation from US 2.3; review DE motion .2;	4.7	

11/13: Emails and calls with D counsel re final approval .8; phone calls from 4 CMs re settlement 1.2; memo from BB .1; emails with TT .1; review MSJ papers .3; analysis re survey issues and emails to TT .5; commence final approval motion 1.3; review and correction of billing statements 3.8;	8.1	
11/14: Research on one final J and fees issues 2.4; participate in settlement call 1.6; attention to decl of GCG re notice 1.2; call with NM re SCE records, memo to file .4; emails to and from TT .2; complete draft of final approval motion 3.5; emails and calls with RK re settlement issues .7; further emails with TT re survey .2; calls from 3 CMs re settlement .8; review weekly stats on notice and call to GCG .3; conf with DO re fees and motion .3; emails with DE .1; review and revise DO decl .3; emails with TT re survey .1; review and correction of billing statements 2.8;	14.9	
11/15: Emails with DO re fee motion .3; call with DE .2; several dozen emails with D counsel re approval motions .9; emails with GCG re notice and decl .5; emails with RGK .3; emails and call with NM re SCE .4; review motion limiting fees .4; emails and call with Lane re class .3; call from Deckert re survey .2; revise and finalize approval motion 2.1; calls from 3 CMs re settlement 1.1; email to RK .1; review and correction of billing statements 4.4;	11.2	
11/16: Review of hearing transcripts for fees motion 2.4; emails with DO re same .3; call with DE .2; attention to drafting of fee motion 1.6; review and analysis of CPUC decision .3;	4.8	
11/17: Analysis and preparation of fee motion documents, MM decl 7.9;	7.9	
11/18: Email to JD .1; review Oct hearing transcripts .3; review and summary of discovery responses 2.5; review weekly class notice stats .1; calls from two CMs re settlement .5;	3.5	
11/19: Email to D counsel re notice 1; call with CM Kling re settlement .4; emails with NM re SCE .2; emails with RZ .1;	.8	
11/20: Review BB letter .1; emails and calls with Entrix .2; emails to and from 3 CMs re settlement .5;	.8	
11/21: Calls with two CMs re settlement .5; emails to and from TB .2; emails with D counsel re notice .2; analysis re Lane properties and call and email with same .6; email to Rogers re settlement .2; email to TT .3; call from Mtn Ent re settlement .6; emails with JD re motion for fees .2; review WS settlement materials and prepare for settlement meeting 2.7;	5.5	
11/21: Prepare settlement binder	0	2.8
11/22: Emails re settlement .2; travel to and attend settlement conference 5.0; call with Bellanca re survey .3; call with May Tong re survey and settlement .6; review and summary of discovery 1.3; analysis re discovery .2;	7.6	
11/23: Call with B Basner re class membership .5; emails and calls with 6 CMs re settlement 1.2; calls and emails with B Moore .5;	2.2	



11/25: Legal research on standing issues on class actions 2.2; emails with RWalker .2; review and analysis ex parte application to continue approval hearing .2; prepare opposition to ex parte, decl of MM 2.7; email to Wang re website .2; emails with Krieger re settlement .3; emails and call with client .5; emails with D counsel re ex parte .3; emails with BBK re billing .2; emails with GCG re notice .3; emails with Moore .2; emails with RK re disco .3; review and summary of disco responses 1.4;	9.0	
11/26: Courtcall hearing, memo to file .5; call from CM Vartanian re lawsuit .4; emails with NM re SCE .2; emails with GCG re notice .2; email to WW .1; email to TT .1;	1.4	
11/27: Prepare and revise draft order .5; call with CM Bellanca re data and settlement .5; email to Rwalker .1; call with CM Basner re settlement and opt out issues .5; email to NM .2;	1.8	
11/29: Research on attorneys fees, hourly rate cases 2.1; review RB comments and email to same .3;	2.4	
<b>TOTAL ATTORNEY HOURS</b>	<b>105.3</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>2.8</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: December 2013

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
12/1: Continue review and summary of disco responses 2.5; email to AH re work on same and preparation for phase 5 trial .4; review of opposition to approval motion .2;	3.1	
12/2: Phone call from CM Davis re lawsuit and survey, update master memo .6; review and revise notice declaration .3; call from C Stead re class settlement and options .5; call with BB .3; review meet and confer letter .1; review court order n/c; emails and calls with RK re settlement .5; emails to and from WW .2; emails with D counsel re reply and POS .3; email to Deckert re survey .1; emails to and from A Brown and call with same re Lane .4; emails and calls with three CM re settlement .8; preparation of Horn declaration, emails and call with same 1.0; emails to and from TT re survey .2; emails and call with client re settlement .3; review revised GCG decl and call to Horn .4; emails to D counsel re opt outs .1; emails from RB re objection .1; review AVEK decl .1; emails with RW re ex parte .1; letter from Lane .1; review of filings and email to C Stead re settlement .4; review further revised GGC declaration and email comments re same .4; email to Walker re hearing .1; review Stead opt out and email to GCG .1; emails to and from NM re SCE .1; review further opt out and email to GCG and D counsel .1;	7.7	
12/2: Summary of disco responses 3.4; prepare expert disclosure summary and research on same 1.9;	0	5.3
12/3: Review BB comments to settlement draft .1; emails with 4 CMs re settlement questions .7; call with B Horne re same .4; research on membership issues re same .2; review and comment on updated GCG decl .3; email to RB re hearing .1; review minute orders re class .1; email to RW re same .1; emails with D counsel and review decl .2; emails to and from TT re survey .2; prepare supp MM decl re notice .6; email to RK .1; emails to and from NM re SCE docs, review and analysis of response to same .6; legal research for reply on final approval .8; prepare draft reply brief re final approval 3.8; conf with DO re same .2; emails with D counsel re same .1;	8.6	
12/4: Emails with RW .1; revise and finalize reply brief, prepare MM decl 1.2; emails with D counsel re hearing issues .2; review numerous case filings of today .3;	1.8	
12/5: Call with RGK re trial and settlement .6; emails to LO counsel .3;	.9	

12/6: Call with Janet McDonald re survey and lawsuit .6; Grace Fink call re lawsuit, new property, and survey .7; emails with RZ .2; review and summary of MW disco responses 1.3; emails with class members re settlement .5;	3.3	
12/7: Email to RWalker re stip .1; email to NM re records .1;	.2	
12/9: Emails with RK re disco .2; conf call with counsel re discovery order .7; call with RGK re handling phase 5 and 6 discovery, memo to file .7; review depo notices and email to BB re same .2; email to S Reed re reporting deal .2; emails with NM re records .2; emails with TT re same .1; email to TT re Larson .2; review Veritext proposal and call to S Reed re same .3; review of SCE records and further emails with NM and TT re same 1.1; emails to 4 CMs re survey issues .3; analysis re CM survey issues and further email to TT .9; emails to and from Reed re revised proposal .2; review GCG stats and email to D counsel and GCG .2; emails with McDonald re suit .2;	5.7	
12/10: Emails with CM Hogan .1; emails with D counsel re hearing .3; review settlement proposal .2; emails with 4 CMs re survey issues .6; emails with Reed re pricing terms .2; review disco order .1; prepare for final approval hearing, travel to San Jose for final approval hearing 4.3;	5.8	
12/11: Prepare for hearing .8; travel to and from attend hearing on final approval etc., meeting with counsel 4.3; call with RGK re discovery and phase 5 issues, memo to file .4; review MO n/c; emails with LO counsel re disco issues .3; review updated settlement drafts .9;	6.7	
12/12: Review and markup latest phy solution 1.6; emails with counsel re same .1; emails with LO counsel re disco .2; emails with B Rogers re hearing .3; prepare proposed judgment 1.7; email to TT re bills .1; attend settlement call, memo to file re same 2.1; email to counsel re class issues .1;	6.2	
12/13: Emails with client re settlement issues, and call with same .6; emails with D counsel re revised judgment .3; emails from TT re survey and attention to same .4; review and summary of disco responses .8;	2.1	
12/14: Email to DE re judgment .1; modify same .2; email to LO counsel re PWD .2;	.5	
12/16: Emails with BB re settlement .2; review final stats and emails with GCG .2; analysis re exclusion requests .2; emails with D counsel re same .1; emails with TT re survey .1; email to BB re disco .1;	.9	
12/17: Emails with BB re depositions .2; call with same re same .3; review Warnack records .2; attention to Warnack issues and emails with JL re handling .5; emails to and from TT re survey, analysis re records issues .4;	1.6	
12/18: Prepare outline for water supplier depositions PWD and Reed 1.3; attend part of PWD and Reed depositions 2.9; email to Reed re depositions .2; review Sept 6 transcript .2; review client records .2;	4.8	
12/19: Attend Palm Ranch deposition 1.0; call from RGK re depositions and strategy, memo to file .5; attend Littlerock depo 1.1; call with RGK re well 6A, memo .8; review and summary of disco responses 1.2; email to BB re Bones depo .1; emails to and from DE re Annex, analysis re same .7; emails to counsel re LCID issues .2;	5.6	

12/20: Review Rosamond discovery and prepare outline 1.2; participate in Perez depo, memo to file 1.9; call from RGK re same and injunction .2; review settlement documents .2; conf call with settlement group, memo to file 2.0; emails with DE re Annex .1; emails with AH re class list .2; review revised list and email to LO counsel re status .5; emails with Entrix re billing .2; review revised settlement terms .8; email form BB .1; email and call from D Wada re class .3;	7.7	
12/20: Analysis and revision of class list, analysis re class member households and dup entries 2.4; review and summary of disco responses 2.7	0	5.1
12/22: Email to LO counsel re LRID .1; review and summary of disco response 1.6;	1.7	
12/23: Emails with counsel re settlement .2;	.2	
12/24: Emails to and from LO counsel re LRID .8; email to D counsel re expert cost .3; review and analysis re Bellanca issues, emails with TT .3;	1.4	
12/26: Emails with TT .1; emails with GCG on notice .1; email to Wada .1; review Wood records and email to TT .2;	.4	
12/27: Review revised settlement docs .8; email re depositions .1; review draft motions on fees .4; emails with D counsel re same .3; emails re expert depositions .3; legal research for reply brief on fees 3.2; commence drafting of reply brief on fees 3.7	8.8	
12/28: Review and analysis of Leffler and Wildermuth transcripts, 2011 trial transcripts for expert depositions 3.3; email to Dunn .1; continue drafting of reply brief 4.7;	8.1	
12/30: Email to D counsel re fee allocation, review Willis filings re same .5; legal research on expert motion, markup DE motion and long email re same 2.3; emails with BH re depositions .2; emails with DE re motion .1; long settlement email and analysis of stipulation draft 1.1; emails with D counsel re motions and hearing .3; emails with LM re depositions .1; further review of settlement docs and new matrix, long email to LO counsel re settlement .8; email re class size .1; review MSJ papers .5; research and analysis on exhibits ISO of reply brief on fees 2.9	8.9	
12/31: Emails with Drake .1; emails with settlement group .3; drafting of reply brief on fees and MM decl re same 10.8	11.2	
<b>TOTAL ATTORNEY HOURS</b>	<b>113.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>10.4</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: January 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
1/1: Drafting and revision of reply brief and MM decl ISO of same, attention to exhibits 7.1	7.1	
1/2: Call with RK re settlement issues, memo to file re same .9; review of latest settlement draft and email to counsel re same 1.2; review Willis agreement and email to counsel re Willis issues .6; analysis of 85% cap issue, Willis agreement and long memo to LO counsel re negotiation issues on PWS allocation 1.3; emails with JD re stip .2; emails to and from LO counsel re allocation and other settlement issues 1.0; call from RZ .7; emails re depositions .2; further emails re settlement issues .3; long email to WS re settlement issues .4; emails with Reed re depo issues .2; emails to counsel re depositions .2; email to JD re same .1; emails this JD re meeting .1; email to RZ et al re US .1; prepare NOD for Williams .3; emails with LO re settlement .1;	7.9	
1/3: Conf call with settlement group 1.0; call with RK re settlement issues .5; attend Wagner deposition 1.4; emails with RK re golf course .2; emails with LM re depositions .2; email to LO counsel re settlement issues .6; emails to Reed re depo issues .1; emails with RWalker re ex parte .1;	4.1	
1/4: Emails re depositions .1;	.1	
1/5: Finalize judgment and prepare MM decl .6; prepare for Ariki depo 1.3;	1.9	
1/6: Long call with D Wada re class membership and county issues .8; emails with RWalker .1; attend Ariki depo, memo to file 3.5; emails with LO counsel re depositions .3; prepare and file ex parte re oversized brief .5; review and markup of proposed watermaster language 1.2; prepare proposed order on fee motion .3; email to Walker re order .1; emails and call with TB re same .3; emails with DE re RCSD .3; emails with TT .1; review fee order issues and emails with D counsel .4; review RZ disco .2; emails with TB re fees, review docs .4; email to counsel re settlement .1; revise and file judgment and proposed order .4;	9.0	
1/7/14: Travel to and attend court hearing on fees and other motions 4.7; email to RK re CMO .3; emails to CMs and TT re survey issues .4;	5.4	
1/8: Emails with DO re fees, meeting with same re trial issues .5; call with Dyas re class .5; prepare proposed order on fee motion, revised, email to JD .4; long email to D counsel re fee order .4; emails with client on status .2; emails with D counsel re depositions and settlement .2;	2.2	

1/9: Emails with TB re fee order .2; email to JD re same .1; email to RWalker re hearing .1; call and email with client re settlement .3; email to RWalker re order .2; emails with RK re CMO .2; emails with counsel re fee order .1; prepare for Flory depo .5;	1.7	
1/10: Attend Flory depo, memo to file 1.2; review and summary of disco responses 1.8; review and analysis of latest settlement draft, markup of same 1.3;	4.3	
1/12: Settlement group emails .1; review further settlement docs .4;	.5	
1/13: Review state language .1; settlement group conf call .7; emails with RK .1; emails with counsel re settlement .2; commence prep for Williams depo 1.1; prep for Wagner depo .8; review and summarize discovery responses 1.7	4.7	
1/14: Conf with counsel on order, memo to file .5; revise fee order and email to counsel .4; attend Wagner deposition, memo to file 2.7; prep for Beeby depo 1.3; emails with TT .2; emails with D counsel re settlement .2; email to RWalker re order .2; emails with TB .1; emails with DE re payment .1;	5.7	
1/15: Prepare for hearing .3; attend hearing on discovery issues, memo to file .9; review and analysis of Phase 3 SoD and emails to LO counsel re return flow issues and briefing .5; participate in Beeby deposition 2.6; call with RZ re phase 5 and 6 issues, discovery .9; landowner strategy call re handling depositions and trial issues, memo to file 1.0; review and analysis of summary expert report and preparation for Williams deposition 2.7; emails with LO counsel re disco and trial issues .6; conf call with LO counsel .6; review MC letter draft .1;	10.2	
1/16: Email to DE re RCSD .1; travel to and attend expert Williams deposition 8.9; call with RGK re handling expert issues and phase 5, memo to file .7; email to LO counsel re Williams issues .3; emails with LO counsel re model and disco issues .5; long email to LO counsel re Williams summary and trial issues .7;	11.2	
1/17: Review and analysis of settlement agreement and long email to counsel re comments 1.8; call from WS re small pumper and settlement issues, memo to file .7; further drafting of and markup of global judgment 1.2; participate in settlement group call 3.1; email to JD .1; many emails to counsel re settlement 1.1; call with WS .3; email to client re same .5; emails with TT .1; emails to DE re fees .2; email to RWalker .1;	9.2	
1/18: Review latest settlement docs, emails with counsel and client 2.2;	2.2	
1/19: Long call with client re settlement issues, memo to file .9; emails with counsel re settlement .2	1.1	
1/20: Attention to expert accounting issues .3; review further settlement redline .5; numerous emails re settlement .6; review and summary of disco responses 1.5	2.9	
1/21: Calls with Zimmer re phase 5 and 6 issues, handling D40 experts .9; letter to Jeff Dunn .4; review prior Joe S transcripts .7; call with RZ re settlement issue .8; review and analysis of revised judgment, client comments thereto, prior versions, and markup of J 1.7; email to client .1; email to LO counsel re settlement issues .7; emails with RK .2; meet and confer letter to JD re Williams .4;	5.9	

1/22: Call from CM re opting in .3; emails with LO counsel re settlement .3; emails with RWalker re fee order .1; email re settlement .3; email and call with client re settlement .4; call from Wada re class .3; emails with counsel re settlement issues .5; call with RZ re trial and Williams, memo to file 1.0;	3.2	
1/22: Review and summary of discovery responses 5.1; commence summary of depositions 1.8	0	6.9
1/23: Long email to LO counsel re strategy issues .9; call from client re global settlement issues 1.2; email to JD .1; 10 emails re handling Williams .3; emails with DE .1; many emails with counsel re settlement issues .4; emails with JD .1; call with JD .2; emails from TT .1; review further settlement revisions and emails re same .6;	4.0	
1/24: Emails with LO counsel on Williams .5; review Williams rough .3; emails with counsel on settlement .4; email to BB re reporters .2; letter to JD re Williams .5; analysis of lag time issues .5; review Jan 7 transcripts .3;	2.7	
1/25: Email to S Tyler re depo issues .2; letter from JD and long email to same re Williams.9; research and phone calls for modelling experts 2.3; many emails with LO counsel re same .7; emails with client re settlement and class issues .4;	4.5	
1/26: Review and analysis of motion filings and prepare for hearings 1.2; emails to LO re ex parte on return flows .3; email to RWalker re same .1; long email to LO counsel re trial strategy .7; review Dyas docs .1;	2.4	
1/27: Attend hearings on motions for phase 5, memo to file 1.2; call with RZ re settlement .5; emails with RWalker on hearing issues .2; review many filing of today .3;	2.2	
1/28: Preparation of ex parte application to continue return flow issue 2.8; review court order .1; emails with client re settlement .5; emails with LM .1; emails with R Walker .1; emails with TT .2; review and analysis of MILs .5; emails with DE re fees .1;	4.4	
1/28: Summary of new discovery responses 7.1	0	7.1
1/29: Emails with Martin .1; call with Wada .3	.4	
1/30: Prepare for hearing .3; attend hearing, memo to file .7; commence phase 5 trial prep on US issues, review prior testimony and summary of exhibits, draft outline Qs 5.5;	6.5	
1/31: Emails with Chiodo re settlement .3; review and analysis of voluminous trial filings and motions, legal research on phase 5 issues 3.7; review of voluminous discovery documents (part) 1.7;	5.7	
1/31: Summary of new discovery responses, prepare trial binders 8.3	0	8.3
<b>TOTAL ATTORNEY HOURS</b>	<b>133.3</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>22.3</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: February 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
2/1: Emails to and from CM Wada .1; email to LO counsel re Williams testimony .2; prepare joinder 1; emails to and from client .1;	.5	
2/2: Emails to and from LO counsel re unreported hearings .1;	.1	
2/3: Emails to and from LO counsel re strategy issues .1; review and analysis of discovery responses and trial exhibits and filings 1.1;	1.2	
2/4: Review and analysis of discovery responses and trial exhibits and filings 1.4; emails to and from Thompson .1; call from CM Godde .3; review of ex parte .1; emails to and from LO counsel re dismissal .1; review of Ariki depo transcript .8; review of Beeby transcript .7;	3.5	
2/4: Attention to indexing trial exhibits and preparation of trial binders 4.6	0	4.6
2/5: Review discovery responses of AVEK .2; emails to and from Thompson re survey .1; many emails to and from counsel re settlement agreement .3; review and analysis re draft settlement agreement .8;	1.4	
2/6: Review and analysis of MILs .9; call from CM Godde .2; review and analysis of AVEK records .3; emails to and from counsel re depo costs .1; review and analysis of new discovery response and trial exhibits .9	2.4	
2/6: Attention to indexing trial exhibits and preparation of trial binders 2.8	0	2.8
2/7: Review MIL replies .3; review and summary of Harder depo transcript 1.6; review and analysis of trial exhibits of US and PWS 1.2; review and analysis of Phelan disco responses .4	3.5	
2/7: Attention to indexing trial exhibits and preparation of trial binders 2.1	0	2.1
2/10: Travel to and attend Phase 5 trial 8.8;	8.8	
2/10: Attention to indexing new trial exhibits and modification of trial binders 1.7	0	1.7
2/11: Travel to and attend Phase 5 trial 6.3; phone call from Cardno .2; review and analysis of billing problem with expert .2; review expert exclusion briefing .3;	7	



2/12: Phone call from CM R Harvey re add'l class members and lawsuit questions .4; review and analysis of Flood transcript .8; emails to and from counsel re trial issues .3; review Rosamond stip .1;	1.6	
2/13: Many issues to and from LO counsel re trial strategy issues .4; review and analysis of AVEK witness depo transcripts 2.2; review new trial filings .3; emails to and from Wes Miliband re trial .2; emails to and from DO re trial status .2; prepare dismissal .2;	3.5	
2/14: Emails to and from counsel re trial issues .3; emails to and from WB re settlement and trial issues .5; emails to and from LO counsel re dismissal .2; review PWS RJN .7; review new trial exhibits .3;	2.0	
2/14: : Attention to indexing new trial exhibits, and judicial notice filings, and modification of trial binders 2.2; summary of Perez and Wagner depositions 3.9;	0	6.1
2/15: Email to and from LM .1;	.1	
2/17: Status email to class member listserve 1.1; review and analysis of new trial briefs and exhibits 1.2; prepare summary of key trial exhibits and cross exam notes 2.3;	4.6	
2/17: : Attention to indexing new trial exhibits, and judicial notice filings, and modification of trial binders 1.3	0	1.3
2/18: Travel to and attend Phase 5 trial 9.3; call with CM Wada .2; review and analysis of many new trial filings .8; emails to and from LO counsel re Williams and trial issues .2; email to client re settlement agreement .1;	10.6	
2/19: Travel to and attend trial and attend mediation session 12.2;	12.2	
2/20: Travel to and attend mediation sessions 9.4; emails to and from D Hall .1;	9.5	
2/21: Email to US re settlement .1; travel to and attend mediation sessions, memo to file 7.7; email to LO counsel re Willis language .1;	7.9	
2/22: Review balance assessment language .1;	.1	
2/23: Emails to and from LO counsel re handling class issues .9; emails to and from counsel re Willis language and strategy .3; review Long Valley decision .2; revise Willis settlement language and long email to counsel re same 1.6;	3.0	
2/24: Emails to and from WM .1; call from Entrix re payment issues .2; email to counsel re Willis language .2; email to US re balance assessment .1; many emails to and from counsel re trial cost issues .4; many emails to and from counsel re settlement issues 1.8; email to M Davis re trial .2;	3.0	
2/25: Emails to and from M Davis .2; phone call with client re settlement .5; emails to and from WM re settlement .2; review revised draft agreement .4; review and analysis re Chester matrix and allocation issues, review underlying LO docs and discovery summary re same 1.8;	3.1	
2/26: Emails to and from CM Wada and Thompson .1;	.1	
2/27: Review AVEK return flow brief .2;	.2	

TOTAL ATTORNEY HOURS	89.9	
TOTAL PARALEGAL HOURS		18.6

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: March 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
3/3: Emails with B Paez re class issues .2; emails with CM Rodgers re public meeting .1; review and analysis of discovery responses of Tejon, QH, D40, Cal Water, Palmdale, Rosamond CSD and Crystal 1.1; emails with client re settlement .1;	1.5	
3/4: Call with LL re settlement and memo to file .3; emails with counsel re trial stips, and D40 settlement announcement .4; email and call to RWalker re ex parte status .1; review ex parte application and emails with LO counsel re response to same .3; emails with SOrr re settlement changes, review agreement .1; email to BB re settlement .1;	1.3	
3/5: Phone call to BB, emails with same .1; call with Dunn re settlement, memo to file .5; call with RGK re settlement issues and trial .4; call from County re Wada issues .3; emails with WW and counsel re settlement .2; review ex parte filings .2; draft and revise ex parte response .6; email to LO counsel re settlement talks .1; call with client re settlement issues .2; email to US re balance assessment .1;	2.7	
3/6: Attend ex parte conf call and counsel discussion, memo to file .9; review latest US draft .2;	1.1	
3/7: Call from Tom Bunn .1; review draft stipulation .5; email to all counsel re changes to same .3; many (15+) emails with LO counsel re Bunn call and settlement issues .5; emails with client re settlement talks and current draft .1; review memo from BB .1; emails with DE re Rosamond .1; phone call from B Martin re class status and settlement .3; emails with CM Harvey .2;	2.2	
3/8: Review and analysis of Palmdale's discovery responses .4; email to LO counsel re US remedial issues .1;	.5	
3/9: Revision of stipulated Judgment 1.2;	1.2	
3/10: Complete review and revision of revised stipulated J .8; prepare project list memo and cross reference with draft redlines, revise same .7; participate in conf call re settlement 1.1; call from RZ and JD re class issues, memo to file .3; email to same re call to RK .2; email to LL re draft J issues .1; email to Sloan re class issues .1; emails with RGK re settlement .1; emails with counsel re Willis issues .1;	3.5	
3/11: Emails with client re settlement meeting .2; emails and call with CM Wada .6	.8	

3/12: Travel to and attend settlement talks 8.2; detailed review of latest redline draft and prepare revised language 1.1;	9.3	
3/13: Travel to and attend settlement talks 9.4;	9.4	
3/14: Call with RGK re settlement status and handling allocation issues .6; review AVEK trial filings .1; emails and call from Cardno re billing .1; review of D40 MIL and motion .3;	1.1	
3/15: Draft long email to BS and RK re allocation issues, edit same .5;	.5	
3/16: Emails with LO counsel re settlement .1	.1	
3/17: Many emails with RGK re settlement issues .2;	.2	
3/18: Travel to and attend settlement meetings 8.7; call with RGK re same, memo to file .5; calls and emails with client re settlement .4; email to LO re trial continuance .1;	9.7	
3/19: Emails with Wada re class status .1; review US discovery responses .1; email to LO counsel re settlement issues .2; review draft exhibits and emails with counsel re same .2; emails with PWS counsel re payments .1; analysis re Cardno billing and email with RW re ex parte .2; phone call from CM Dyas re property issues and settlement .5; email to Brunick re same .1; prepare inclusion request form for Wada and emails with same .2; prepare Dyas forms and emails with same .2; emails with Maline re billing issues .1; prepare dismissal paperwork and service instructions re AV Materials case .3; prepare ex parte app re approval of expert bills, analysis re same .3; review Dyas forms and email to same re filing .1; revise ex parte with POS, amend filing instructions .1;	2.8	
3/20: Review US ex parte .1; review of ex parte re expert bills and prepare supplement to same .2; review Wada forms and email to same .1; review CMC statements .1; emails with MF re settlement gap .1; return phone calls from two class members re settlement issues .7	1.3	
3/21: Emails with MF and RGK re settlement .1; attend status conference, memo to file .5; many emails (12+) with Cardno re ex parte and billing .3; email to US and D40 re settlement closure .1; phone call from atty svc re CCW filing issues and emails with RW re same .1;	1.1	
3/24: Emails with client re settlement .1; brief review latest draft of physical solution and emails with LO counsel re same .3; phone call from CM Resor re settlement issues .5;	.9	
3/25: Call with RGK re handling settlement issues, memo to file .6; detailed analysis of current version of stipulation of settlement, and compare with last version 1.4; emails and call with client re settlement issues .4; emails with counsel re settlement .2; email to MF re juniper group .1; review RGK summary settlement terms memo .1; email to JD re missing settlement terms, email to client re same .1	2.9	
3/26: Participate in settlement negotiations 6.3; long email to client re changes to class section .5; phone call with client re revisions to class language .2; email to Garner et all re new settlement language .4; emails with LO counsel re Annex and class list cross over .2; emails with RW re filing issues .2; many emails with LO counsel re settlement issues .2	8.0	

3/27: Emails and call with D Revelt re class membership issues .5; prepare ex parte application for add on .5; public records search on Wada and Dyas .1; email to Wada re issues .1; call to same .2; analysis re Llano Del Rio membership issues .3; email to Carson re same .1; review and analysis of AGWA records and discovery, and many (30+) emails with RGK and WS re issues with same for allocation 2.8; review WS AGWA spreadsheet .1; call with Weeks re AGWA issues and settlement, memo to file .4; review of central basin judgment .2; email to LO counsel re juniper .1; emails with MF re AGWA issues .4; review AVEK deliveries summary and analysis of AGWA claims .4; return phone calls to two CMs re settlement issues .6;	6.8	
3/28: Calls to Wada and Dyas re ex parte .2; review and revise same and prepare proposed order .4; email with RW re same and filing issues .1; prepare amended ex parte .2; receive and review revised class forms, and prepare errata .3; call with JD and WW, email to DO re same .2; emails and call with client re settlement issues .3; email re settlement agreement revision .1; review and analysis of CM records and emails to TT re same .3; email to LO counsel re filing issues .1; review new balance assessment language .1; emails with Wada re claim .1;	2.4	
3/29: Emails with counsel on settlement, review new language .2; review and analysis of jury trial motion, and reply for same .4;	.6	
3/30: Review and analysis of AGWA materials, discovery re claims 1.0; emails with counsel re settlement issues .2; review of new judgment .3	1.5	
3/31: Review and analysis of latest version of stipulated judgment .9; emails to and from LL re same .1; travel to and attend settlement conference at BBK 9.8; phone call from Carson and	10.8	
<b>TOTAL ATTORNEY HOURS</b>	<b>84.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>0</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: April 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
4/1: Participate in court hearing, memo to file .6; phone calls with numerous parties re settlement issues 1.1; long settlement proposal email to LO counsel .9; 20+ emails to and from LO counsel re settlement ideas .3; call from client re status of settlement and trial .6; prepare further settlement language and review class language .4; assessment re Llano and other class list issues, and several emails with Carson re same .5; emails with PWS counsel re expert issues .3; assessment re Kuney proposal .1; participate in LO settlement conf call 1.9; call with BB re settlement .2; long email to JD re status of same .3; email to LO counsel re BB and settlement issues .4; research on AVEK class member issues and emails to LO counsel re same .2; email to LO counsel re Rosamond Annex .1; emails to DO and RW re trial .1; email to RK and WS re AVEK and trial .2; email to DO re status on settlement .1; phone call from Carson and analysis re class list issues .3	8.6	
4/2: Emails with BB .1; emails with LO counsel re settlement issues .2; call from RGK re allocation and settlement issues, memo to file .6; emails with MD re mutuals .1; call with CS re settlement issues .5; call with JG re City and settlement issues, memo to file .5; email to LO counsel re status of public overlies .3; emails with class members re status of admission .2; review and analysis of Cal Water expert payments .2; email to Tootle .1; review Jan G settlement comments .2; review phase 5 new trial exhibits .3;	3.3	
4/3: Long settlement email to LO re allocation .5; emails to and from MF re settlement proposal .2; participate in settlement meetings telephonically 2.1; phone call with RK re Willis agreement points .6; drive to and attend settlement meeting at BBK 6.1; status email to Kuney on AGWA position .2; email to settlement group on AGWA status n/c; review and analysis of Juniper Hills list and current class list for conflicts, email to LO group re status of same .5; email to Fife re status and removal n/c; review ex parte application re phase 6 .1; emails to and from JD re settlement .1; review and analysis of current allocation Ex 4 .6; emails to and from DE re Annex .2; emails to and from RGK re settlement .2; review Exhibit 6 .1; emails to and from counsel re settlement .1; emails to and from LO counsel re allocation and Juniper, class list .2;	11.8	

4/4: Conf with DO re settlement issues .4; attend status conf re settlement .5; phone call form WM re Phelan settlement issues, memo to file re same .7; prepare and revise email re AGWA water .2; research and analysis re legal authority for cramdown .6; long email to LO counsel re same and prescription .4; review Mojave case and email to LO re transfer issue .4; review Phelan emails and email to LL re ex 5 change .1; email to group on status of call to RK re Willis .1; prepare and revise email to settlement group re Phelan call .2; analysis re conflict issue, review Rutter, and long email to LO group re AGWA strategy going forward .8; email to LL re Phelan invite .1; emails to and from LOs re AGWA .1; email to JD re Phelan .2; review draft Ex 5 and email to RGK re same .1; review LAWA special provision, past drafts of stipulation, and emails to LO counsel re problem with same .5; email to JG re airport issue .1;	5.5	
4/5: Emails to JG re settlement and airport .1; emails to and from LO counsel re City of LA issues .3; call and email to client re same .3;	.7	
4/6: Email to client re settlement .1;	.1	
4/7: Review revised judgment .5; many emails with LO counsel re settlement issues .4	.9	
4/8: Email to LO counsel re settlement .2; call with RGK re AGWA .4; call with MF re settlement .3; many calls with LO counsel re settlement issues and AGWA troubles 1.7; calls and emails to BB and CS re same .1;	2.7	
4/9: Call with BB re AGWA and memo to file .3; call with CS re same and review notes on prior settlement positions .6; call with SK re AGWA and settlement issues, memo to DO re status .5; review and analysis of SK comments to past draft .3; brief review of revised draft changes .2; email to counsel re Willis position .3; emails to and from BB re settlement .3; review Kuney comments to judgment .3; emails to and from CM Putnam .1; email to LO counsel re Phelan .2; emails to and from SK re AGWA water .1;	3.2	
4/10: Email to BB and CS re water contribution .2; status email to MF re same .1; review and analysis of latest draft of stipulation .9; email to WM re Phelan claim analysis .3; travel to and attend settlement conference and brief meeting with LO counsel after 9.8;	11.3	
4/11: Email to BB and CS re AGWA .2; email to LO counsel re AGWA .2; prepare and revise email to LO counsel re handling AGWA .3; call with RGK re AGWA, memo to file .3; email to LO re same .1; draft long letter to MF re settlement issues, research for same 1.2; emails to and from LO counsel re changes to same .3; email to MF re status .1; call from RK re further changes .1; review of RGK minutes and email to LO counsel .2; review Edwards data .1;	3.1	
4/12: Review and analysis of Rosamond Annex, check court docket for party status, and cross reference with class list .9; email to LO counsel re same .2; review and analysis of latest draft judgment and task list .7; call with MF re settlement issues, memo to file .3; email to and from same re settlement .2; email to RGK re Annex .1;	2.4	
4/13: Email to LO counsel re Annex .1; status email to BB re AGWA discussions .3	.4	

4/14: Participate in Rosamond Annex conf call, memo to file .6; review Kuney letter and email re comments to same .2; all with BB and MF re AGWA issues .5; call from WW and EG re settlement issues, memo to file re same .6; email to LO counsel re status of settlement issues .2;	2.1	
4/15: Analysis of class cert issues and preparation of timeline .5; email to counsel re same .1; conf with DO re status of settlement .2; review of new Willis language and several emails to and from LO counsel re same .4; emails to and from WW re settlement .2; email to RGK re same .2; review Phelan letter and email to SK re same .1; email to JD re Annex defendants .1; emails to and from RGK .1; emails to and from counsel re handling Phelan .1;	2	
4/16: Emails to and from Dubois re settlement .1; review and revise Phelan letter .2; phone call from potential CM Phil Barone .4; emails to and from counsel re handling Phelan .2; emails to and from BB re AGWA .1;	1.0	
4/17: Emails to and from client and call with same re settlement issues .4; emails with WS and RGK re Blum .1; review and revise judgment draft, email to JD re same .7; emails to and from SK re Phelan .1; emails with CM Wada .2; emails to and from JD and LL re judgment .3; emails to and from RWalker re class inclusion .1;	1.9	
4/18: Emails to and from JD and revise SP language for judgment .5;	.5	
4/21: Call from client re settlement issues .4; emails to and from RZ re Blum trust .1; review and analysis of Bolthouse records and emails to and from RZ re Blum lease .6;	1.1	
4/22: Prepare Rosamond agreement and email to DE re same 1.0; emails to and from DO and DE re Rosamond .1;	1.1	
4/23: Emails to and from WW and DO re fees .1;	.1	
4/24: Emails to and from client .1; review revised Phelan proposal .2; emails to and from SK re same .1	.4	
4/25: Emails to and from JD and DO re handling fees .3; Emails to and from counsel re Phelan .1;	.4	
4/26: Review and analysis re Bolthouse settlement agreement with Blum .2;	.2	
4/28: Review and analysis re revised judgment .4; emails to client re same .1; review DE comments to agreement .1;	.6	
4/29: Emails to and from LL and LO counsel re settlement .2;	.2	
4/30: Review draft settlement exhibits .1	.1	
TOTAL ATTORNEY HOURS	65.7	
TOTAL PARALEGAL HOURS		



# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: May 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
5/1: Emails with Cardno on billing .1; review Evertz draft agreement, analysis re class notice billing, revise agreement, and email to DE re same .6; emails with CM Wada .1;	.8	
5/2: Emails with DE re payments .1; review new judgment language from RZ .3;	.4	
5/4: Emails with DE re Rosamond .4;	.4	
5/5: Emails with counsel re settlement issues .2;	.2	
5/6: Emails with DE re Rosamond .2; phone conf with counsel re settlement .5	.7	
5/7: Emails and call with CM Rogers re settlement status and issues .5; emails with DE re Rosamond deal .1; phone call from CM Wada .3;	.9	
5/9: Call with Barone re lawsuit and settlement issues .6; review emails re settlement , emails with WW .1; review and execute Rosamond agreement .1;	.8	
5/12: Phone call with CM Rogers re settlement issues .4; emails with DE .1; phone call from CM Maldini re settlement and class membership issues .4	.9	
5/13: Emails with JD re settlement .1; review Bartz exhibits .2; review of new draft judgment and exhibits .8	1.1	
5/14: Emails with client re settlement issues .3; emails with counsel re settlement .3	.6	
5/15: Emails with WS re fees .1; attend settlement meeting conference call 1.8	1.9	
5/16: Emails with counsel re settlement issues and SP language .5; analysis of AV mutual numbers and discovery documents supporting same .8; review revised judgment and exhibits .5;	1.8	
5/19: Phone call from CM Smith and Barone re settlement issues .4; analysis and research re solar entity Recurrent and email to LO counsel re same .7; emails with DO re CM issues and fees .2; review Willis SC statement .1; phone call from BofA re CM parcel and litigation .4;	1.8	

<b>5/23: Review status conf stmts .1; attend status conference, memo to file .4; review of revised judgment .4; review of Cardno invoice .1; emails with LO counsel re settlement .2;</b>	<b>1.2</b>	
<b>5/26: Emails with DO .1</b>	<b>.1</b>	
<b>5/27: Emails with LO counsel and WW re settlement .2</b>	<b>.2</b>	
<b>5/28: Emails with LO counsel re settlement .2; emails with US re SP class numbers .1;</b>	<b>.3</b>	
<b>5/29: Prepare for LO conf call on settlement issues and attend same, memo to file 1.1</b>	<b>1.1</b>	
<b>5/30: Phone call from CM Dunn re settlement issues .4;</b>	<b>.4</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>15.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>0</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: June 2014

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
6/2: Phone call from CM Marios re settlement .3;	.3	
6/6: Return phone calls from two CMs re settlement and membership issues .5; emails with counsel on settlement issues .1; review and analysis of JD email and draft stipulation, and revised judgment, prepare comments to same 1.0	1.6	
6/9: Review changes to judgment and emails of counsel re same .1; phone call with RGK re settlement .4;	.5	
6/10: Email to LO counsel re settlement issues .3; emails with RGK .1;	.4	
6/11: Emails and call with client re settlement issues .5; emails with LO counsel re settlement .2; emails with CM Barrone re settlement .1;	.8	
6/12: Emails with CM B Smith re settlement .2; emails with administrator and PWS re invoice issues .2; analysis re fees and costs, call with DO re same, and preparation of demand letter re same .9; emails with LO counsel and WW re fees .1; review SK revisions to draft stip .1; review Blum letter and new Roe amendments, cf class list .2; review RZ changes to stip, call to same .2; emails and calls from CM Ellis re settlement issues .5; phone conf with LO counsel re settlement, review further revised stipulation .8	3.2	
6/13: Many emails with LO counsel re stip, review revised version of same and comments on changes .5;	.5	
6/14: Review further revised stip and SK email re same .1; email with LO counsel re settlement and class fees .2;	.3	
6/20: Review RZ email on Blum .1; emails with AV hidedert press re adjudication and settlement issues .4; review Blum corr, email to client .1; email to RGK re settlement n/c	.6	
6/21: Review Chodos opinion and email to DO re same .3;	.3	
6/23: Emails with DE and administrator .1; review LO emails re stip .1; emails with JD re class numbers .1;	.3	
6/24: Review Milliband letter, Bunn letter, emails from LO counsel re settlement .1; emails to DE and MD .1	.2	

6/25: Emails with JD and call and emails with Entrix .2;	.2	
6/26: Emails with DO and DE .1	.1	
6/27: Emails with Rosamond .1; phone call with DE et al, memo to file, analysis re class issues and email to same .4; review and analysis of revised judgment .3;	.8	
6/30: Email with DE and R CSD re payment issues .2; review Zimmer letters .1	.3	
TOTAL ATTORNEY HOURS	10.4	
TOTAL PARALEGAL HOURS		0

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: July 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/1: Analysis re new Roe parties and email to LO counsel re handling in settlement .3; emails with settling counsel re meeting .1; emails with BB re PWS and settlement .1; emails with DO re settlement issues .4;	.9	
7/2: Emails with LO counsel re settlement issues .3; emails with WW re settlement .1; review and analysis of new Roes .3; review of emails on watermaster issues .1; phone calls with LO counsel re settlement .3	1.1	
7/6: Review emails re settlement call .1;	.1	
7/7: Review and analysis of class list issues, membership status, orders and email to Dubois re status 1.8; review and analysis of current stip and proposed judgment .5; attention to settlement accounting issues and emails with DE et al re same .2; analysis of new Roe defendants .4; review of Annex list, court records, and emails with counsel on handling settlement of same .6	3.5	
7/8: Prepare for settlement call .2; participate in settlement conf call 2.1; memo to file re same .2; review of revised stip .1; emails with counsel re handling Annex parties .2; review and sign DE forms and emails with same .1; emails and call with CM Davis re rejoining and settlement terms .5; review CMC stmts and corr of this date .2; email to BB re water master provision and AVEK board .1; review draft CMC stmt from US, emails to LL re same .1; many (15+)emails with counsel re changes to joint statement .2;	4.0	
7/9: Review new drafts of judgment and stip, and exhibit portfolio, prepare memo re same 1.0; review Zimmer response to non-stipulators, emails re same .1;	1.1	
7/10 Review and analysis of RGK Roe list and compare with class list, email to LO counsel re same .6; emails with counsel re settlement issues .2; : Settlement conf call, and memo to file re same 2.0; review amended new Roe list	2.8	
7/21: Review MO from 7/11 and call to DO .1; return phone calls to three class members re settlement issues .7; review and analysis of John U mutual list .1; review and markup of Kuney memo and new section 5.5 .4;	1.3	

7/22: Phone call and emails with CM Sevilla re settlement and transfer issues .5; emails with counsel re settlement and Willis .2; phone call and emails with CM Schuder .1;	.8	
7/23: Emails with liaison comm and LO counsel .1; emails with BB re watermaster impasse .1; many emails with counsel re settlement and watermaster issues, revise language .5;	.7	
7/24: Many emails with settling counsel .3; call from SB re settlement .4; phone call to client re settlement issues .4; emails with DE re Rosamond .1; phone call from CM Parker .5; email with Reesdale Mutual .1; phone call from atty Pandolfi re Shelton .3;	2.1	
7/25: Call with Reesdale re adjudication issues .3; emails with DO .1; emails with CM Sevilla .1;	.5	
7/27: Emails with RGK re settlement .1;	.1	
7/28: Phone call with class member Shuder re membership and water right issues .6; review and analysis re public records re same .2; prepare inclusion form .2; email to same re handling .1; call with RK re settlement, memo to file .4; email to RGK re same .1; emails to LO counsel re settlement .2; call from JD re AVEK meeting .1; call from Class member Ellis re membership .5; emails to client re settlement meeting .2; analysis re Carrle and Harvey properties and emails and call with Harvey .5; calls and emails with CM Ellis .3; prepare inclusion forms for Putnam and email to same .3; emails with RK re settlement .1; emails with client re settlement issues .2;	4.0	
7/29: Call with client re settlement and trial issues .6; emails with RK re settlement .1; review and analysis of new judgment, stip and exhibits, markup of same for meeting .9; email to client re issues with same .2; emails with SK re settlement .1;	1.9	
7/30: Review client notes on meeting .1; travel to and attend liason comm and settlement meeting at BBK 7.5; emails with CM Ellis .1; review revised judgment .3; review Blum letter n/c; emails with CM Davis re settlement .1;	8.1	
7/31: Phone call with RGK re settlement .2; phone call with RK re Willis issues .6; call with RGK re settlement, memo to file .3; emails to RZ re Blum claim .1; review and analysis of Dubois summary email and changes to Judgment .1;	1.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>34.3</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>0</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Phone 310.954.8271 Fax 310.954.8271

DATE: August 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
8/1: Emails with counsel re JD changes .1; phone call from Pandolfi re CM Shelton .5; prepare Shelton claim forms, emails with Pandolfi .3; draft email to JD, emails with DO re same, revise and send to DO .2; emails with RGK re same .1; emails with CM Cevilla and call to same re questions .4; prepare CM Ellis inclusion forms and emails with same .3; review letter from Blum and emails with LO counsel re same .2; review and analysis of revised judgment, stip and exhibits, cf. with MM notes .6; public records search on Sevilla property .3; review Sevilla deed and emails with same re inclusion, review and analysis of ownership history, and signed claim forms .3;	3.3	
8/2: Emails with RZ and Sevilla .1; prepare memo summarizing changes to judgment, email to LO counsel .4;	.5	
8/4: Review Kuney judgment changes summary, cf. with MM notes .3;	.3	
8/5: Emails with CM Davis re settlement .2; review Willis CMC stmt .1; call from RGK .5; review emails with Rusinek n/c	.8	
8/7: Emails to and from counsel re settlement issues .4; phone calls to landowner counsel re same .3; review draft joint CMC stmt and comments to same, emails with counsel re issues .3; review new party answers and Phelan CMC stmt and CMO .1; review hearing transcripts on fees issues, and prior orders .4; call with SK re settlement .5; emails with Dunn re CMC .1; long email to LO counsel re CMC handling and settlement issues .4; phone call from RZ re settlement and CMC .5; review clean draft judgment and exhibits, and stip 4;	3.4	
8/8: Prepare CMC statement .3; call with RGK .4; emails to and from WM .1; prepare ex parte application, MM decl., and proposed order re class list 1.1; review other CMC statements and many (15+) emails with LO counsel re same .4; review hearing transcripts, prepare and revise supplemental CMC statement, emails with LO counsel re draft of same 1.1; phone call from J Lewis re Warnack .2; emails with CM Davis .1; emails with LO counsel re CMC and review US CMC .1; phone call from CM Maldini .3	4.1	
8/11: Travel to and attend meeting with client, status conference, and meeting of counsel re settlement issues 10.0; emails with RK re settlement .1	10.1	

8/12: Emails with WW re settlement issues .1; travel to and attend hearings and conferences with counsel 3.9; review letter from Holmes, and file re Ehyabide issues, email to same .4; emails with RGK re settlement .1; phone call from attorney Fetshans re class issues, memo to file .4	4.9	
8/13: Emails to and from J Lewis and attention to analysis re Warnack issue, email to settlement group .5; email to LL re change to Ex. 4 .1; return phone calls to three CMs, update master client contact memo re same .9; emails with RGK re settlement status .1; review minute orders and emails with CMs re same .1; analysis re AV Materials dismissal, emails with RGK .2; emails with TB n/c	1.9	
8/14: Phone call with CM Davis, prepare modified inclusion form and emails with same re form .5; email to settling counsel re Wilson and AV Mobile, call to Wilson re settlement .6; emails with RWalker re hearing .1; emails with counsel re Annex and class membership .2; emails with DE re settlement status .1; email with Wilson re settlement .1; phone call with JD, memo to file and emails with PWS re judgment terms final, email to DO re status .3; prepare ex parte and MM decl re CM list changes .5;	2.4	
8/15: Prepare for and attend hearing, memo to file re same .5; emails with CM Davis .1; phone all from Wilson re settlement and class issues .6;	1.2	
8/19: Email from Wilson re settlement .1; review new judgment language, emails with JD re fees .2	.3	
8/20: Emails with Cardno re billing .1; emails with PWS re settlement .1; analysis re expert billing and approval, emails with PWS re expert billing issues .4; emails with Maline re same .1; emails with KS and JD re fees issue .1; emails with JD and DO re settlement call .1; emails with LO counsel re settlement issues .2;	1.1	
8/24: Emails with CM Ellis .1;	.1	
8/25: Review new settlement language and emails to counsel .1; emails and call with client re same .4; call with RGK re watermaster provisions, memo to file .6; emails with CM Ellis .1; many emails with counsel re watermaster provisions and changes to J .4; emails with CM Shuder .1; emails with LO counsel re West Valley claim .1; review Phelan filings of this date .1; emails with client re changes to watermaster provisions .1;	2.0	
8/26: Call with client re watermaster and settlement issues .5; call with RGK re same .3; call and many emails with W Wilson re class membership and settlement .6; email to client re new settlement language .2; emails with JD n/c; email to CM Pandolfi .1;	1.7	
8/27: Emails with Wilson re class inclusion issues .2; email to settling counsel re watermaster board .1;	.3	
8/28: Emails with LO counsel re watermaster .2; review filings by Phelan and emails with Dunn .1;	.3	
8/29: Attend telephonic status conf, memo to file .7; analysis re fees and email to JD re resolution .2; emails with Reddix .1; return phone calls from two CMs .5	1.5	
8/30: Emails with Pandolfi re Hill Trust .1;	.1	



TOTAL ATTORNEY HOURS	40.3	
TOTAL PARALEGAL HOURS		0

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, California  
Phone 310.954.8271 Fax 310.954.8271

DATE: September 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/1: Emails with DO .1; email to LO counsel re settlement issues .2; email to RK .2; email to JD re meeting n/c	.5	
9/2: Phone call from Cardno re billing .1; email to RWalker re ex parte .1; review court notice n/c; email to DO re hearings and settlement .1; email to client re status conf .1;	.4	
9/3: Call with JD re settlement, memo to file .4; call with RZ re same .4; call with RGK re settlement .3; prepare status conf stmt .3; review CM Moore filings and email with DO re hearings .1; analysis re fees and costs and prepare settlement proposal re same .8; emails from BB and JD re settlement .1; email to BB and CMS re settlement 1; emails with Wilson and Fife re settlement .2; emails with DO re settlement .1; prepare status conf statement .3; review Milana filing and emails with LO counsel re Annex issues .2; email to CM Olaf re Moore .1; prepare ex parte app re class list, call to CM re same .3;	3.7	
9/4: Call with DE re Annex, memo to file .2; conf call with LO counsel re settlement .7; phone call from Cardno re billing .1; analysis re billing and evidence, prepare ex parte app and decl of MM re expert unpaid billing .7; emails with WM re expert bills .1; review Tapia ex parte papers and Phelan statement .1;	1.9	
9/5: Attend status conference, memo to file re same .9; email from TB re expert n/c; phone call from CM Johnson re settlement and class issues, supplement master client memo re same .5;	1.4	
9/7: Email to W Wilson re class admittance .2;	.2	
9/8: Emails from TB and Wilson, phone call from Wilson .2;	.2	
9/9: Travel to and attend settlement meeting at BBK, call with RGK and BJ 6.6; review filings of this date re trial .2;	6.8	
9/10: Phone call with WWilson, memo to file .5; emails with Cardno re payment status .1; emails with DE re settlement .1; emails with TB re same .1; phone call with Maline and emails with same .2; email to JD re payment of expert bills .2; analysis of BBK accounting and emails with Maline .3;	1.5	

9/11: Emails to and from Wilson re class issues .3; many emails with Cardno and PWS counsel re expert billing issues, analysis re same .7; return phone calls from two CMs .5;	1.5	
9/15: Emails with PWS counsel re Cardno .1; review D40 filings .1; emails and call with CM Rodgers re settlement .4; phone call from CM Basner .5	1.1	
9/17: Phone all form Maline .1; review and analysis of SK email re timing and strategy issues, revise same .2;	.3	
9/18: Emails with Wilson .1; phone call from Thompson .1;	.2	
9/19: Emails with SK re settlement .1; email to JD and MF re Thompson .1; emails with TT and RWalker re expert firm change .1; review Willis and Tapia filings .1; prepare for settlement call .2;	.6	
9/22: Participate in settlement call, memo to file re same 1.2; review Phelan filing n/c	1.2	
9/23: Email to Thompson .1;	.1	
9/24: Email to JD .1; call with JD et al re settlement, memo to file .7; phone calls and emails to and from numerous LO counsel re settlement .3; legal research on case law in favor of fee determination prior to final approval 1.4; draft and revise email to all counsel re same .5; phone call with RGK and WS re fees and settlement, memo to file .6; review D40 CMC stmt and email re same .1; review prior expert orders and prepare ex parte re GSI change, email to TT re declaration .7; emails with CM Rodgers re status .1; analysis re new zoning changes impact on judgment provisions re same .7; legal research on fee allocation and email to LO counsel re same .6; review Phelan filings and D40 draft CMC stmt .1;	5.9	
9/25: Finalize ex parte and prepare order .2; call with DO re case status and hearing .6; phone call with SK re settlement, memo to file .4; review WM letter and emails to and from same .2; phone call with RGK and BJ re settlement and class issues, memo to file .7; emails with DO .1;	2.2	
9/26: Emails to and from LO counsel re fee issues .3; call with DO re status .4; phone call with LO counsel .5; emails with Cardno re unpaid bills .1; review AVEK letter and Tapia and Wilson filings .1;	1.4	
9/29: Emails with Cardno .1; emails with DO re settlement .1; review of AB 2507 and emails with DO and client re same .4	.6	
9/30: Review MO and call to client .1; emails with TB and RGK re class language .2; emails with WM re Williams depo and trial issues .2;	.5	
TOTAL ATTORNEY HOURS	32.2	
TOTAL PARALEGAL HOURS		0

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: October 2014

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/1: Call to RK .1; review and analysis of file materials, evidence, and Williams transcript re Phelan trial issues of concern 1.1; call with WM re same, memo to file .3;	1.5	
10/2: Emails with DO re scheduling issues .1; emails with WM re Williams .1;	.2	
10/5: Phone call from CM Landsgaard .4; emails to and from same .1; emails and call with client re settlement .3; email to JD re settlement .1;	.9	
10/6: Email to DO re Phelan trial .1; review and analysis of Blum MSJ .4; call from client re AV press and review article on settlement .3; emails to and from DO re hearing issues .2; emails to and from CM Lee re class joinder .2; call from Lee re lawsuit .5; review Phelan trial exhibits .5;	2.2	
10/8: Phone calls from two class members re settlement and lawsuit issues .7; emails to and from DO .2;	.9	
10/9: Analysis re Cardno billing issues, emails to and from counsel re same .3; review Phelan stip .1; emails to and from JD re meeting on settlement .1; review pending settlement issues list and supplement same .1;	.6	
10/10: Attend court status conference, memo to file .3; attend settlement group conference call 2.5; review CMO and emails to and from counsel re handling many settlement issues .7; emails to and from Cardno re billing .1; emails to and from TB re same .1;	3.7	
10/11: Status emails with client .2; review latest draft of judgment .4; emails with LO counsel re settlement .2; emails to and from RK re motion, and review same .2;	1.0	
10/12: Emails to and from WM re Phelan trial .2; emails with RK re motion to add Church .1;	.3	
10/13: Review and analysis of judgment exhibits .3; emails to and from counsel re settlement issues .3; emails with Cardno re billing, analysis re PWS matrix .3; emails to and from RGK re Willis .2; emails and call from MF re class issues .2; email to PWS counsel re Cardno billing .3; emails to counsel re CMO .1;	1.7	

<b>10/14: Emails to and from PWS counsel re Cardno payments .2; emails to and from Tapia counsel .3; email to and from counsel re CMO .2; review Blum declaration .1;</b>	<b>.8</b>	
<b>10/15: Emails with DE re Cardno, review depo notices .1</b>	<b>.1</b>	
<b>10/17: Many emails with counsel re CMO and call, review revised CMO .5; phone call with counsel re settlement and memo to file re same .7; review and revise CMO .3; emails with CM Munz .2;</b>	<b>1.7</b>	
<b>10/19: Review judgment and email to JD .1;</b>	<b>.1</b>	
<b>10/20: Emails with counsel re CMO .4; review same .1; commence revisions to judgment .5</b>	<b>1.0</b>	
<b>10/22: Emails and call with WM re expert billing .4; review PWS opp to AV mobile motion, call to Wilson .2;</b>	<b>.6</b>	
<b>10/23: Prepare revisions to Judgment and email to counsel re same 1.1; email to TT re various matters .4; emails to and from Cardno and attention to billing issues .2;</b>	<b>1.7</b>	
<b>10/24: Emails to and from counsel and Cardno re billing .2; review court orders .1; phone call from RK re CMO and settlement, memo to file .6; email to counsel re same .1;</b>	<b>1.0</b>	
<b>10/25: Phone call with client re settlement .3</b>	<b>.3</b>	
<b>10/26: Emails with client re settlement .1;</b>	<b>.1</b>	
<b>10/27: Emails with counsel re incentive award .3; review of client time and cost records and call with same .2; emails to and from CM Sevilla .2; email with counsel re settlement .1;</b>	<b>.8</b>	
<b>10/28: Review filings of this day .1;</b>	<b>.1</b>	
<b>10/30: Emails and call with RK re settlement and CMO .4; review filings of today .1;</b>	<b>.5</b>	
<b>10/31: Review revised stip .1; call and emails with Wilson .2; emails with RK re CMO and review opp to same .1; review trial briefs and Phelan motions .5; review revised judgment language and emails with counsel re same .2;</b>	<b>1.1</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>22.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: November 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/2: Phone call with client re settlement .1;	.1	
11/3: Review SK comments to judgment, redraft Wood section, email to counsel re changes .8; emails and call to client .2; revise Judgment re RAL incentive, review client corr re time and expense, and email to counsel re same .6; many emails to and from DO and client re settlement issues for class 1.1; review revised judgment, and emails to counsel re further changes .4; emails to and from counsel re changes to SP section of same .3; review filings of today .1; emails with counsel re settlement meeting .2;	3.7	
11/4: Review D40 Phelan exhibits .3; emails to and from SK re judgment changes .1; call with Walter Wilson and memo to file .2; travel to and attend CMC and related hearings 3.8; meeting with client re settlement .4; email to counsel re handling AV Mobile, and analysis re same .2;	5.0	
11/5: Emails with counsel re AV Mobile .3; emails with client re transfer provisions, review judgment and analysis re same .4; review revised judgment and email to counsel re further changes .4;	1.1	
11/6: Review and analysis re judgment exhibits and emails to and from counsel re same .7	.7	
11/7: Review new judgment, revise same, and emails with counsel re changes 1.2; emails with client re same .2; email to SK re drought provision .1;	1.5	
11/8: Review emails from counsel re settlement .1;	.1	
11/9: Emails with counsel re judgment changes .2;	.2	

11/10: Emails with counsel re judgment .1; email to TT re expert order .1; legal research re finality of appeal and impacts CMO procedures on same .8; review and analysis of Judgment and long email to counsel re issues 1.9; call with SK re settlement issues .2; call with RGK re settlement issues 1.2; emails to and from BB re Willis .1; emails with RGK and TB re settlement .2; emails to RK re Willis .2; emails with JD re Willis judgment .1; review Phelan stip of fact .1; emails with counsel re settlement issues .2; review and analysis of Willis language and long email to counsel re handling same, and impact on LO parties .8; emails with counsel re meeting .1; many emails with counsel re judgment issues .3; emails with JD re handling Lane dispute .3; review of revised judgment and exhibits .7; review and analysis re record and long email to RWalker re class approval order .3; email to EG re judgment changes .2;	7.9	
11/11: Review client time summary and emails with same .2; emails to and from liason group re call .1; review and analysis of CM Dunn records, emails to TT re same .2;	.5	
11/12: Call with WM re trial and settlement issues, memo to file .6; review court orders .1; emails to and from client re settlement .2; review judgment exhibits .2; review Rusinek changes to stip .1;	1.2	
11/13: Review of settlement comments .2; emails to counsel re same .1; attend settlement conf call with counsel 2.8; email to client re status of same .3; review of record and long email to RWalker re class settlement approval order .6; call from CM Landsgaard .2; emails with same re Rosamond CSD .2; review RGK judgment questions and emails with counsel re same .2; email to JD re incentive payment .2; review revised judgment language .2; review Rusinek changes to judgment .1;	5.1	
11/14: Analysis of Lane dispute and emails with counsel re same .6; emails to and from TC re same .2; emails to DO re settlement .2; emails with MF re settlement .1; email to JD re Lane dispute .3;	1.4	
11/17: Review BB comments to judgment .1; emails to and from counsel re changes to judgment .1; call from Renwick re DM Douglass and analysis to status of same .2; email to same re same .3; email to same and WW re handling .2; review new comments to judgment, and detailed review of full document 1.1; review of stipulation .1; email to JD re edits .1; review WW further comments and email re additional changes .5; further review of definitions, monitoring and new Willis language, email to JD re changes .5; review Phelan SoD .1;	3.3	
11/18: Review many emails re changes to judgment and emails with JD .2; review of latest full version and redlines of same, emails to and from JD re changes .7; emails and call with client re settlement issues .5; review judgment exhibits .2; emails with JD re Granite .1; phone call with RGK and Taylor re handling of dispute, memo to file .6; review Armstrong case re correlative rights prove up .3; long email to US re position on Granite/Lane dispute .4; many emails to and from M Kruells re class membership, research re property history .8; prepare inclusion forms for same .1; review and analysis of EG new use changes and emails to and from EG and numerous parties re same .6; emails to and from DE re judgment .1;	4.6	
11/19: Review new draft of stip and judgment .5; many emails to and from counsel re same .3; emails with JGK re Lane dispute .4;	1.2	

11/20: Review and analysis of judgment and many (30+) emails with counsel re Phelan and other provisions .7;	.7	
11/21: Email to counsel re Phelan language .2; emails with JD re settlement procedure .3; review RK letter and email to DO re same.1; emails with RGK re Lane dispute .2; review original exhibit 4 and analysis re same .2; participate in settlement conference call, memo to file 3.1; phone call with RGK re Granite dispute .2; review and analysis of settlement records and preparation of long email to TC re handling of Ex 4 issues 1.5; review and analysis of notice provisions in settlements, prepare redline memo or relevant provisions, and email to counsel re changes and issues 1.1; review expert demands, analysis re experts needed, email to client re same .4; research on potential appraisal experts .8; email to CS and JG re Lane dispute .2;	8.3	
11/22: Emails to and from client re settlement issues .2; email to counsel re further judgment change .3; email to US re Lane dispute .2; emails with EG re judgment .1; legal research and email to TC re Lane dispute and litigating Exhibit 4 .6; many emails with counsel re handling Lane issues .3;	1.7	
11/24: Phone call with RZ re settlement issues, memo to file .5; emails with US re judgment .2; emails with RGK re Lane .1; email to counsel re same .2;	1.0	
11/25: Emails with HGK re Lane .1; emails with RGK re Lane .2; participate in settlement conf call, memo to file/DO re same 1.2; review and revise notice language and email to JD and TB re same .3;	1.8	
11/28: Receive and review new stip and judgment, emails with DO re issues .8	.8	
<b>TOTAL ATTORNEY HOURS</b>	<b>51.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>0</b>



# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: December 2014

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
12/1: Review and analysis re appellate language, email to DO and draft email to JD re stip issues .7; emails with counsel re stipulation .3; review stip and further comments to counsel .2;	1.2	
12/2: Review Tapia decl .1; receive and review final judgment and stip .5; emails with client re same .2; email to JD re changes to judgment .1; emails with RGK re Lane .1; analysis re handling Willis and long email to counsel re strategy for same 1.0;	2.0	
12/3: Call with CM Barry Munz .6; emails to and from client re settlement .2; emails with client re procedure on settlement, research re same .5; review Levy decision and email to MD Re same .4; emails with DO re same .1; emails with B Munz re problems with judgment .4; analysis re shared well problem and long email to counsel re handling same .7; prepare revisions to judgment and emails with counsel re same .4;	3.3	
12/4: Emails ton and from CM Munz re settlement and shared well issues .3; email to and from counsel re shared well language .4; email to all counsel re revised judgment .2; email to client re same .1;	1.0	
12/5: Emails with DO re settlement .1; emails with counsel re changes to judgment .2; emails and call with Maline re expert billing, analysis re same .2; review revised settlement document and exhibits .6; email to client re same .2;	1.3	
12/6: Emails with client re settlement issues .6; call with same .2; email to Cardno re billing .1; email to DO re fee motion and settlement handling strategy .4; review Phelan filings of this day.1;	1.4	
12/8: Review emails from counsel re settlement .1; review Blum motion filings .2;	.3	
12/9: Emails with counsel re settlement .3; review revised judgment .2; emails with client re same .2; emails with JD re signature issues .2;	.9	

12/10: Emails with MF and RGK re Ex 3 issues .2; emails with JD re same .1; review and analysis of judgment provisions in light of Ex rampdown numbers issues .4; phone call from RGK re same and handling, memo to file .6; many (50+) emails with counsel re Ex 3 issues .9; emails to and from client re same and other exhibit issues .2; emails with JD re section 8.3 .2; email to DO re status of Ex 3 .1; review and assessment of Exhibit 1, and emails to and from AH re means of identifying class defaults .3; meeting with JC re class list issues .1; emails to TB re Ex 3 .2; emails with client re settlement .1; emails to DO re settlement issues .2; emails with LO counsel re settlement issues .3; review new judgment exhibit binder .2; long email to CM Munz re settlement issues .5;	4.6	
12/10: Review of Exhibit 1 and class list for identification of erroneous defaults JC	0	6.1
12/11: Review of Exhibit 1 and class list for identification of erroneous defaults JC	0	7.5
12/11: Emails with counsel re settlement .1	.1	
12/16: Review minute order and emails from counsel re settlement .2; review opposition and reply papers for Willis motion .2;	.4	
12/11: Review of Exhibit 1 and class list for identification of erroneous defaults JC	0	3.5
12/17: Review Tapia history and filings .2; emails to and from JD re handling same .2; emails to and from LO counsel re allocation issues for Tapia .3; review Blum reply .1; emails with DO on settlement .2;	1.0	
12/18: Emails with counsel re settlement procedure .3;	.3	
12/19: Review further revised stip, judgment and exhibits .6; review court filings of today .1; emails to and from counsel re settlement timing .2;	.9	
12/22: Many (35+) emails with counsel re handling Jan 7 hearing and objections, and settlement issue .4; email to counsel re Willis .1; emails to RK re settlement .2; email to SK and RK re Willis strategy .2;	.9	
12/23: Many emails (25+) with counsel re Willis and Tapia .4; conf call with settling counsel, memo to file 1.3; call to RK .1;	1.8	
12/24: Email to RK re settlement .1; emails with counsel re Willis .1; review and sign CMC stmt .1;	.3	
12/29: Emails with SK re CMC .1;	.1	
12/30: Emails to and from J Lewis and JD re Warnack, review file on class status .2; attention to drafting small pumper class settlement agreement 2.7	2.9	
12/31: Review Lane status conference stmt .1; email to all counsel re settlement .2; long email to JD re Willis strategy .7; call to RGK re settlement issues .3; email with same re Lane .2; review and analysis of settlement provisions on re disputes .2; continue drafting small pumper settlement agreement 1.3; email to counsel re same .1; emails with counsel re Lane issues .3	3.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>28</b>	

TOTAL PARALEGAL HOURS		17.1
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# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: January 2015

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
1/2: Email from DO re changes to settlement agreement .1;	.1	
1/4: Attention to review of 2014 timesheets (April – Dec.), review relevant time notes and make correction notes 4.1; email to AH re work on same .2; return phone calls to four CMs re settlement, update client contact memo re same .9	5.2	
1/5: Prepare case management conference statement draft, analysis of filings relevant to same .9; attention to review an correction of timesheets from late 2013 through March of 2014, review relevant time notes 2.3; emails with DO re fees and costs issues .2; emails with D40 re fees and costs .2; review CMC statements .1; research and analysis re current market rates, email to DO re same .8;	4.5	
1/6: Complete case management conference statement and declaration of MM .7; prepare notice of change of address .1; email to counsel re depo of RK clients .1; legal research on Estrada parcels, review assessor files and images, email to WW re same .7; phone call form CM Putnam .3; email to Putnam re inclusion .1;	2.0	
1/6: Review and correction of timesheets (Oct 2013 – April 2014), summary memo to MM re same 3.5 AH	0	3.5
1/7: Emails to and from JD re CMO .2; emails to and from RGK re Lane issues .2; participate in status conference .7; emails to and from Brumfeld re Tapia .2; phone call from RGK re Lane and Willis .3; many emails to and from RK re Estrada deposition .5; legal research on class rep substitution standards 1.6; email to CM Putnam .1; analysis of Annex parties and emails with DE and counsel re same .5; analysis of Archdiocese property and public records re same, emails with D40 re same .6; email to settling counsel re settlement issues .1; phone call from CM Witt re settlement and membership issues .4;	5.4	
1/8: Emails with JD re CMO and settlement .2; legal research on adequacy and class rep conflicts, amendments to add class reps 3.1; emails with DO re Willis motion and conflicts .1; prepare opposition to Willis motion to add class rep, and declaration of MM 4.4; phone call with Jeff Dunn re settlement, memo to file .3; phone call from Juniper Hills class members .8; email to TB re Wildermuth search .1; review of Tapia decl and docket for filing history .1;	9.1	

1/9: Phone call from CM Janice Wise re adjudication and town council meeting .6; email to TB re property search for same .1; emails to and from WW re website .1; phone call from CM Chiodo re class issues, property record search re same .4; email to DO re file handling and expert data file management procedures .1; emails with Wise .1; email to TT re contact change n/c; review and analysis of CMO, revise and prepare email to settling counsel re new CMO .4; return phone calls to two CMs re settlement .5	2.3	
1/10: Revise CMO and email to counsel re same .1; emails and calls from counsel re CMO handling .5;	.6	
1/11: Attention to review of corrected timesheets (pre-April 2014) .6;	.6	
1/12: Call from JG re City timing, memo to file .2; revise CMO and email to counsel re same .2; emails with TB re settlement and class issues .2; receive and review final version of stipulation, judgment and exhibits, cf. against prior version and notes tracking changes, email to client re same 1.1; many emails (15+) with counsel re CMO .5; emails with Maline and call from same, email to Thompson re expert billing and motion .3; analysis re expert billing issues and further emails with Maline re same .3; email to PWS re nonpayment .1; many (20+) further emails with Cardno and PWS counsel re expert billing, review and analysis of records re same .6;	3.5	
1/13: Many emails (20+) with LO counsel re CMO .4; emails with Cardno and PWS counsel re payment .1; long email to LO counsel re settlement issues .3; email to client re settlement issues and timing .2; return phone calls from three CMs re settlement .6	1.6	
1/14: Emails with TB re settlement execution .1; emails with Alshire re payment .1; phone call from CM Landsgaard re settlement .5; review and analysis of fees and costs paperwork, and long email to Dunn re settlement of same .8; emails with JD re CMO .1; phone call from Mackey and emails with same re billing .1;	1.7	
1/15: Phone call from Bill Brunick re Sorsabal, memo to file .3; analysis re settlement issues and timing, long email to counsel re same .3; many emails with counsel on CMO, review and revise same .5; emails with two CMs re settlement .3; emails with RW re CMO revision and ex parte .1; many emails with counsel re CMO, review revisions to same, email to settling parties re same .6; email to DO re changes to SP settlement agreement .2; many (20+) emails with LO counsel re settlement strategy issues .8; emails with JD re motion for approval .1; revise SP settlement agreement and email to D40 .4; draft and revise ex parte re CMO amendment 1.0; emails with counsel re settlement issues .2; return calls to CM Edwards and Harden re settlement and lit issues .6;	5.4	
1/16: Emails with with RGK .1; emails with MF re Will and prove up .3; review RK reply filing .1; review dismissals, email with D40 re same .1; review flings of this date .1; analysis re expert billings and prepare ex parte re same .2; call from CM York re settlement issues .3;	1.2	
1/19: Review Willis filings and docket material and prepare and revise letter to RK re meet and confer on discovery dispute re Estrada 1.2;	1.2	

1/20: Review and analysis of Willis Class filings .3; review of conflict letter from Brunick re Dyas .1; emails with DO .1; emails with CM Sorsobol re settlement .2; prepare discovery conf statement and MM decl., revise same 1.6; emails with TT and review and analysis of Tolman, Bellanca and Banuk records .4; long email to LO counsel re prove up strategy issues and Willis .4; review Willis ex parte and email to LO counsel re same .1; many (20+) emails with LO counsel re hearing strategy issues .6;	3.8	
1/21: Conf call with LO counsel 1.5; prepare for hearings .9; phone call with Tom Bunn re hearings and settlement issues, memo to file .4; legal research for informal discovery conference re compelling Estrada depo 1.0; review tentatives and email to DO .1; prepare opp to Willis ex parte and revise same .6; email to LO counsel re hearing strategy .1;	4.6	
1/22: Travel to, prepare for hearings, and attend same, meeting with LO counsel in San Jose 9.9;	9.9	
1/23: Emails to and from RWalker .1; prepare proposed order on exert .1; long email to TThompson re status .6; phone call with Cardno re billing .2; phone call with client re status and settlement .3; email to client on status .2; emails with Maline re billing .1; review CMO and MO and email re calendaring .1; return phone calls to two CMs re settlement .2;	1.9	
1/24: Many emails with LO counsel re Willis and settlement issues .5; email to PWS re settlement .1;	.6	
1/26: Review Wildermuth report an calls to CM Wise and Witt re same .4; analysis of revisions to SoD .1;	.5	
1/27: Emails with counsel re settlement .1; phone call to client re settlement .2	.3	
1/29: Emails with CM Sorsabal .1; phone call with WM re settlement issues .6	.7	
<b>TOTAL ATTORNEY HOURS</b>	<b>66.7</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>3.5</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: February 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
2/2: Email and call with client re settlement .4; emails with JD and DO re settlement .2; review and revise SP class settlement agreement 1.0; email to counsel re same .1; emails to DO re settlement .2; emails with CM Wise .1; emails with BB and review of SP settlement terms re membership status and rights .5; email to KL re SP settlement .1;	2.6	
2/3: Emails with client re JH meeting .1; travel to and attend JH town council meeting re settlement and class membership and trial issues 4.5	4.6	
2/4: Phone call from CM Enger re settlement and membership .5; review Phelan SoD .1; emails with client re meeting and stip sign .2; emails with PWS re expert billing .1;	.9	
2/5: Phone call with DO re settlement issues .3; email to CM Wise about meeting .1; emails with client re settlement .1; phone call from CM Lewis re settlement and class issues .5;	1.0	
2/8: Modify SP agreement and email to PWS counsel re same .5; email and analysis re settlement issues .2;	.7	
2/9: Phone call with Tom Bunn, memo to file re same .5; phone call with Miliband re settlement and litigation issues .5; email to TB re settlement .1; email to LO re same .1; email to MD re settlement issues on signatures .1;	1.3	
2/10: Emails with WM re expert .1; email from RGK n/c	.1	
2/11: Emails with BB and WM re settlement .1; phone call from CM Sherman re settlement .4;	.5	
2/13: Phone call from CM Nadich .4; emails with Kratzer re expert payments, analysis re same .3; review Jan expert bill and long email to Mackey at GSI re lawsuit and billing handling .3;	1.0	
2/17: Calls to and from JG re settlement .1; phone call with Jim Dubois and call with Dunn re settlement .4; email to PWS counsel and analysis re settlement timing .1;	.6	

2/18: Review JD settlement comments and revise class settlement agreement 2.2; email to and from JD and DO re settlement .4; email to Dubois re settlement .1; email to LO counsel re settlement issues .2; emails with PWS counsel re timing and SP agreement .2;	3.1	
2/19: Many (40+) emails with counsel re settlement issues 1.3; analysis of signature list and emails with JD re handling of same .2; emails (15+) with WWilson re settlement .4; long email to settling parties re settlement problems .2; emails with TB name issues .1; emails with GSI re billing and payment .1; finalize SP agreement and email to PWS counsel re same .3; review final settlement exhibit binder .7; call from Lewis re Warnack and emails with JD re exhibit binder errors .1; analysis re Annex parties and long email to LO counsel re same and settlement issues status .5; email to J Lewis re Warnack .1;	4.0	
2/20: Emails with counsel re settlement issues .3; phone call to client re status .2;	.5	
2/21: Email with LO counsel re settlement issues .3; emails and call to client .2; emails with JD re signature status .1;	.6	
2/22: Analysis re handling late comers and emails with JD Re same .2	.2	
2/23: Conf with KD re master settlement tracking project .3; emails with JD re status .1; email to MD re signature issues .1; review of CM data and analysis re expert report data, review MM notes on and data summary re CM production estimates 1.0; phone call from LL and JD re settlement issues, memo to file re same .5; analysis re Ex 4 and long email to LO counsel re same .5; email to JD re LO problem .1; emails with LO counsel re settlement .3; conf calls with LO counsel, Dunn, re settlement issues and memo to file 2.3; phone calls and emails to several stipulating parties re settlement status .4; email to JD re prove up .2; email with Lewis re Warnack .1; phone call from CM Enger .2; long email to settling parties re class status and settlement .4; emails with TB re class issues .2; emails with WS re settlement .1; review of further signatures .1; emails with LO counsel re settlement .3; emails with JD re prove up and settlement .2; many (15+) emails re numerous parties re signatures and status .3; review of current tracking spreadsheet .1;	7.8	
2/23: Assist MM with review of settlement and preparation and editing of master signature spreadsheet and binder 1.6; KD	0	1.6
2/24: Emails with DE re settlement and Annex .2; analysis re Ex 4 party status and long email to LO counsel re same and handling non signatories .9; email to WW re Annex .1; call to Blum .1; many emails to and from LO counsel re handling Annex .5; call with RZ and RGK re Blum and Annex .6; conf call with LO counsel re handling various settlement issues, memo to file .8; emails to and from Weeks re signature .1; emails with US re status of issues .1; many (20+) emails with counsel re settlement .4; emails with Dunn re D40 .1; prepare draft email to all settling parties re status of non-signatories and Annex .4; emails with MF re AGWA status .1;	4.4	
2/24: Attention to settlement master signature spreadsheet and binder update .8; KD	0	.8



2/25: Call from Rich Zimmer .4; status email to settling parties .2; meeting with KD re master contact list project .2; phone call with DO .2; call to Davis .1; phone calls to and from JD, memo to file .3; review new signatures .1; many (15+) emails with LO counsel re Annex email and Ex 4 .5; meeting with KD re settlement signature and status issues .2; phone call with SK re Annex .2; call to DE re Annex n/c; revise Annex email and send same .3; phone call with DE, memo to file re same .4; phone call with KL re settlement issues, memo to file .5; many (40+) emails with counsel re settlement 1.2; phone call with Blum re settlement .4; phone call from Walter Wilson on settlement .3; email to LO counsel re AV Mobile and Desert Breeze negotiations .2; phone call with Wilson .2; emails with DE re Annex .1; emails with JD re settlement issues .1; review and analysis of master party contact spreadsheet and supplement same .3; email with US re same .1; emails and calls to settling parties re signatures .3; many emails with LO counsel re Annex settlement terms .3; call and emails with Wilson re AV Mobile settlement .3; emails with US re settlement issues .2; review and analysis of master tracking spreadsheet, phone calls to 5 parties re settlement .6; email to LO counsel re outstanding tasks .1;	8.3	
2/25: Attention to settlement master signature spreadsheet and binder update .7; preparation of master settling party contact database, review of court file, docket and corr for same 3.7 KD	0	4.4
2/26: Email with R Walker re settlement filing .1; emails with counsel re hearing date and settlement issues .5; review mutual and other new signatures, check master list, phone calls and emails to four parties re signatures .5; phone call from Wilson .1; email to JD and analysis re lists .2; emails with LL re settlement .1; emails with Bunn re Exhibit 4 .1; prepare and file notice of status .2; review new signatures and new list from JD, review notes, email to counsel re status .3; many emails with LO counsel re work needed .3; phone call from AB re settlement .3; phone call from BB re QH .1;	2.8	
2/27: Many (20+) emails and calls with counsel re settlement .7; phone call from SB .2	.9	
2/28: Emails with JD re settlement .1;	.1	
<b>TOTAL ATTORNEY HOURS</b>	<b>46</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>6.8</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: March 2015

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
3/2: Emails with JD and review current status list .2; prepare for conference call with all parties and attend same, memo to file 1.3; analysis re handling NE, call with DO, and emails with JD re same .3; emails with counsel re settlement issues .3; return calls to two CMs re settlement and membership issues .6	2.7	
3/3: Review revised Exhibit 4 .1; many emails with LO counsel re Ex 4 issues, Annex, and filing .5; many emails (20+) with MF re Juniper Hills issues, members, analysis re same, review class list, and modify Ex 4 .7; emails to counsel re settlement status .1; emails with WW, review Doe amendment and Ehreyabide file .1; prepare and revise draft motion for preliminary approval of settlement, legal research re same, review records and settlement terms for same 3.4; emails with Mackey re GSI billing .1; emails with JD re signature binder and filing .1; email to settling parties re settlement status .1; emails with DE re status of Annex parties .1; review and analysis of final stipulation for judgment, cf with master tracking spreadsheet .2; review final version of judgment and exhibit binder .4;	5.9	
3/4: Emails with US re missing signatures .1; emails with MF re Juniper settling parties .1; email to RWalker re status and location of hearings .1; review revised stip and exhibits .3; emails with KL re NE status .1; many (20+) emails with LO counsel re changes to exhibits .4; prepare class notice and email to JD re same 2.8; emails with JD re changes to motion for prelim approval, review and revise draft .3; prepare proposed judgment 1.0; prepare order of preliminary approval .9; emails with JD re settlement motion papers .1; prepare short form notice, check class website .2; review JD comments to same and revise .1; review and finalize motion and summary notice .5; review JD changes to proposed order, finalize same and emails to JD .3; emails with US re exhibit issues, and attention to fixing same .2; emails with MF re resolution of Juniper issues .1; phone call from Blum re settlement .4; emails with counsel re Blum offer and Annex parties .3; emails with JD re judgment .1; review and analysis re settlement exhibits and cover pages, emails with US re issues with same .3; phone call to TB and email to counsel re exhibit problems, attention to correcting same .3; review changes to class notice, revise same and emails with JD re same .5; emails with counsel re settlement issues, modify motion .4; review final filing package .2; emails with MD re signature issues .1;	10.2	

<b>3/4: Attention to review and organization of motion exhibits and settlement documents, review signatures for filing 1.2 AH</b>	<b>0</b>	<b>1.2</b>
<b>3/5: Review Willis expert and class rep motions .1; long email to LO counsel re strategy on Willis class .4; long email to JD re Willis .3; email to DO re settlement .1; emails to LO counsel re addition of new parties .1; email to Blum re settlement .1; emails with CM Wise re settlement .1; emails with counsel re Blum claim .1; review and analysis of Bolthouse agreement and long email to RZ re dealing with Blum claim .7; emails with DO re class contacts .1; phone call from CM Enger re status and settlement .4;</b>	<b>2.5</b>	
<b>3/6: Emails with US re settlement issues .2; phone call from Blum .2; emails with counsel re non signatories .2; emails with DO re Willis strategy and Blum .3; emails with CM Wise re settlement issues .2; emails with LO counsel re pending settlement issues .1;</b>	<b>1.2</b>	
<b>3/7: Emails with client re settlement .2; test class website links and email to WW re same .1;</b>	<b>.3</b>	
<b>3/9: Emails to and from potential CM Parsons re property issues, and adjudication .4; emails with WW and House re website .1; analysis re Parsons property and public records search .3;</b>	<b>.8</b>	
<b>3/10: Analysis re two Juniper residents class status and adjudication boundary issues .4; emails to and from Parsons re same .2; participate in settling parties conf call, memo to file 1.5; research and analysis re fee motion experts and counsel .7; email with DO and fee expert .2; phone call with Rich Zimmer re settlement issues and Blum .5; phone call with LO counsel re settlement issues 1.0; long email to R Pearl re fee motion .4; call from CM Parsons .2; review of AV trial transcript of November 4, 2014 .3; emails with LO counsel re trial experts and Williams .3; analysis re prove up experts and emails with TB re Wildermuth .3; emails with Parsons re property issues .1; emails with LO counsel re conf call re prove up .1; email to RK and DO re Estrada depo .1; attend LO conf call re prove up, memo to file 1.4; emails with JD re prescription .1;</b>	<b>7.8</b>	
<b>3/11: Phone call with Blum re settlement .3; email to same re same .1; emails with counsel re Blum and prove up .1; phone call from CM Lewis .3</b>	<b>.8</b>	
<b>3/12: Legal research on post judgment decertification issues 3.6; emails with counsel re West Valley .1; analysis re Blum claim and emails with counsel re same .4; emails with counsel re Willis class rep motion, analysis re same .2; emails with counsel re decert motion opp .1; prepare and revise opposition section for Willis motion 1.6; emails to and from PWS re same .2; conference call with setting parties counsel strategy and trial issues, memo to file re same 1.2; emails with LO counsel re decert motion .1; review draft motion from Bunn, email to same .2;</b>	<b>7.7</b>	

3/13: Phone call with RZ re settlement issues and Blum .3; analysis re class rep arguments, legal research re same, review D40 opp and emails with WW re same .8; emails with Blum re settlement .2; emails with counsel re Blum settlement and documenting same .3; emails with counsel re master settling party contacts and approval .2; emails with Wilson re settlement .1; emails with JG re Blum .1; review Phelan filings of this date .1; emails with US re consent and amendment issues, analysis re current lists and settling parties exhibits .4; email to KD and meeting with same re master contacts list project .2; emails with TB and KD re master list .2; review PWS briefs file this date .1; review and analysis of Phelan contract arguments, prior settlement, and emails with TB re same .5; phone call with Blum re settlement issues .3; prepare opposition to Willis class rep motion, review docket and exhibits for same, brief legal research .9; analysis re master contact list, emails with KD re same .4; emails with counsel re same .1;	5.2	
3/13: Meeting with MM re settling parties phone, email and address list, research and review re same and work on building and checking database for same 5.2 KD	0	5.2
3/14: Emails with counsel re settlement issues .4; review and analysis of master party contact list, modify same, and emails with counsel re same .7; modify list and email to settling party counsel re Blum and settling party consent handling .3	1.4	
3/15: Emails with settling counsel .1;	.1	
3/16: Many (20+) emails with counsel re non-settling party issues, analysis re Annex parties .7; phone call from LL and JD re Blum .2; phone call with DO re settlement hearings .2; review and analysis of new US list .1; meeting with KD re list project .1; phone call with Blum re settlement issues .5; emails with client re settlement issues .1; review and checking of new stipulating party database and email to US re same .3; review new AGWA signatures and emails to KD and US re same .1; phone call from Blum re settlement issues .3; emails with RW re color settlement docs .1; brief review of Willis opp and objections, emails with JD re same .4; review new Ex. 4 and emails with counsel re same .1; review new Annex contacts, emails to US and KD and DE re same .1; emails with counsel re reply to Phelan and Willis .2; emails with LO counsel re Ex. 4 and Blum .1; analysis of water allocations and email to US re pool available, call from same .3; emails with US re and review email to all parties re Blum .1; emails with LO counsel re handling Blum addition .1;	4.1	
3/16: Supplement contacts list with signature pages and new contact info, compare with settlement exhibits and other records 1.6; preparation of court settlement binders 1.2	0	2.8
3/17: Many emails with US re settlement issues, check and revise master spreadsheet .5; review drafts of Exhibit 4 and emails with TB re same .1; emails with RWalker re court settlement binder .1; review Dunn letter, call from JD and TB, and emails with same .2; review NE signature and emails with counsel re same and Blum .1; analysis re handling Blum settlement and long email to same, review stipulation and prior corr .3; review emails with counsel .1; email to Blum re status and Ex. 4 revision .1;	1.5	
3/17: Revise and complete court settlement binder and copy for MM 1.1 KD	0	1.1

3/18: Email to RZ and LO counsel re prove up issues and strategy .4; emails with LO counsel re settlement .1; phone call with C Sanders re settlement and call with all larger public and private landowners re prove up trial and prescription 1.6; emails to and from EG and JD and settling parties .1; review stip and email to Blum re same .1; prepare draft email to D40 .1; emails with US re settlement issues .1; emails with EG and LO counsel re meeting agenda .1;	2	
3/19: Review status of Blum approval .1; review Willis reply briefs and CMC stmt .2; preparation of reply brief re settlement, review Phelan and Willis filings, D40 reply 1.1; conf call with LO parties re settlement issues, review judgment and emails with same, memo to file 1.1; emails with EG re meeting, and prepare notice of withdrawal .3;	1	
3/20: Phone call from R Zimmer re settlement issues .5; phone call from SK re same, memo to file .8; emails to and from EG and LO counsel re settlement issues .4; emails with DO re same .1; phone call with TB, memo to file .2; review draft stipulation, emails with counsel re same .1; many emails with counsel re meeting and agenda for same .1;	2.2	
3/21: Prepare for and attend conference call with EG, RZ and TB, memo to file 1.7; emails to LO counsel re same and strategy for Monday meeting .2; review and revise do-over stip and emails with counsel re same .3; review of stipulation and emails with counsel re prescription protections .3;	2.5	
3/22: Emails to and from LO re meeting .2; review EG prescription email and underlying authority .7; emails to and from EG and RZ re settlement .2; review new drafts of stip, revise same, and emails with SK re same .4;	1.5	
3/23: Review new EG email and analysis re case authority .8; prepare for group settlement meeting .3; travel to and attend meeting, phone call with Dubois re settlement issues 5.5; email to Blum re and LO counsel re settlement .1; review and revise notice of filing, emails with counsel re same, review amended settlement documents .2;	6.9	
3/23: Review and analysis class member property records for expert survey and preparation of memo re same 3.5	0	3.5
3/24: Many (15+) emails with counsel re revised settlement filing, review of drafts and final .6; phone call from Ruderow re settlement issues and prove up .3; emails with counsel re settlement issues .2; review of Phelan writ and some exhibits .2; analysis of means of proving CM past self-help, legal research re evidence issues impacting same 1.8	3.1	
3/25: Many (35+) emails with counsel re settlement issues .5; review new stip language, email to RZ re same .1; emails with LO counsel re same and review WS revisions .1; prepare for and attend conference with settling parties re hearing preparation, memo to file 1.4; review and analysis of motion filings and underlying case law, prepare for motion hearings, prepare argument outlines 2.8; phone call from and emails with Wilson re settlement .3;	5.2	

3/26: Prepare for hearings 1.1; emails with Wilson re settlement .1; travel to and attend hearings on prelim approval and Willis motions, meeting with SK and BJ re settlement, and meeting with settling counsel prove up issues, memo to file 6.8; email to administrator re class notice .1;	8.0	
3/27: Review and analysis of CM records for survey, KD database and meeting with same .4; emails to and from administrators re notice .2; emails with SK and US re settlement .1; review opp to writ and MO .1; emails with DO re writ .1; emails with counsel re trial and settlement issues .2; emails with TB re notice of trial .1; preparation of memo re prove up hearing testimony, category and order of proof, phone calls to LO counsel re issues with same .9;	2.1	
3/27: Continue review and analysis class member property records for expert survey and preparation of spreadsheet for data 3.9	0	3.9
3/28: Emails with SK re Willis claims .1;	.1	
3/30: Emails with administrators and JD re notice .2;	.2	
3/31: Emails with GCG re notice .3; many emails with US re settlement issues .3; email to settling parties re AV Mobile problem .2; emails with MF re AGWA changes .1; emails with DE re Annex parties .1; many (50+) emails with counsel re settlement .3; emails with DH re settlement package changes, review of signatures and related file materials .4; emails with RZ and review stip language .1; review new signatures and emails with counsel re same .1; emails with JD re class notice .1; review Zimmer memo and emails with LO counsel re same .1; emails with DO re status .1; brief review of GCG database and cf with prior version, check class membership and filings on same .3;	2.5	
<b>TOTAL ATTORNEY HOURS</b>	<b>89.5</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>17.7</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: April 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
4/1: Review and analysis of prior court orders and filing, legal research on public records for numerous class members and potential class parcels relative to self-help 3.4; emails with counsel re settlement amendment .2; review and revise class long form notice and emails with Penny re same and class notice .9; check website and email to JD .1; review and analysis of class list changes, court file, and prior class databases, email to RW re opt ins problem .8; phone call with DO re settlement strategy issues .4; review of Kuney spreadsheet on prove up and emails with counsel re revisions .2; revise preliminary approval order .2; emails with LO counsel re order .1;	6.3	
4/1: Attention to review and revision of class mailing list 1.9 KD	0	1.9
4/2: Review of RGK party list and emails with counsel re same .2; emails with GCG re class list and notice changes, review drafts of same .6; emails with TB re Ex 4 .1; emails with LO counsel re handling non stipulating parties .2; review SK disclosure and emails with counsel .1; status email to Pearl .1; many (40+) emails with LO counsel re settlement issues .6; review final class notice, email to Penny re changes .2; emails with DO .1;	2.2	
4/3: Review of class website and prepare and revise FAQs, and list of changes to same 1.3; attend AV landowner call on settlement .7; email to KL re checks for GSI .1; review prove up numbers from LO counsel .1; emails and call from CM Chavez .3; review of new stip and emails with LO counsel re same, execute same .2; emails with counsel re Phelan offer .1; phone call with RK re settlement .3;	3.1	
4/4: Emails with Do re settlement .1; review and analysis of Sonrise claim and many (20+) emails with SK and counsel re same .5;	.6	
4/5: Emails with RGK and analysis of Sonrise memo .3;	.3	

4/6: Phone call with SK re Van Dam, memo to file .5; phone call with RGK re same .4; research and analysis re public records, review settlement agreement and prepare and revise long email to SK re Van Dam issues 2.8; emails to LO counsel re same, and revise email .3; phone call with SK re resolution of claim, memo to file .4; phone call to RGK re same .4; emails to and from LO counsel re handling of Sonrise claim .4; email to SK re Sonrise solution .2; phone call with CM Clechefski re settlement .3; email to LO counsel re class notice .1; review revised prove up spreadsheets .1; emails with counsel re Sonrise and prove up issues .2; check website and emails with D40 and client re same .1; emails with LO counsel re Ex 4 changes .2; phone call from MD re settlement .2	6.6	
4/7: Emails with BBK re Sonrise .1; phone call with CM B Bellanca re settlement issues, memo to file .6; phone call from SF re website .1; phone call with CM Jones re settlement Qs .3; phone call from CM W Felder re settlement and class def issues .8; phone call with SK re Sonrise Farms issues, trial issues memo to file .5; phone call from CM Chavez re settlement .4; phone call from CM Sutton re settlement issues .3; review Milana objection and filings .1; emails with counsel re Sonrise .1; emails with SF re website and review same .2; emails with LO counsel re stipulation .1; review claims of non stipulators and emails with Wilson re settlement .2; brief review of Willis filings .1; review GSI invoices and call to Mackey re same .1; review Ex. 4 and emails with counsel re same .1; analysis re published notice and email to SF re same .1;	4.2	
4/8: Phone call from CM Vargas .4; long email counsel re Van Dam .2; emails to and from Klotz, analysis re membership issues, call with same .7; phone call with CM Schnaidt re settlement .4; emails and call with CM Simonis .5; emails with counsel re class notice .1; emails with SK re Van Dam .1; emails with US re revised settlement .1; emails with SF re published notice .1; emails with client re status .2;	2.8	
4/9: Phone call with CM Ojeda re settlement issues .3; long call with V Klotz re potential objections to settlement, adjudication issues .9; many (20+) emails with counsel re published notice .5; phone call to AV Press re publication .1; review AV press proof and call to Adams re same .2; emails with DO re hearing .1; call from GCG and email to clerk re prelim approval order .1; emails with LO counsel re class notice .1; phone call from CM Byrd re settlement .3; emails with SK re Sonrise n/c	2.6	
4/10: Emails with RK re depo .2; attend landowner conference call re trial and settlement issues, memo to file 1.5; phone call with CM Klotz re settlement objections 1.0; phone call to CM Jung re settlement and survey .4; prepare for and attend status conference with court, memo to file .8; emails with DO re trial .1; emails with LO counsel re trial issues .1; review approval order and emails with SF notice .1; call to RK .2;	4.4	
4/11: Email to client re class notice .1;	.1	
4/12: Emails with client .1; emails with CM Chavez .2;	.3	
4/13: Phone call from CM R Ellis re adjudication issues .5; phone call from DM Jung re settlement and allocation issues .4; phone call with CM Klotz re potential objections .9; emails with DO re status .1;	1.9	



4/14: Emails to and from BB re trial .1; phone call from R Ellis re settlement concerns and issues .8; emails with DO re trial .2; email to JD re objections .1; emails with SK re Sonrise n/c	1.2	
4/15: Phone call with SKuney re settlement issues .5; emails with DO re work allocation .3; participate in LO conf call re trial prove up issues 1.5; phone call with Bunn re settlement issues .2; attention and research re handling self help on classwide basis, review and analysis of real property records 2.4; phone call with CM Bellanca re well sharing issues and settlement .6; emails with TB re Wildermuth testimony, review depo summary of same .3; phone call with Bunn re trial and class issues, memo to file .5; emails with client .1; analysis re trial timing and presentation issues .3; email to counsel re same .2; phone call with Dunn re court expert and trial issues, memo to file .2; emails with RK re Estrada depo .2; research an analysis re David Estrada land holdings, research on public records, and email to various counsel re determination of past water use 1.3; phone call from WB re settlement .2; phone call with TB, memo to file .2; emails with LO counsel re Epstein and Estrada .1; review MO and email to counsel re trial, analysis re schedule issues .2; email to D40 re Willis claim .2; phone call with RK re motion to withdraw, Estrada depo, long email to DO re appellate and law and motion issues .8; review and analysis of SK memo on expert testimony, prepare notes re same .2; email to JD n/c	10.5	
4/16: Phone call from Dan Epstein re settlement negotiations for Desert Breeze 1.3; email to counsel re same .1; emails with McNevin re Sorrento .1;	1.5	
4/17: Emails with MF and Epstein .1;	.1	
4/19: Return phone calls to 14 CMs re settlement issues 4.3; emails with client re Estrada .1;	4.4	
4/20: Phone call with client re settlement, discovery and trial issues .8; phone call to CM Franc .3; phone call from CM Dunn re settlement issues and water use .6; phone call with RK re discovery and settlement issues, memo to file .6; phone call from DO re discovery committee issues .2; phone call with CM Firisick re settlement and water use issues .5; phone call with CM Bovee re settlement issues and water use .6; phone call from CM Pinjero re class notice .3; legal research on CM (80 parcels) real property records for survey and data for historical self help claim, analysis re same, review CM records and preparation of master summary memo re same 7.3; emails with client re Estrada and survey .1; email to TT re CM Dunn .1; emails with counsel re discovery comm .1; email to TT re data errors for numerous CMs .3;	11.8	
4/21: Return calls to 4 CMs re settlement 1.1; phone call with CM K. Metter re many class parcels and issues, settlement objections, review property records, emails to same and memo to file 1.2; emails and call with BB class issues .3; emails with GSI and analysis re payment issues .2;	2.8	
4/22: Emails and call with client re Estrada properties .2; call with CM Tyler re many settlement issues and potential objections 1.1; analysis re Estrada discovery issues .4; emails with SK re Sonrise .1; emails with BB and CM Lane and Dyas re shard well issues .2; emails and phone call with CM Francouer re survey and settlement .4; emails with PWS re expert bills .1;	2.5	

4/23: Phone calls with 5 CMs re settlement issues 1.3; analysis evaluation of discovery and trial issues for numerous non stipulating parties .7; emails with settling parties re Sonrise .2; phone call with client re trial testimony, depositions and Willis class .5; review of LA county assessor maps and long email to PWS re issues for defense of Willis class phone call with settling parties re witness and trial issues 2.1; phone call with T Bunn re experts at trial, memo to file .5; legal research on expert co-designation and emails with LO counsel re same .3; email to TT re expert report .3; email to LO counsel re trial experts and designation issues .4; phone call from CM G Sutton re settlement issues and shared well .4; email to same re settlement provisions .2; emails with Zlotnick re testimony issues .1; call with CM Reasor re settlement and property history .5; phone call with CM B Rogers re survey and settlement .7; review Cal Water exhibits .1; emails with MD re Sonrise .1; emails with CM Francouer re settlement issues, call to same re property questions .4; conf call with LO counsel re trial .6; phone call from CM Sutton, and emails with same re settlement .5; emails to TB and LO counsel re Estrada properties and boundary .1; emails with LO counsel re trial experts .2;	10.2	
4/24: Emails and call with Wilson re prove up .2; emails to and from numerous counsel re Sonrise handling .3; prepare long email all settling parties re Sonrise, review documents and revise same .5; review SK disclosure and emails re same .1; prepare and revise witness and exhibit list .8; review Wagas and PWD exhibits .1; emails with counsel re expert issues .2; many emails with PWS and GSI re expert bills, analysis re same .3; emails with US re amended settlement .1; emails with TB and SK re Sonrise .1; prepare ex parte re expert bills, email to KD re same .1;	2.8	
4/27: Emails with JT and GSI .1; review and analysis of exhibit lists .5; emails with settling parties re amendments .1;	.7	
4/29: Emails and call with CM Rodgers re survey and property issues .4; review Willis CMC stmt and disclosures .2; many (20+) emails with counsel and Epstein re Desert Breeze settlement .4;	1.0	
4/30: Emails and call from Epstein re Desert Breeze settlement, review and analysis of records .5;	.5	
<b>TOTAL ATTORNEY HOURS</b>	<b>85.4</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>1.9</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: May 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
5/1: Phone call from client re settlement issues .3;	.3	
5/2: Emails with SK re Sonrise .1;	.1	
5/4: Conference call with stipulating parties re trial issues, memo to file re same 2.7; attend telephonic status conf with court 1.5; phone call from Epstein re settlement .2; email to LO counsel re same .1; emails with DO .1; emails with US re Ex 4 changes .1; emails with SK re settlement .1;	4.8	
5/5: Emails with counsel re Desert Breeze settlement and discovery issues .4; emails with Epstein re settlement .1; return phone calls to three CMs re settlement .8;	1.3	
5/6: Review SK issue outline and supplement same .6; conf call with LO parties 1.3; emails with GSI re payment status .1; emails with TB re Willis and settlement issues .2; public records search and review of court filings re Archdiocese properties .4;	2.6	
5/7: Call with RK, memo to file re same .6; analysis re Archdiocese class member status and potential issues re same .8; email to TB re same .2; review discovery orders and JD letter .1; emails with LO counsel re settlement meeting .1;	1.8	
5/8: Emails with counsel re settlement meeting .2; return calls to two CMs re settlement .5	.7	
5/11: Emails with Wilson re settlement proposal .1; review Reesdale evidence, emails with LO counsel re same .2; participate in court ordered settlement conference 4.2; analysis re Willis settlement options and emails with LO counsel re same .4;	4.9	
5/12: Emails with LO counsel re settlement .1; review Tapia filing, email to client re status .1; emails with CM Ocwen .2; review joint CMC stmt .1;	.5	
5/13: Phone call with CM Doucet re settlement issues .5; phone call with atty S Alvarado re bank client CMs and impact of settlement on REO properties .7; emails with counsel re settlement .1; review CMC statements .1;	1.4	

5/14: Analysis re Ocwen bank client class member ship issues and email to Alvarado re same .5; phone call from CM Nishimura re settlement .4; review Willis filings, email to DO .1;	1.0	
5/15: Review and analysis of CMC statements .2; legal research re proof at trial issues and potential waiver of Willis objections to evidence, long email to US re same 1.4; review McGuigan case and email to DO re same .3; emails with DO re Willis issues .2; telephonic status conf, memo to file re same .5; emails with LO counsel re trial brief .1; review and analysis of Phelan opposition .2;	2.9	
5/17: Review of Tapia data and emails with counsel re same .2;	.2	
5/18: Emails with client re new settlements and class impact .2; email to counsel re objections .1;	.3	
5/19: Emails and call with GCG re notice status and issues .4; return phone calls to 4 CMs, update master client contact summary .1.0	1.4	
5/26: Review Tapia declarations and evidence .1; review and revise GCG class notice declaration .8; review new Willis motions .1; review new settlement docs from SK .1; emails with GCG re decl .1; emails with settling counsel re settlement strategy .5; emails with DO re same .1; emails with MF re new settlements .1;	1.9	
5/27: Emails with counsel re handling new settlements .4; return calls to 4 CMs re settlement and membership issues, analysis and emails re same 1.1;	1.5	
5/28: Many emails with counsel re handling new settlements and settlement committee .4;	.4	
5/29: Attend settlement committee conf call, memo to file 1.7; call to Epstein and email to comm re same .2; call to Holmes re Ehyberbide discovery responses and settlement .2; prepare draft email to all settling parties .6; many emails to and from Committee re handling same and deal terms .4; conf call with LO counsel and JD re settlement prove up and expert issues, memo to file 2.1; phone call with MF re expert issues, memo to file .3; emails and phone call with CM Hooyerink re settlement issues .4; review SK draft settlements and emails with same .2; prepare settlement exhibits, revise and finalize email to all settling parties re non-stipulator negotiations .6; review exhibits and revise and send settlement email to all parties .2; emails with GSI re payment status, analysis re same and email to KL re issues .2; review Williams depo prep binder and email to LO counsel re same .3;	7.4	
5/31: Emails with counsel re new settlements .2; return calls to two CMs re settlement .6	.8	
<b>TOTAL ATTORNEY HOURS</b>	<b>36.2</b>	
<b>TOTAL PARALEGAL HOURS</b>		

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: June 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
6/1: Emails with LO counsel re settlement issues .2; review consents and prepare summary email re same .1; draft email to JD re Williams .1; attend LO counsel conf call on handling experts at trial, conf call with JD, memo to file re Williams questions 1.6; revise Williams email and send to JD n/c; phone call with Holmes re Eyharabide, memo to file on past water use .3; review and revise class notice declaration and emails with GCG re same .6; emails with US re settlement .1; emails with JD and LO counsel re model .1;	3.1	
6/2: Phone calls with Ed Petti and C Keith for Leisure Lakes re litigation, settlement and class issues 1.8; emails with counsel re LL settlement issues for numerous parties .4; review and analysis of LL records and class membership, emails to and from Petti re same .5; emails with WW re LL and check database and class Q index for Goodyork .3; phone calls to and from attys Chock and Fisher re LL and litigation issues 1.4; long email to negotiating comm re LL issues .3; emails with Fisher re trial issues .1; phone call with Sloan re trial experts and non stipulators .4; phone call with Sanders re LL and non stipulators .2; emails to and from RZ re same .1; review and analysis of PWS opposition to Willis motions .2; emails to and from LO counsel re reserved right .1; review outline for Williams meeting questions and emails with LO counsel re strategy for same .3; review revised class notice decl. and emails with Penny re same .3;	6.4	

<p>6/3: Phone call with MD re trial experts and model, non-stipulating party issues, memo to file .5; emails with MF re settlement of new claims .3; phone call with Kuney and MF re trial expert non stipulator negotiation issues 1.4; phone call with RGK re Tapia, Williams and settlements .4; email with D40 re Tapia .3; call with Dubois re revised stipulation filing and Williams issues, review file on non-stipulator signature and exhibits, emails to JD re handling same .8; many emails with US re settlement issues, review confirmation emails .2; research and analysis re Tapia claim, review of Tapia declarations and documents, and long summary email to committee re: handling strategy and issues 1.5; emails with LO counsel re Reesdale, Desert Breeze and Milana settlements .1; phone call with settlement comm, memo to file re to do list 1.4; prepare and revise long email to MF re Tapia claim, analysis of records .5; phone call from atty Chock re Leisure Lakes .2; review and analysis re LL class history, service and Q data, email to committee re same .6; emails to and from WW re class status .2; analysis re handling L Lakes potential claim, review of CMO, and long email to Chock re same .6; emails with GSI re payment issues .1;</p>	<p>9.1</p>	
<p>6/4: Emails with counsel re Williams meeting and strategy for same .3; review of notice declaration and exhibits .2; phone call to Administrator .3; review of summary notice order, proofs, and prepare MM Decl re class notice notice .5; emails with settle. Comm. Re new settlements .3; preparation for Williams meeting and review and analysis of Williams transcript, preparation of questions on modeling 1.5; review SK email and stipulation drafts .1; many (15+) emails with PWS and Mackey re GSI payments, review and analysis re accounting records .3; review Tapia stipulation and many emails with SK re same .3; long email to Stead re Ehyerabide settlement .2; emails to Brumfield and call to same re settlement for Tapia .2; email to RGK re settlement n/c</p>	<p>4.2</p>	
<p>6/5: Review of expert testimony memo and many (15+) emails with LO counsel re same .5; participate in expert phone call with Binder and Wagner re trial testimony and strategy issues 1.9; call to MF re experts .1; emails with PWS and GSI re billing issues .1; email and call with JD re experts, memo to file .2; email to MF re same .1; email to client re status and meeting .1; phone call to Cal Stead .1; prepare for meeting and attend Williams modeling conf call, memo to file 2.2; review PMK depo notice for Tapia, preparation of RFP to Tapia, emails with Wang re same 1.2; emails with TB re Phelan settlement .1; many (20+) emails with LO counsel re D40 expert strategy .4; review and analysis of Williams slides .3;</p>	<p>7.3</p>	
<p>6/7: Review and analysis of PMK depo notice and revise same and RFP 1.3; emails to Wang re handling Tapia discovery, including analysis of Tapia records .5; emails to and from LO counsel re Tapia discovery .2; analysis and review of class member real property records, class databases, and tax assessor records for prescriptive period self help case at prove up 3.7; emails with Stead re settlement n/c</p>	<p>5.7</p>	

<p>6/8: Phone call with RK re settlement ideas, memo to file .4; emails with PWS and GSI re expert invoices .1; email with LO counsel re settlement and call to Wilson re same .1; phone call from CM Csaki re settlement and membership .5; phone call from Cal Stead .1; review depo notice of Tapia, comment to same and revise RFP 1 to same, emails with Wang re same .5; review and analysis of West Valley dec and records .1; phone call with CM Sides re property issues .3; phone call to Rogers .1; phone call with CM Mary Murphey re property history and settlement .4; phone call with CM Reasor re property history and settlement .3; call with CM C O'Laughlin re property history, settlement issues .6; emails with LO counsel re experts .1; review Willis motion filings of this day .2; review and analysis of CM public records and file materials for survey, prepare memo re changes to same and email to TT re same 1.3; emails with Brumfield re settlement n/c</p>	<p>5.1</p>	
<p>6/8: Analysis of survey spreadsheet and client records, editing of same and creation of legend and apply same, phone calls to five CMs re property questions 1.7 AH</p>	<p>0</p>	<p>1.7</p>
<p>6/9: Phone call with Walter Wilson re settlement .2; emails with Stead and settlement comm re settlement .2; many emails to and from Robar, review and analysis of real property records case docket, email to settlement committee re handling same .7; email to LO counsel re Robar .1; attend LO conf call re prove up experts, discovery, and non-stipulator issues 1.8; phone call with CM Dale Webb re prop history and settlement .4; phone call with B Rogers .1; emails with Clifton re Robar claim .2;</p>	<p>3.7</p>	
<p>6/10: Phone call with B Rogers re Fairmont TC meeting issues, settlement provisions, trial, and expert issues .5; emails with LO counsel re nonparties .2; emails to and from counsel re handling Robar issues .3; phone call with CM O'Laughlin re declaration .1; emails with Brumfield and Wang re Tapia discovery .1; emails with LO counsel re same.1; phone call with Bunn re experts and settlement .4; phone calls to SK and RGK re Leisure Lake and Robar history, settlement and trial issues .7; review Brunick memo on prove up, emails with counsel re same .1; review Willis CMC, call to RK .1; emails with RGK re Robar and experts .2;</p>	<p>2.8</p>	
<p>6/11: Phone call with CM Rogers .1; prepare draft declaration for Rogers, emails with same, and revise decl .4; phone call with CM T Schnaidt re settlement objections, survey issues, and property history .7; review and analysis of expert designations and prepare 2034 response .5; emails with DO re experts .1; many emails with SC re Tapia claim .3; phone call with CM Schweitzer re settlement and ownership issues .6; email to CM Thurston .1; emails with Wang re Tapia claim assessment .1; emails to LO counsel re Tapia claim history .2; phone call with CM Thurston re settlement and ownership issues .5; email to counsel re prove up hearing .1; prepare Thurston decl. and email to same, revise decl .3; review and analysis re Tapia material and phone calls to LO re handling settlement .9; emails to and from G Fisher, analysis re response from and Leisure Lake records, and email to same re class Q and notice issues .6; emails with SK re Tapia .1; review Tapia Ag permit and emails with counsel re same, emails to and from Wang re website .1; email to TT re survey info status .2;</p>	<p>5.9</p>	

6/12: Phone call with CM B Smith re settlement, prop history, trial and settlement .6; prepare B Smith Decl and emails to and from same .3; phone call to CM Sides re survey .2; call with CM email to DO re Smith .1; review and analysis of Maldini records, and phone call to same .4; review of draft CMC statement and email to Wang re comments .3; phone calls to and from CM Reasor re settlement and property history, draft and revise declaration .9; emails to and from Reasor re trial and declaration .2; phone call to Maldini .1; phone call with CM G Webb re property history and settlement issues .5; prepare D and G Webb declarations, call with O'Laughlin re same .6; prepare notice of unserved properties, analysis re records for same .6; analysis of Willis experts, online research re same and email to counsel re depositions of same .7; phone call with CM Steele re settlement, property history issues .7; email to DO re Willis experts .1; review and analysis of expert disclosure, emails to counsel re expert depositions .4; review CMC statements .1; review Tapia subpoena and emails with counsel re same .1; email to DO re fee motion issues .1; emails with TT re CM declarations, survey .2; review Willis and other filings of this date .1;	7.3	
6/12: Analysis of survey spreadsheet and client records, editing of same and creation of legend and apply same, phone calls to two CMs re property questions, and organization of CM records 1.8 AH	0	1.8
6/13: Review and analysis of Sterling, Murphey and Maldini records phone call with CM J Sterling re prop history and settlement .4; prepare Steele decl, call to same re same .5; emails to and from Wilson re Leisure Lakes settlement and class status issues .5; prepare for and attend CMC, memo to file 1.8; phone call with CM Maldini re settlement .3; emails with LO counsel re LL .1; prepare Sterling declaration .3; prepare Stevens decl, review records re same .4; prepare Murphey decl, public records search for transaction dates .5; emails to and from Wilson re LL, phone call from same .5; email to KD re handling class member records and decls .1;	5.4	
6/15: Westlaw research on testimonial history of Willis experts, prepare summary of same .8; emails with RZ and analysis re Phase 4 issues, review transcripts re same .5; attend status conference, memo to file re same, emails with client 1.0; phone call and emails with Wilson re LL .3; emails and call with CM Thurston re decl .1; conf call with LO counsel re settlement and trial issues .8; email with Wilson re class membership .1; emails with client re status .1;	3.7	
6/16: Review AVEK memo .1; emails with client and review records .2; emails with RK re class list and review history with production and filing of same .2; phone call from CM Smith .2; phone call from Wang n/c	.7	
6/17: Emails with RK class list .2; emails and phone calls with W Wang re class, settlement and handling non-stipulators .7; emails with LO counsel re settlements .2; review and analysis of CM database file, cf with public records and client documents, instructions for further modification of same 1.1; email to TT re same .2; review of Willis discovery .1;	2.5	



6/18: Phone call with R Kalfayan re class issues, trial, discovery and settlement, memo to file 1.2; phone call with client re case status, settlement and trial issues .7; review and analysis re prior class order and notice, email to Wilson re Leisure Lake status .4; emails with client re class definition issues, analysis re same .2; emails with Stead re settlement .1; review of Willis and Tapia discovery .1; emails to TT re survey .1; emails and call with Wilson re LL settlement .1;	2.9	
6/19: Review and analysis of Mojave basis records and BB memo .2; emails with CM Rodgers .1; emails with SK re settlement .1; email to CM Maldini re survey, call to same .1; review TT depo notice and analysis re responsive records .2; review and analysis re Willis and SP class order and cert history, class notice, and Phone call with DO re same .8; research on public records for 11 survey CMs, analysis re same .8; emails with DO re Willis overlap .1; emails to TT re survey and CM records .2; email to RK re class issues .2;	2.8	
6/22: Phone call with Henry Maldini re settlement and property history issues .4; review and analysis re Swayze and Maldini records, check public records re issues .4; phone call to Swayze re properties in class .2; review and analysis of CM decls, update master SS, and long email to TT re survey issues .5; review and analysis of phase 4 transcripts re handling of court expert for trial .4; research on missing CM survey public records, review spreadsheet re same .4; emails with JD re final approval .1; phone call to CM Austin re property issues and records, settlement issues, memo to file .3; prepare Maldini decl, phone call to same .3; emails with TT re depo and updated spreadsheet .1;	3.1	
6/23: Attend settlement comm conf call, memo to file re same 1.2; emails with DO re final approval motion .2; phone call with W Wilson re Leisure Lake and email to counsel re same .3; review of notes, summary and database documents for Willis list .2; call with CM Murphey re survey, settlement and trial issues .3; prepare instructions for copy co re hearing binders .1; many (20+) emails with counsel re settlements .1; emails with Wang re class pumping n/c	2.4	
6/24: Emails with MF re Tapia .1; review emails and file server materials and notes, emails with RK re Willis class list .4; participate in expert and trial conference call with settling parties, email to DO re same 1.9; emails with RK re court expert depo and class lists .2; phone calls with Reasor, Sides and Maldini .2; emails with RK re Thompson depo .1; legal research on Firsick property .1; emails to and from Thompson re various issues .2; phone call with CM Swayze re property history and settlement .5; review and analysis of stip provisions re cooperation and trial proof .1; email to LO counsel re same .1; phone calls from L Quass re Leisure Lake issues .8; emails with TT re survey issues .1;	4.8	
6/25: Phone call from atty Quass re party and conflict issue .2; phone call from Doug Martin re CM Smith issues and settlement impacts .4; emails with TT re survey and deposition issues .2;	.8	
6/26: Review of CM declarations, email to Smith re same .1; phone call from Quass re LL sale .3; emails to Wang re same .2; emails with LO counsel and D40 re same .2; call with CMS re settlement issues, review and analysis of Latham history as counsel and email to Quass re conflicts .4; emails with Wang re LL and email to RK re Thompson depo .1;	1.3	

6/28: Review revised stip and emails with SC re same .1; long email to R Pearl re fee motion issues and case history .8; emails with DO re final approval and analysis re list of stip parties .2;	1.1	
6/29: Phone call with DO re final approval and settlement issues .4; review and analysis of new client pump test records .2; phone call from client re pump tests, case update, settlement issues .7; emails with DO re draft motion for final approval and Delano parcel, call with same .3; email to SC re Rosamond MHP .1; phone call from D Martin re CM B Smith settlement issues .4; review and analysis of revised settlement stipulation, legal research on 664.6 issues and long email with comments to committee 1.1; email from Brumfield re Tapia discovery, review of CMO and discovery, and prepare email to comm re handling same .6; email from MF, review stip, and draft response re Sunnyside issue .3; emails to and from RK re settlement .1; emails to and from counsel re Tapia issues, revise discovery response and email to Brunfeld re same .3; email from CM Delano, assessment of class DB records, real property search, and long email to same re settlement questions and class status .5; phone call form Delano .2; emails with Pearl re fees issues .1; emails with SC re Tapia claim .1; emails with TT re survey records .1;	5.5	
6/30: Phone call with RK re class issues, expert discovery, trial, and settlement issues, email to DO re same 1.1; email with DO re Willis .1; review and analysis for LL claim records and analysis re class membership issues, emails with settlement committee .7; email to LO counsel re Willis challenge and settlement option .4; emails with client re declaration .1; emails with Quass re LL sale .1;	2.5	
<b>TOTAL ATTORNEY HOURS</b>	<b>100.1</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>3.5</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: July 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
7/1: Review and analysis of revised stipulation, and emails to and from counsel re handling same .3; emails with DO re conflict issue with MD and WW .1; email to TT re depo .1; emails to and from LO counsel re discovery issues .3; review and analysis of Willis depo notice, CMO, and long email to counsel re handling same .7; emails to and from DO re settlement issues .2; emails with counsel re LL Doe amendment .1; phone call from client re trial and discovery issues, settlement prove up .5; emails with LO counsel re LL and TT depo .1;	2.4	
7/2: Attend SC conf call, memo to file re same .8; emails to counsel re depositions .1; review draft BB letter, comments to same, and filings of this date .1;	1.0	
7/3: Emails with TT re report, brief review of same .2;	.2	
7/4: Emails with client re status, emails with LM re letter .1;	.1	
7/6: Review revised trial stipulation and comments to same .1; review Desert Breeze records and emails re same .1; emails with LO counsel re trial issues .1; emails and call with CM Lightner re adjudication and settlement .5; return phone calls to three CMs re settlement and water issues .7; phone call from RGK .3;	1.8	
7/7: Attend LO conf call re trial issues and CMC statement 1.2; emails with DO and PWS re CMC stmt .1; emails with LO counsel re same .1; phone calls to TB and JD, emails with TT .1; review and analysis of PWS CMC statement, markup of same .2; emails with Wang and LO re CMC stmt .3; review draft LO CMC statement and prepare comments to same, review redlines of 3 other attys .5; attend LO conf call with JD, call to Dubois 2.0; phone call from CM Swayze re survey and settlement issues .3; commence detailed review of TT expert report, summary memo re same .9; emails with DO re trial witnesses .1; emails with US re trial issues .2; review revisions to LO CMC stmt and emails with LO counsel re same, insert new changes .3; review all filed CMC stmts, email to client re same .1; phone call with DO re trial and expert report .3; email from Wilson n/c	6.7	

7/8: Emails with RK re expert report .1; phone call with CM Quigley re class membership and settlement issues .4; phone call with Walter Wilson re settlement, trial and LL issues, memo to file and settlement comm .5; email to all parties re non-stipulating party issues .2; continue review of summary expert report and exhibits .8; call and emails with RGK .1; emails with LO counsel re new settlements, and LL .3; emails with SK and US re revised stipulation, review of Sonrise documents .2; emails with client re expert report .1; attention to revision of draft motion for final approval, MM decl., and proposed order approving settlement 2.6;	5.3	
7/9: Phone call with client .4; review of Dubois filing and emails to and from same re same .3; preparation of client declaration, including review of client records 1.0; many (35+) emails with LO counsel re trial issues, settlements and prescription .6; review Maldini decl, call to same and email to TT re same .1; review and analysis of Thompson Appendix documents and class member records 3.4; prepare instructions for filing expert report .1; review of revised stip from Dubois and emails to and from same .3; attend settling party conf call re hearing and trial issues 1.3; emails to and from settlement comm. and RGK .2; email to client re courtcall .1; review Williams letter and documents, email to LO counsel .1; review new stip filings, emails with US and LO counsel re same .2; emails with client re Williams .1;	8.2	
7/10: Attend telephonic phone conference with settling parties regarding trial issues 1.4; attend CMC, memo to file 1.5; emails with KD and RW re expert report and new version of stipulation for court .2; review depo notices and objections .1; emails re Wildermuth testimony .1; emails with counsel re trial issues .1;	3.4	
7/11: Review and analysis of Willis conflict motion papers .2; email to RK re same and change of hearing date .1; email and call to Olaf re motion .1; emails with DO and client re conflict motion .2; review historical corr re class composition and definitions for opp to Willis motion, emails with DO re same 1.2; emails with LO counsel re trial issues and Willis .2; prepare and revise ex parte application re Willis motion, MM decl. .6;	2.6	
7/12: Emails with DO re ex parte .1;	.1	
7/13: Emails with Olaf, RK and DO re Willis motion .2; review and comment to JG trial memo .2; review Willis ex parte and filings of this date .1;	.5	
7/14: Emails with DO and RW re ex parte .1; emails with client re expert report .1; emails with counsel re settlement .2; emails with Wilson re stip n/c	.4	
7/15: Emails with RW and review MO and RK letter .1; review Willis motion to enforce .1;	.2	
7/16: Review of conflict motion filings and prepare for hearing .7; attend telephonic ex parte hearing, memo to file .7; emails with LO counsel re Willis motion .2; review MO of this date and email to DO re same .1; phone call from John U, memo to file .1;	1.8	
7/16: Attention to class list overlap analysis 3.1 KD	0	3.1
7/17: Attention to class list overlap analysis 3.2 KD	0	3.2

7/18: Review TT depo notice .1; emails with Mackey and analysis of payment issues, email to PWS re same .1;	.2	
7/19: Review Trotsky case and emails with DO re conflict motion .3; emails with Weeks n/c	.3	
7/19: Attention to class list overlap analysis 2.8 KD	0	2.8
7/20: Review Williams depo summary and Williams file materials on model, USGS documents on original model, prepare list of questions and issues re same 1.6; review and summary of numerous responses to Willis discovery .7; emails to PWS re expert bills motion .1; return phone calls to five CMs re settlement and class issues 1.2; complete review, analysis and summary of expert report and exhibits, cf with CM records and data spreadsheets 3.4	7.0	
7/20: Assist MM with review of expert report exhibits and data and compare with CM records and data, prepare summary of same 2.6 AH	0	2.6
7/21: Prepare for Williams meeting and review of prior report .8; travel to and attend Williams pretrial meeting 3.6; phone call with O Landsgaard .7; emails and call with CM Wheeler .4; emails and call with DO re same and Williams .2; review Reesdale records .1; phone call with client re expert report issues .4; review Willis opp to final approval motion .1;	6.3	
7/22: Phone call with DO re handling conflict motion, memo to file re status of related issues and arguments .8; emails with Olaf re settlement .1; legal research on conflicts issues in classes 2.7; review Kear report and email to TT re same .1; review and analysis of file materials and transcripts re discussions with Willis counsel and other counsel re class boundaries, review Willis order filings and orders re same, many emails with DO re same 3.7; emails to and from BBK re same .1; assessment of 128.5 sanctions, and brief research re same, email to DO re same .4; emails with LO counsel re sanctions motion .1; review and analysis of review Trotsky case .1; review of draft sanctions motion .2; phone call with client re case status and handling motions and prove up .7; emails with counsel re hearing transcripts .1; commence preparation of opposition brief on withdrawal motion 2.3; emails to RK re witness fees .1;	11.5	
7/22: Attention to class list overlap analysis 2.2` KD	0	2.2
7/23: Phone call with Tom Bunn re conflicts motion and trial, memo to file .7; phone call from DO re sanctions and withdrawal motions .4; emails with TB re Widermuth testimony .1; draft client declaration and emails to from same re same .2; emails with D40 and LO counsel re Willis conflict motion .3; phone call from client re expert and trial issues .4; many emails with DO re same .2; emails with DO re class overlap facts .2; emails with TB and MF re motion .1; review PWS draft opp to Willis motion .1; emails with counsel re TT depo .1; drafting of opposition to motion to withdraw, review KD overlap analysis, many hearing transcripts and evidence, drafting of MM decl. 7.9	10.7	

7/24: Phone call from client re Thompson and trial .2; review and analysis of court transcripts and attention to preparation of exhibits to MM declaration 1.3; review comments to PWS opp, emails with counsel re same .2; review model stipulation and emails with counsel re same .1; phone call with MF re class conflict facts .2; emails with D40 re Willis objections .2; emails with BW re expert bills .1; emails with Brumfield re settlement and discovery, emails with D40 re same .3; continue drafting opposition to motion to withdraw and MM decl., including legal research and review of RK cases, email to counsel re review and filing, and issues with same 5.2; analysis re motion to amend Willis J, review file materials, and long emails to DO re same .4; review trial stip and emails with counsel re same .1;	8.3	
7/25: Supplement and revise opp to withdrawal motion, MM declaration, and prep of add'l exhibits 2.1; email to counsel re same .1; prepare reply brief on motion for final approval 3.8; phone call with client re expert and trial issues .4	6.4	
7/26: Long email to TT re depo prep issues .4; complete draft of reply brief on final approval and email to counsel re same 1.7; emails to and from TT re deposition .1; edit and amend opp brief to motion to withdraw and MM decl 1.1; prepare for Thompson deposition 2.6; review Tapia RFP response and documents .2; emails with Franco re prep of trial exhibits and binders .2;	6.3	
7/27: Review and supplement reply on final approval brief .7; review PWS opp to withdrawal motion, and email to same and DO re re same .3; travel to and attend Thompson deposition 8.5; phone call with TB and review 8/08 transcript .8; review opp to motion to admit alt physical solution .1; analysis re McCarran issues with classes and email to US re same .2;	10.6	
7/28: Phone call with DO re handling withdrawal issues .4; review draft motion to amend Willis J .1; emails and call with Franco re trial exhibits and binders .2; emails with TB and MW .1; emails with DO re Willis motion PWS opp handling, review and analysis of relevant settlement provisions .5; email to counsel re LL settlement issues .2; review Desert Breeze clarification request and emails with Wilson .1;	1.6	
7/29: Prepare Wildermuth outline .7; emails with Wilson re settlement .1; conf call with settlement committee, memo to file .8; phone call with Wilson re settlement offer and trial .2; conf call with TB and Wildermuth re trial testimony, memo to file .6; emails with Wang and analysis re WFF status .3; review and analysis of Willis reply on motion to enforce .1; review and summary of TT depo transcript 3.6;	6.4	
7/30: Prepare outline for RAW direct and potential cross, review client documents .6; phone call from Wilson and emails to and from settlement committee re handling issues with same .2; emails with SC .1; return calls from 4 CMs re settlement 1.1; phone call with client re trial prep .8; phone call from Wang re class member, memo to file .1;	2.9	
7/31: Review and analysis of voluminous Willis objections to settlement and prepare summary memo re responses to same 4.8; complete summary of Thompson depo transcript .8; commence trial direct outline of TT .7;	6.3	
<b>TOTAL ATTORNEY HOURS</b>	<b>119.5</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>13.9</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: August 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
8/1: Complete review and summary of TT depo 1.8; review and analysis of Willis legal authorities and supplement memo re analysis of same, and contrary authority on treatment of dormant rights 3.3; emails and call to and from Wilson re LL settlement issues .3; emails with DO re MIL's .1; emails with client and DO re trial strategy and issues .3;	5.8	
8/2: Complete trial direct outline for TT, review and analysis of documents for use as Exhibits 3.1; phone call with client re preparation for trial testimony and cross .9; review and analysis of Phelan objections and 2013 settlement, prepare argument for same .9; emails with client and DO re trial issues, analysis re trial exhibits .6; emails with TT re outline and trial .2;	5.7	
8/3: Prepare for trial 2.1; review do over stip drafts, emails with LO counsel .1; travel to and attend meeting with DO and settlement prove up trial 8.9; review and analysis of Willis motion re prior settlement and other objections, prepare for oral argument 1.4;	12.5	
8/4: Prepare for prove up hearings 1.2; travel to and attend further prove up hearings, meeting with DO re handling Willis issues 4.0; review draft motion to amend Willis J, emails with DO re same .3; review draft email to RK re same, emails with DO, review LL stip .1;	5.6	
8/5: Phone call with client re status of trial and other issues .3; review drafts and revisions to trial stips, many emails with counsel re same .2; emails with DO re motion to amend .1; review Williams documents .2; emails with SC re LL settlement .1; emails with GSI and analysis re billing issues, email to BW re same .2;	1.1	
8/7: Emails and calls with WW, revise LL trial stip .3; emails with DO re motion to amend .1; review and analysis of Reesedale docs .1; return phone calls from 4 CMs re settlement and water issues 1.1;	1.6	
8/10: Phone call with settling parties re stipulation and trial issues 2.1; review revised trial stips, revisions to same, and numerous emails with counsel re same .3;	2.4	
8/11: Emails with counsel re settlement issues, review final trial stips .2;	.2	
8/12: Phone call with Wilson re various settlement issues, memo to file .3; email to settlement committee re handling several parties .1;	.4	

8/13: Review Minute orders, call to client .1;	.1	
8/14: Phone call from WW and emails with SC re LL settlement .3;	.3	
8/17: Review and analysis of Phelan trial brief and trial exhibits .6; phone call to Ailin re fees issues, memo to file .4; email to same re resolution proposal .1; review and analysis of D40 trial brief and email to WW re same .3; review of Phelan cross complaint .1; attend settling parties conf call, memo to file .8;	2.3	
8/18: Emails with WW and SC re settlement .2; review Willis reply brief .1	.3	
8/19: Analysis re White Fence claims, review of relevant pleading re same .4; phone call to WW re conflict issues and handling non-stipulators, memo to file .3; emails to and from settlement committee re: Wilson and handling non-stipulators .4; many (15+) emails with LO counsel re same .3; assessment of Robar claim and property history .5; review Wilson court filings on non-stipulators, email to same re settlement and conflict issues .5; emails with MD re WFF status and handling .2;	2.6	
8/20: Emails with DO re trial issues and RK motion .2; prepare for and attend settlement committee conf call 1.5; review and analysis of Willis reply brief and decl .4; phone call from DO re Willis motion .3; review Robar material and call to counsel .1; many emails with MF re Tapia settlement .2; review revised stipulations, AVEK memo and emails to and from McElhaney .3; emails to and from counsel re Tapia .1; emails to and from DO re Phelan trial issues and Willis motion .2; brief review of SP trial transcripts .2; review trial exhibit list .1;	3.6	
8/21: Review and analysis of SK trial exhibit list, and Tapia stipulation .2; emails to and from Biloti re Robar .2; review and revise Tapia stip, email to comm re changes .1; email to LO counsel re Tapia .2; phone call to Brumfield re Ritter .1; emails to and from WW and MF re WFF3 settlement .6; review of defaults and meeting with KD re analysis of same .1; emails with Brumfield re Tapia claim and settlement .2; phone call from Biloti .2; review and analysis of Phelan trial exhibits .6; review and analysis of protective orders and email to Biloti re same .3; call with DO re withdrawal motion .3; email to WW re Leisure Lake .2; emails to and from Brumfield and settlement comm re Tapia .3; phone call from GSI and attention to North Edwards issue, emails with KL .2; email to Biloti re timing issues .1; review trial filings of this day .1;	4.0	
8/24: Review and analysis of cases cited by Willis in reply brief 1.3; prepare for hearing on motion to withdraw 3.2; long email to JD, TB and Markman re hearing issues .4; phone call from Wilson re WFF .2; emails with counsel re GSI billing .2; review D40 RJN and trial brief, underlying records and Phelan brief .2; preparation for Phelan trial .8; analysis re default filings and conf with KD re analysis of same .4	6.7	
8/24: Review of Doe/Roe default filings for class members, preparation of summary of same 2.1; preparation of hearing and trial binders for MM 1.1 KD	0	3.2
8/25: Travel to and attend hearings on motion to withdraw and Phelan trial, including preparation for same 11.9;	11.9	
8/25: Review of Doe/Roe default filings for class members, preparation of summary of same 1.4 KD	0	1.4



8/26: Emails with RWalker re hearing order .1; long call with Bilotti re settlement and litigation issues 1.0; phone call to RK re settlement and trial issues, memo to file .4; many emails with Wilson re settlement issues .4; many emails with SC re settlement issues .3; return phone calls from three CMs re settlement and ownership issues .8	3.0	
8/26: Review of Doe/Roe default filings for class members, preparation of summary of same 2.1 KD	0	2.1
8/27: Phone call from L Quass re Leisure Lake .6; revise LL trial stip and email to same .2; phone call to S Kuney re settlement issues, memo to file, review stipulations .5; phone call with RK and L Brennan re settlement, memo to file re same .8; call and email to BB re Parris .1; call with RGK .2; many emails to and from LO counsel re Willis settlement .4; phone call from CM Schnaidt re settlement issues .5;	3.2	
8/27: Review of Doe/Roe default filings for class members, preparation of summary of same 2.0 KD	0	2.0
8/28: Many (20+) emails with RGK re Willis .3; phone call from Brunick re settlement and trial issues, memo to file .5; many (35+) emails with LO counsel re same .7; attend settling party conf call, and call with BB and Sanders re settlement issues 1.3; many emails (15+) with RK and LB re settlement .8; review and summary of Tapia depo transcript 2.7; review new defaults and emails with KD re same .2;	6.5	
8/31: Phone call from CM C Sevilla re settlement and class order correction .5; review and analysis re Mojave boundary area data and reports, email to counsel re Phelan claims .5; review and analysis of Tapia records .4; review Robar filing, email to LO counsel .1; emails with counsel re Phelan .1; prepare draft order of denial of Willis motion to withdraw, emails to counsel re same 1.5	3.1	
<b>TOTAL ATTORNEY HOURS</b>	<b>82.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>8.7</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: September 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
9/1: Emails with DO re motion to amend .1; emails with RK re same .1; review and analysis of proposed order from Brennan, and analysis and modification of proposed order for court on withdrawal motion .7; emails and phone call from GSI re billing issues, analysis re payment records .2; analysis re Robar claim and emails to and from counsel re same .4; preparation of MM declaration re expert work .5; analysis of expert billing issues, emails with GSI, and prepare ex parte application for approval .5; email to Brennen re order .1; emails to R Walker re hearing and order issues .1; review draft motion to amend judgment and emails with DO re same .4;	3.1	
9/2: Phone call from RK re judgment and settlement, memo to file .4; email to DO re same motion to amend .1; complete MM declaration re Thompson and email to DO .3; review Willis CMC stmt .1; return phone calls from two CMs re settlement .5;	1.4	
9/3: Phone call from Wilson re settlement .2; emails with RK re motion to amend and review of prior case filings re same .2; review Quass stip drafts .1; review filings of this date .1;	.6	
9/4: Phone call with DO re motion to amend, review same .2; attend settling parties conf call 1.0; prepare CMC stmt .2; review and revise motion to amend 1.2; emails to and from RK .1; attend status conf and memo to file re same .8; emails with RW re motion to amend .2; emails with LO counsel re trial issues .2; review trial filings of this date .2;	4.1	
9/8: Email to Quass re settlement issues .2; emails with BB re Willis settlement .1;	.3	
9/9: Review of court orders and transcript re 8/3 and 4 .1; phone call with Quass re prove up and case issues, memo to file .7; phone call from BB re Wagner and settlement, memo to file .1; emails with Quass re settlement and prove up for LL .4; analysis re prove up trial and prepare email to LO counsel re same .2; many (30+) emails with counsel re trial issues .7; emails with LB re discovery and settlement .1; email with JD and counsel re prove up issues .3; legal research re hearsay exceptions and declarations as well as EC 355 rulings 1.3;	3.9	

9/10: Many (15+) emails with LO counsel re trial issues .6; email to JD re stipulating parties .1; attend meet and confer conference re trial proof, memo to file re same 1.3; review and analysis of phase 4 transcripts and orders re evidence issues .6; emails with GSI and analysis of billing issues .1; prepare long memo to all counsel re prove up evidence, review transcripts, emails with DO and counsel, revise memo 1.2; attend Wagner deposition 3.1; emails with MD re prove up issues .1; conference call with setting parties re settlement and trial issues 3.1;	10.2	
9/11: Call with Kuney re expert issues .2; call with Jeff Dunn re trial issues .6; emails with LO counsel re do over .1; phone call with Brunick re trial and Willis .4; phone call to RK and emails with LB re trial .2; review and analysis of Willis settlement proposal, emails with BB re comments to same .4; emails with JD .1; review and analysis of settling parties revisions to CMO and joint statement, court orders relevant to phase 4 evidence .4; emails to and from DO re Willis motion, settlement, and trial issues .3; long email to LO counsel re evidence issues .3; many (25+) emails from LO counsel re trial issues .6; conf call with LO parties and JD re prove up issues, memo to file 2.4;	6.0	
9/11: Review of Doe/Roe default filings for class members, preparation of summary of same 2.9 KD	0	2.9
9/14: Email to KD re default analysis .1; many (15+) emails with counsel re trial issues .6; emails with SC re LL settlement .2; emails with Casey re trial .2	1.1	
9/14: Review of Doe/Roe default filings for class members, preparation of summary of same 1.5 KD	0	1.5
9/15: Emails to Casey and Bezerra re trial .1; participate in settling party conference call 1.4; review and analysis of trial stipulations, phone call to SK re trial stipulations .3; phone call with LB and RK re trial issues, memo to file .5; call with settlement counsel and Parris re Willis deal .5; email to counsel re Willis issues .1; phone call with DO re prove up .3; analysis re landowner witnesses .2; review witness list and email to JD re same .1; emails with SC re LL settlement .1; receive and review Willis writ .4; review D40 objections to Willis orders, emails with DO re same .1; review D40 opp and review and sign final do over stip .1; emails with LB re trial stips .1; emails with LO counsel re same .1	4.4	
9/15: Review of Doe/Roe default filings for class members, preparation of summary of same 2.0 KD	0	2.0

9/16: Review of Williams pumping assumptions, analysis or expert report for Class and summary expert report re same .3; review and analysis of joint CMC and CMO drafts, various redlines to same and email comments of counsel, and long email to counsel re comments to same .8; phone call with RGK re trial issues, email to DO re same .3; emails with RW re trial exhibits, email to counsel re same .1; call from Walter Wilson re trial issues for WFF and Desert Breeze, court expert .4; review of Tapia records .1; analysis re WFF3 claim and email to settlement comm re same .2; emails to and from Quass re trial .1; review and analysis of revised Willis proposal and relevant Judgment provisions, and prepare comments to same .5; return calls to two CMs re settlement and membership issues .5; review of 5/28/13 transcript, decls. in lieu of trial and emails with DO re evidence issues .4; review and analysis of AV mutual declarations for trial, cf. with prior discovery summaries .5; review of expert payment materials and emails with Mackey re same .1; review Willis opp to motion to amend and email with DO re response issues .2; review Wilson email and email to Quass re trial exhibits .1; emails to SC re WFF .1;	4.7	
9/16: Review of Doe/Roe default filings for class members, preparation of summary of same 1.6 KD	0	1.6
9/17: Review and analysis of expert stip and email to counsel re same .1; review of new CMO and joint CMC statement, numerous emails from counsel re same, e-mail to counsel re comments .4; review MD return flow analysis, emails with settlement committee and BB re same .2; phone call from Quass re trial issues .2; emails with SK re settlement issues .1; review settlement comm emails, Wilson emails and corr and prepare email to same re return flows .4; review newly filed declarations and exhibits .1; emails to KD re default project .1; review of trial stipulations and proposed physical solution judgment, and prepare and revise long email to settling counsel re handling same and status .6; legal research on phased trials, evidence issues, EC 355 1.0; draft and revise CMC statement, review trial transcripts for same 1.5; email to DO re Willis proposal .1; emails with LO counsel re conf call issues .1; review new defaults, email to KD re same .1; emails with MD re WFF .1;	5.1	
9/17: Review of Doe/Roe default filings for class members, preparation of summary of same 2.1 KD	0	2.1
9/18: Phone call from Cal Stead re trial and settlement issues, emails with same re Willis .4; emails with SC re Stead .1; emails with counsel and review CMC stmts .1; conference call with settling parties re Willis settlement, discovery and trial issues 1.5; emails to and from LB re Thompson .2; letter from LB, many emails (15+) with LB and JD re TT further discovery, review expert corr and other records re same .8; emails with DO re handling TT discovery .1; prepare ex parte and proposed order re Barrel Springs, review prior filings .4;	3.6	
9/18: Review of Doe/Roe default filings for class members, preparation of summary of same 2.4 KD	0	2.4
9/20: Review Willis CMC stmts .1; review of PWS exhibits, emails to AH re trial binders .6;	.7	

9/21: Attend status conference, memo to file .9; email to new stipulators .3; phone call from Coldren re stip and trial issues .4; review of PWS trial exhibits, emails with AH re same .7; review US And Willis CMC stmts .1; emails with KD re defaults .1; emails with SC re LL settlement .1; emails with Mackey and KD re expert payments, review billings .1; emails to and from SK re settlements n/c	2.7	
9/21: Review of Doe/Roe default filings for class members, preparation of summary of same 1.0 KD	0	1.0
9/22: Review of PWS new exhibits, emails to AH re same .4; emails with counsel and DO re writ .1; review and analysis of Willis counter proposal, cf with prior offers, prepare summary of same .5; review and analysis of LO trial filings of this date, email to AH re same .4; review of Willis trial briefs and legal research on authority cited .7; review PWS trial brief .2;	2.3	
9/22: Attention to preparation of trial binders, summary of PWS trial exhibits 6.5	0	6.5
9/23: phone call from Wilson re settlement issues .2; review BB Willis memo and emails with counsel re same .1; attend Williams depo 2.2; review trial filings of this date .1; review Wilson draft trial decl, call to same .1; review new trial exhibits, email to AH re same .3;	3.0	
9/24: phone call from Wilson re AV Mobile decl .2; review new PWS exhibits, email to AH re same .9; review trial filings of this date .4; call in to Beeby depo .7;	2.2	
9/24: Summarize Tapia depo and exhibits 4.6; attention to preparation of trial exhibit binders 3.7 AH	0	8.3
9/25: Phone call from CM Kalpakoff re trial and class issues .6; emails to and from Wood .2; review Willis settlement docs .1; participate in settlement conf call 1.0; attend Binder deposition, memo to file re same 1.9; emails to BB re trial stips, review and sign same .1; emails with client re trial and settlement issues .5; email to LB re SP settlement provisions, emails with counsel re same .2; emails with DO re trial issues .1; emails with DO and LO counsel re Willis settlement and meeting re same .3; review and analysis of trial filings of this date .5; review new Willis terms and emails with counsel re same .1; emails with JD and LO counsel re Willis settlement .1;	5.7	
9/25: Review of Doe/Roe default filings for class members, preparation of summary of same 3.2 KD	0	3.2
9/26: Emails with LO counsel re Willis and trial issues .2; prepare cross exam outline for Tapia .9; review trial binders .1;	1.2	
9/26: Attention to preparation of trial exhibit binders 3.4; prepare Willis settlement binder and summary .6 AH	0	4.0
9/27: Phone call with RGK and long email to TC re Lane issues .4; emails with US re Willis .2; review BB trial memo .1; analysis of Willis class term memo .1;	.8	
9/28: Emails with counsel re Robar .1; travel to and attend settlement meeting with Willis and phase 6 trial, meeting with counsel 10.2; review of motion to amend judgment and caselaw, and prepare for hearing .8; review new trial exhibits and trial filings of this date .6; emails with DO re trial .1;	11.8	

<b>9/29: Travel to and attend trial, meetings with counsel 10.9; review trial docs filed this date .4; review of Williams depo transcript .6;</b>	<b>11.9</b>	
<b>9/29: Review of Doe/Roe default filings for class members, preparation of summary of same 1.4 KD</b>	<b>0</b>	<b>1.4</b>
<b>9/30: Travel to and attend trial, meeting this LO counsel 10.0; review trial filings of this date .2</b>	<b>10.2</b>	
<b>2; 9/30: Review of Doe/Roe default filings for class members, preparation of summary of same 1.8 KD</b>	<b>0</b>	<b>1.8</b>
<b>TOTAL ATTORNEY HOURS</b>	<b>101</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>38.7</b>

# Law Office of Michael D. McLachlan, APC

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

# INVOICE

DATE: October 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
10/1: Emails with DO re trial .1; emails with Quass re trial .2; analysis re Annex evidence, email to DE re same .3; prepare for Willis objection argument 2.2; travel to and attend trial 4.6; many (20+) emails with counsel re trial issues .3; review trial filings of this date .1;	7.8	
10/2: travel to and attend trial, meeting with counsel 5.1; review Wills depo notice, emails with counsel re same .1; emails with BB re Willis settlement .3; review and analysis of Binder material .2	5.7	
10/3: Review and analysis of Willis changes to Judgment, emails to counsel re same .4;	.4	
10/4: Review and analysis of Phase 4 discovery, and related orders .5;	.5	
10/5: Participate in D40 conf call, memo to file re same 1.1; review and analysis of draft Willis agreement, prepare comments to same, and emails to and from counsel re same .9; emails with BB re Willis .2; emails with client re Willis issues .2; review new Willis memo and terms .1; emails with counsel re Tapia .1;	2.6	
10/6: Phone call from client .3; emails to and from same re Willis issues .2; review and analysis of Estrada materials and prepare cross of same .8; emails with BB re Tapia .1; review Willis brief and trial filings of this date .2; emails with client re Estrada parcels .2; analysis re expert billing and emails with counsel re same .1;	1.9	
10/6: Review of Roe default filings for class members, preparation of summary of same 2.0 KD	0	2.0
10/7: Attend telephonic status conf, email to DO re same .8; phone call from Sloan re Willis .2; phone call from MF re Willis and judgment issues .4; many (20+) emails with counsel re trial issues and settlements .3;	1.7	
10/7: Review of Roe default filings for class members, preparation of summary of same 1.5 KD	0	1.5
10/8: Emails with Quass .1; attend settlement meeting, memo to file re same 3.5; email to LO counsel re Willis strategy .2;	3.8	

10/8: Review of Roe default filings for class members, preparation of summary of same 1.6 KD	0	1.6
10/9: Review and sign PO .1; emails with SC re settlement issues .2; emails with counsel re trial and settlement issues .2	.5	
10/7: Review of Roe default filings for class members, preparation of summary of same 3.0 KD	0	3.0
10/11: Review and summary of Roach transcript 2.1; review and summary of Kear transcript 2.5;	4.6	
10/12: Emails with counsel re settlement .1; phone call with RK re and emails with same .3; review of Robar decls. and email to Biloti re same .3; review and summary of Smith transcript 3.5; attend trial strategy conf call .6;	4.8	
10/12: Review of Roe default filings for class members, preparation of summary of same 1.4 KD	0	1.4
10/13: Emails to counsel re handling Robar .1; review and analysis of minute orders, Willis counsel corr., and expert discovery .2; phone call from client re trial and appeal issues .6; prepare cross exam questions for Smith .8; phone call from TT and email to JD and MF re same .3; prepare cross for Roach, and review of applicable appraisal guidelines for same 1.0; review filings and evidence on export issue, and prior discovery on relevant witnesses .3; review and analysis of AVEK exhibits .2; emails to KD re defaults, review summary .1; review trial filings of this date .1; emails with JD re evidence .1; review and analysis of new Willis class alt phys solution, email to DO .3;	4.1	
10/13: Complete review of Roe default filings for class members, preparation of summary of same 1.9 KD	0	1.9
10/14: Travel to and attend trial 9.7; review of trial filings of this date .1; emails with counsel re trial issues .1; phone call to DO re trial .1;	10.0	
10/15: Emails with KB re settlement .1; review default summary .2; emails with DO re trial .2; review Robar material, emails with counsel .1;	.6	
10/16: Conf with KD re AGWA project and cost review .2; review and analysis of Robar documents, emails with counsel re same .2; review and analysis re closing order, phone calls with counsel re handling same .4;	.8	
10/16: Review and analysis of AV cost and expense summary and backup 4.1 KD	0	4.1
10/19: Emails with SC re WFF, call and emails with Wilson re same .5;	.5	
10/19: Complete case cost analysis and summary 1.4 KD	0	1.4
10/20: Review and analysis of WFF3 records .1; phone call with Lenton re WFF3 claim and settlement .6; emails with BB re same .1; phone all with DO re trial and closing issues .5; phone call with RGK and memo to file .5; long email to counsel re closing .2; email to RW re motion to amend, review LASC docket re same .1; emails with counsel re closing issues .3;	2.4	



10/21: Phone call with BB re settlement and judgment issues, WFF3 .5; phone call with JD re SoD, email to DO re same .2; emails to counsel re SoD .2; emails to and from counsel re SoD issues and conf call .3; phone call with RGK and JD re closing and settlement issues, memo to file 1.2; emails with Biloti re Robar claim .3; many (20+) emails with closing and trial issues .5; email to SC re WFF, call to Lenton .3;	3.5	
10/21: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 2.0 KD	0	2.0
10/22: Review GSI invoice and billing .1; emails with SC re WFF .1; review Clifton decls, and emails with counsel .1;	.3	
10/22: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 2.1 KD	0	2.1
10/23: Legal research on SoD issues, email with DO re same .7; participate in settling parties conf call re trial issues 1.3; emails with counsel re closing and trial issues .3; return phone calls to three CMs re settlement issues .8;	3.1	
10/23: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 4.5 KD	0	4.5
10/26: Email to Mackey re expert payments .1; email to Lenton re settlement .4; emails with SC re Robar .2; emails with counsel and RK re closing .2;	.9	
10/27: Many (15+) emails with SC and MD re settlement issues .3; phone call with client re status and closing issues .5; phone call from CM Jackson .3;	1.1	
10/27: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 2.0 KD	0	2.0
10/28: Many emails (15+), and calls with counsel re Robar, settlement and closing .8; prepare outline of closing points .4	1.2	
10/28: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 2.2 KD	0	2.2
10/29: Prepare draft declaration for DZ, review and analysis of record for same 1.4; prepare summary email to DZ re same .8; email to RW re orders .1; emails with DO re DZ decl. .2;	2.5	
10/29: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 2.5 KD	0	2.5

10/30: Attend telephonic conference .8; many emails with Lenton re settlement .3; emails with counsel re WFF .1; review and revise DZ declaration, emails with same .4; phone call with RGK re Ritter, memo to file re same .7; phone call with Lenton re WFF3 claim .3; review court filings and analysis of Ritter claim, filings and related issues .7; prepare stip for WFF3 .4; phone call with Brady re Ritter, memo to file .6; emails to and from Lenton re claim and hearing issues .2; draft email to MF re Ritter, review of stip .3; return phone calls of three CMs re trial and rights issues 1.1; many emails with counsel re closing .5; emails with SC re Tapia settlement .2; emails with Quass, call from same .3; review MO and email with DO re same .1; emails with Lenton re settlement issues, call from same .4; emails with LO counsel re settlements and closing .2;	7.6	
10/30: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 5.3 KD	0	5.3
10/31: Review and analysis of AGWA filings, public record search re Ritter Ranch, review and assessment of Juniper Hills and White Fence representation 2.6; email to DO re Ritter .1; phone call and emails to KD re project on AGWA analysis .2; emails with RGK re Ritter .1	3.0	
10/31: Review and analysis of historical AGWA client filings and preparation of spreadsheet summarizing client status over time 4.0 KD	0	4.0
TOTAL ATTORNEY HOURS	75.9	
TOTAL PARALEGAL HOURS		41.5

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: November 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
11/1: Analysis and drafting of Objection to Ritter claim, review and analysis of preliminary spreadsheet from KD 1.3; emails to KD re further work on AGWA analysis .2; drafting of Ritter objection, including analysis of relevant filings 1.3; emails with MF re Ritter .3; analysis re judgment and emails with counsel re non appearing parties problem .4; emails with KD re AGWA project, review current spreadsheet .2; emails with counsel re class issues .2; emails with RGK re Ritter .1;	4.0	
11/1: Analysis re AGWA client history and preparation of spreadsheet re same 5.5 KD	0	5.5
11/2: Phone call with RGK re Ritter and handling of other no-show clients an related issues, memo to file .6; phone call to Brumfield re Ritter and Tapia claims .3; emails with LO counsel re same .1; meeting with CMs 1.1; review docket entries for Ritter, emails with BBK re Ritter service .3; prepare draft Lendon decl, review filings and notes, revise same .6; emails with TB re non appearing parties .1; emails with MF re Ritter and other dropped parties .1; phone call with DO re closing and post trial motions .4; phone call with Lenton re decl .3; phone all with RK re Ritter and other AWOL parties motion and judgment issues .4; revise and finalize Lenton decl .2; phone call from Brady re stipulation and judgment, memo to file re Ritter claim .5; emails with Lenton re trial issues .1; emails to sett. Comm re WFF issues .1; public records search for Ritter property, email to Brady re Ritter property location .2; emails to and from Lenton re claim and decl .1; review and analysis of initial AGWA analysis, meeting with KD and emails with LO counsel re same .6; emails to LO re Lenton and Ritter .1; drafting and revision of objection to Ritter claim and MM decl. re same, analysis re underlying records and exhibits for same and AGWA spreadsheet 7.6;	13.8	
11/2: Analysis of JCCP 4408 answering party status and preparation of summary database for same, emails to MM 8.9 KD	0	8.9
11/3: Emails to Brady and client re Ritter and closing .1; email to KD re answering party analysis .2; emails with counsel re AGWA and non-appearing party issues .3; prepare for closing arguments 2.9; travel to and prepare for closing arguments, attend closing arguments 6.5; attend meeting with LO counsel re closing strategy and dealing with judgment issues 2.4; review and revise closing outline .6; review Willis objections to prescription claim .2;	13.2	

11/3: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 2.0 KD	0	2.0
11/4: Review and analysis of new revised Willis physical solution .4; review and analysis of answering party spreadsheet and email to counsel re same .2; work on closing details, draft final version 1.1; meeting with RGK re closing outline and judgment issues, Ritter .8; travel to and attend closing arguments, meeting with DO re judgment, class issues and non-appearing parties motion, review judgment and outline of SoD draft 13.6;	16.1	
11/4: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 2.5 KD	0	2.5
11/5: Emails with Stead re closing .1; review Ritter stip, emails with Brady .1; emails with counsel re cost memo as to Tapia and Phelan .3; review historical summaries of parties, emails to Wang re list of Does and Roes, email to KD re same .2; emails with LO counsel re SoD and prevailing parties .2; review of AGWA list and prepare memo re changes to same .5; brief research on AGWA party lands .3; legal research on 410.50 and 1014 and appearance law .9; long email to counsel re motion for judgment .3; emails with MF re AGWA list .2; emails with JD and attend conf call with settling parties, memo to file, outline SoD .8; email to DZ re decl .1;	4.0	
11/5: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 2.9 KD	0	2.9
11/6: Review and analysis of preliminary list of potential default target parties and conferences with KD re further work on same 1.4; phone call with S Kuney re motion and defaults, memo to file .3; review and analysis of revised target list, analysis of underlying parties, modify Fife and non-Fife lists and review of some underlying documents for same 1.7; email to settling party counsel re handling and review of list .4; emails to and from counsel re Request for Judgment, review of Judgment and class list for same .6; participate in setting parties conf call, memo to file .8; review revised answering party analysis and modify same, email to KD re further work on same .8; emails with counsel re party status issues .2;	6.2	
11/6: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 4.9 KD	0	4.9
11/7: Review and analysis of answer party spreadsheet and prepare list of modifications to same, memo re further work, spot check underlying date sources for accuracy 1.7; emails with counsel re party status issues .2;	1.9	
11/7: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 2.0 KD	0	2.0
11/8: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 3.5 KD	0	3.5

11/9: Review and analysis of Ritter filings, review CMC, many (20+) emails to and from Brumfield re issues with same 1.6; review of modified answering party analysis run against class database, spot check underlying data, email to KD re further work .9; emails with counsel re timing on motion for judgment .1; research on public records related to Ritter property and Trust, search of LASC court docket for relevant filings .9; emails with counsel re party status and motion for judgment .2; long email to counsel re Ritter claim and filings .4; phone call to WW re defaults and Request issues .3; phone call from CMS re judgment issues, review judgment re same, memo to file .6; phone call from J Kalpakoff .6; review real property and public records re same, and email to settling party counsel re lack of service on same .8; emails with and phone call to Lewis re non-appearing parties status .2; review and analysis of Santa Maria Judgment .2; review of proposed stip from Brady re LV Ritter and email to committee re handling same .3; review judgment draft and analysis re handling same .3; phone call with DO re judgment issues .3; emails with SC and Brady re LV Ritter stip .2; many emails with counsel re handling Ritter claim .3;	8.2	
11/9: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 3.0 KD	0	3.0
11/10: Emails with TB re judgment request and strategy .3; emails with KD re Doe and Roe analysis .1; phone call from Bunn re Ritter / Fife issues .4; phone call with Fife .2; review SoD transcript .1; participate in AV counsel call .1; email to JD and MF re Ritter and conf call .2; emails to TB re Fife .1; phone call from BJ re Ritter and judgment .3; attend telephonic status conf, memo to file .5; meeting with KD re Doe project .3; analysis re Ex 1 and emails with counsel re issues with same .2; emails with client re status and judgment .3; emails with counsel re answering party issues .2; emails with Wang re Does and Roes .1; emails with and call from Lenton re settlement .2;	3.6	
11/10: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 2.1 KD	0	2.1
11/11: Email to LO counsel re Doe and Roe accounting analysis and revise memo re same .5; meeting with KD re Doe project .2; review and analysis re case docket and minute orders for trial re SoD .4; phone call to RK and email to RW re missing orders .3; review Williams exhibits .2; emails with KD re Roe project .1; emails with Brady and SC re AV Ritter stip, review same .2; review and analysis of final AGWA member analysis, check underlying records and modify same .7; email to LO counsel re same .2;	2.8	
11/11: Assist MM in docket search for missing orders .4; analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 3.7 KD	0	4.1
11/12: Review LV Ritter stip, judgment, and emails with committee .2; email to Brady re stip status issues .1; review and analysis of final KD version of AGWA analysis spreadsheet, review underlying source materials and prepare instructions for finalizing same 1.4; email to LO counsel re same and handling multiple capacity parties and trusts .2; conf with KD re handling Doe project, review preliminary work on same .2; call and emails with RK .1;	2.2	

11/13: Review and analysis of Willis Class request for SoD .2; review of current Doe analysis spreadsheet, spot check underlying records and emails with KD re same .6; return phone calls to four CMs re settlement and membership issues 1.1	1.9	
11/13: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 6.5 KD	0	6.5
11/15: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 2.1 KD	0	2.1
11/16: Phone call from class member Houdeki .3; review and analysis of current draft Doe checklist, underlying docket and file materials, SP class list and Willis list re unserved defendants 2.7; public records search of numerous class members and unserved landowners 1.1; prepare long email to LO counsel re preliminary analysis and issues with unserved defendants .7; complete review of draft Doe analysis and email to KD re comments and changes to same .9;	5.7	
11/16: Analysis of JCCP 4408 answering party and Roe status and preparation of summary database for same, supplement AGWA summary 3.0 KD	0	3.0
11/17: Emails with KD re changes to Doe analysis and review same .4; emails with BB re Willis .1;	.5	
11/17: Analysis answering party and Roe status and preparation of summary database for same for motion for judgment 2.0 KD	0	2.0
11/18: Meeting with KD re Roe project issues .4; phone call to RK re judgment issues, memo to file .4; research on motion for judgment issues .7; preparation and revision of dismissal and MM declaration, review of file materials, emails to DO re same 1.3; review of Robar evidence .1; emails with JD re SoD .1; emails with DO re fee motion and appeal .2; review and analysis of class list and emails with counsel re issues with same .4;	3.6	
11/18: Analysis answering party and Roe status and preparation of summary database for same for motion for judgment 1.9 KD	0	1.9
11/19: Emails with counsel re party status issues .3; review of original file in Dept 1 re dismissals and defaults, memo to file .5; return phone calls to 4 CMs re settlement issues 1.0	1.8	
11/19: Analysis answering party and Roe status and preparation of summary database for same for motion for judgment 1.5 KD	0	1.5
11/20: Emails with SK re Van Dam status .1; review revised Roe analysis, spot check underlying documents, and emails with KD re same .6; review emails re SoD n/c	.7	
11/20: Analysis answering party and Roe status and preparation of summary database for same for motion for judgment 4.0 KD	0	4.0
11/21: Analysis answering party and Roe status and preparation of summary database for same for motion for judgment 2.0 KD	0	2.0
11/22: Emails with client re Willis and status .2;	.2	

<b>11/22: Complete analysis answering party and Roe status and preparation of summary database for same for motion for judgment, conf with MM re same 2.0 KD</b>	<b>0</b>	<b>2.0</b>
<b>11/23: Phone call with client .2; review and markup of SoD draft .8; emails with LO counsel re same .1; review of closing transcripts .5; review and analysis of current Roe analysis, underlying records, and long email to LO counsel re same .9;</b>	<b>2.5</b>	
<b>11/24: Call from RGK re SoD .2; emails with counsel re same .2;</b>	<b>.4</b>	
<b>11/25: Phone call from BB re Willis and SoD .2; review revisions to SoD .4; emails with counsel re same .1;</b>	<b>.7</b>	
<b>11/27: Attend settling counsel call on SoD issues .7; analysis of KD spreadsheets on non-defaulted parties, email to Wang re same .7; review further changes to draft SoD .3;</b>	<b>1.7</b>	
<b>11/29: Emails with BB re SoD .1;</b>	<b>.1</b>	
<b>11/30: Review further comments to SoD draft .2; attend settling parties call re SoD issues .9; markup SoD re SP class and email to counsel re same .5; review of US comments and revised language .1; conf call with settling parties .1; emails with LO counsel .1; conf call with LO counsel re SoD issues .8; status email to TT .1; emails with GSI, analysis re billing issues, and emails with PWS re same .3; emails with LO counsel re SoD issues .2;</b>	<b>3.3</b>	
<b>TOTAL ATTORNEY HOURS</b>	<b>99.1</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>66.4</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: December 2015

**Bill To:**

Wood v. Los Angeles County Waterworks et al.

**For:**

Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	PARALEGAL
12/1: Emails with LQ re SoD .2; phone call from Wilson .1; many (20+) emails with counsel re SoD changes, review revisions to same .5; attend settling party conf call re SoD 1.3; phone call from Quass re SoD .1; legal research on 631.8 and judgment against not appearing parties, and bounds and impact of general appearance on same 1.6;	3.8	
12/2: Review new draft SoD, emails with JD re changes to same .2; emails with counsel re SoD .2; attend landowner conf call re SOD 1.5; attend settling party call and then continued LO call re SoD issues 1.3; phone call from L Quass re SoD issues .3; review Quass changes .1; analysis of Does/Roes spreadsheet re failure of service, email to Wang re same .9; drafting of request for judgment facts .6; analysis re Ex A and email to counsel re same .1; email to counsel re appearing party analysis for request for judgment .2; emails with counsel re non appearing party information, analysis re same .5;	5.9	
12/3: Emails with LO counsel re SoD changes .3; review of LM and SK changes to same, many emails with counsel re further changes to SoD .8; review and analysis of party data, paralegal Workproduct, file material, and BBK comments and email to all counsel re appearing party issues 1.1; email to counsel re appearing party spreadsheet .1; emails with Quass and LO counsel re Goodyork, review his property summary .2; review JG and other counsel further changes to SoD .3; review DO draft judgment .1; phone call from CM Rogers re settlement issues .3; many emails with MF, review judgment list .3; review new LM draft SoD corrections .2; review SK insert for new stipulators .1; review US comments and email to counsel .1; review WW email and comments .1; emails with Brady and counsel re Gaskell .1; review new SoD insert .1; conf call with setting parties re SoD .2; brief review of revised SoD redline, emails with counsel re same .4; conf call with counsel re SoD .2; conf call with LO counsel re status of new changes to SoD .4; review LM new draft of SoD .1; review of Robar materials and emails with counsel re same .2; many (25+) emails with counsel re appearing party issues and request for judgment .5; emails with SC and analysis of Robar claim .2; many emails with counsel re SoD and judgment issues .2; review and markup proposed judgment .1;	6.7	



12/4: Review Quass changes to SoD .2; compare new Dunn version against LO, MM comments .2; review and analysis of numerous other requested SoD changes .2; review and analysis of CCP and CRC re judgment issues .1; review of Boron filings re prescription claim, emails with counsel re same .3; review of FPPC opinion letter and GC re conflict .1; emails with DO re judgment .1; review and analysis of master judgment and email to counsel re same .2; emails with settlement comm re Robar, review expert analysis and prior offer .2; emails and phone call with Wilson re SoD .2; review US edits to SoD .1; conf call with setting parties re SoD and judgment 1.5; drafting and analysis of SP judgment 1.5; review and analysis of non-appearing party list, and related work product, emails with counsel re same .6; review and analysis of class list and conf with DK re same, email to counsel re same .8; phone call from A Brady n/c; call from L Houdiqui .1; emails phone call from T Bunn and DE re fees issues .2; emails to and from WW re non-appearing list, analysis re same and CM status .6; review and revision of SP class judgment, exhibit, master judgment and comments to same 1.2; review of revised judgment, further comments to same .2; review of proposed judgment filed and exhibits, email to counsel re error .2; many (30+) emails with counsel re SoD and judgment .5;	9.3	
12/5: Emails with client re SoD and J .2; emails with counsel re Robar settlement .2; review master judgment, and email to counsel re defects .2;	.6	
12/7: Emails to and from SK re judgment issues .2; review and analysis of paralegal work-product, underlying filings, and master party spreadsheet for non-appearing parties, prepare instructions for final edits to same .9; legal research on general appearance issues and law for attorney binding clients, as well as form of notice required to non-appearing parties prior to trial 1.0; complete drafting of MM declaration and request for judgment, edit same 2.7; email to counsel re draft motion .1; emails with Wang re answers .1;	5.0	
12/8: Phone call to SK re judgment issues, memo to file .3; emails with KD re billing .1; emails with GSI and counsel re open billing .2; emails with DO re fee motion .1; status email to Pearl .1; phone call to JD n/c;	.8	
12/9: Emails with R Pearl re fee issues .4; review of court transcripts re judgment issues .4; emails to and from counsel re request for judgment, review timing and related orders, research on 1013, and modify request 2.1; prepare objection to master judgment, review trial transcripts for same 1.6; phone call with R Pearl, memo to file .7; analysis of docket, CCP 594 and email to counsel re notice of trial .6; emails with counsel re same .2; emails with RK re decl of DZ .2; modify exhibits and motion, mm decl ISO request for judgment 1.1; emails with Mackey re billing issues .1;	7.4	
12/10: Review Tapia filing .1; review Ritter filing, prior Ritter filing, and email to counsel re further handling of claim .3; emails with DZ re decl., revise same .1; emails with RK re fee motion .1; emails with DO re Ritter .1; review outline of Pearl decl., emails with DO re fee motion .3; emails with counsel re Robar settlement .1;	1.1	
12/11: Emails with DO re fee motion issues .3; email to RK re same .1; emails to Pearl re motion facts .5; review DZ decl, emails with same and DO .1; many emails with counsel re Robar settlement, review draft docs re same .2;	1.2	

12/13: Review default list, underlying records and class list, and email to KD re further work on same 1.1; emails with Davis re Abbey .1; review of cost summary and email to KD re same .2;	1.4	
12/14: Review and summarize Phelan objections and SoD .3; review and summary of Willis objections to same, emails with LO counsel re same .5;	.8	
12/14: Recheck default analysis spreadsheet 1.1 KD	0	1.1
12/15: Review and analysis of Willis objections .9; phone call with RGK re objections to SoD and handling same, email to counsel re call to discuss handling .7; conf with DK and review of class default lists, supporting file materials re class member erroneously defaulted 1.6; modify default exhibit, email to WW re same .2; emails with RGK and Quass re objections .1; review and analysis of Boron filings and discovery, long email to settling counsel and issues with prescriptive claims 1.5; emails with settling counsel re conf call on SoD objections .1; review expert billings and invoice approval filings, prepare ex parte application re #6 .2; emails with TB re Boron .1;	5.4	
12/15: Recheck default analysis spreadsheet 2.5; review cost summary and backup .5 KD	0	3.0
12/16: Emails with Mackey and counsel re payment issues .1; emails with counsel re SoD and Robar .2; prepare reply to Ritter objection to request for judgment, modify MM decl ISO same .9;	1.2	
12/17: Prepare notice re defaults .3; phone call from B Joyce re Ritter and SoD issues .2; emails with GSI re payment issues .1; review Willis memo from LM and email to same .2;	.8	
12/18: Email to KD re order analysis .1; emails with MD re Robar .1; analysis re class list for judgment and prepare notice of amended class list .8; prepare notice of service of trial orders .1; phone call from RK re judgment issues .2; review objections to SoD .3; participate in stip parties conf call re SoD and Judgment issues, hearing strategy 1.3; emails with SC re Robar deal, review docs .1; review GCG bill, emails with Penny re same .1; review revised SoD .1;	3.2	
12/21: Review LM and AG revisions to SoD, emails with counsel re same .2; participate in settling parties conf call re judgment and SoD changes, modify judgment .7; many emails with BBK re judgment, review and redline same .4; emails with counsel re judgment and SoD .2; emails with DO re same .1; review Willis supp objections and new judgment filing .2;	1.8	
12/22: Review Willis objections and Adiar filings .1; prepare for hearings .6;	.7	
12/23: Travel to and attend hearing on SoD, judgment, and other issues 3.8; review new judgment and exhibits, emails with Wang re same .3;	4.1	
12/24: Emails to and from Wang, modify exhibit .2; prepare proposed order re request for judgment .2; emails with counsel re Robar .1;	.5	
12/28: Review filings of this date .1; emails with MD re stip handling .1; emails with counsel re physical sol .1; email to Pearl re status .1; emails with GSI and counsel re payment issues .1;	.5	

12/29: Emails to and from LO and Davis re Robar ; phone call to Davis re proof on Robar claim, memo to file .4; review Willis objections .1; emails with counsel re Robar hearing .1; email to Biloti re prove up .1; review Lane filing and emails with counsel re same .1;	.8	
12/30: Phone call with RK re Robar and hearing issues, memo to file .3; phone call from Olaf, email to same .1; emails to RK re fee motion .1; long email to Biloti re prove up .4;	.9	
12/31: Email to JD re GCG, review prior corr .1; legal research on fee motion timing issues, and [REDACTED] of 1021.5 fee claim .9	1.0	
<b>TOTAL ATTORNEY HOURS</b>	<b>64.9</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>4.1</b>

# Law Office of Michael D. McLachlan, APC

# INVOICE

44 Hermosa Avenue  
Hermosa Beach, CA 90254  
Phone 310.954.8271 Fax 310.954.8271

DATE: January 2016

**Bill To:**  
Wood v. Los Angeles County Waterworks et al.

**For:**  
Legal services, Antelope Valley Groundwater Cases

DESCRIPTION	HOURS	AMOUNT
1/1: Email to Pearl re status of fee motion .2; emails with client re same and watermaster meeting .2; emails with LO counsel re watermaster meeting .2; review AV Press article and email with client re same .1; analysis re fee motion allocation and long email with DO re handling same .4; review prior hearing transcripts and email with counsel re same .2; emails with DO re fee motion issues .2; emails with LO counsel re watermaster timing .1; emails with GSI re billing issues .1;	1.7	
1/2: Return calls to six CMs re settlement issues 1.3; emails with RGK re watermaster .1;	1.4	
1/3: Emails with BB and Mackey .1;	.1	
1/4: Call from VM Godde and review database re property history .2; emails with DO re fee motion .2; phone call from CM Godde re settlement and class issues, update master client memo re same .6; emails and call with client re fee motion, review client records .5; emails with DO re fee motion .2;	1.7	
1/5: Analysis and review of case costs, email to KD re same .3; review and analysis re Clifton decl. and exhibits, emails with counsel re same .2; review client cost info, emails with same .2;	.7	
1/6: Phone call from CM Siebert re settlement .1; email to Wang re transcript issue .1; emails with DE re appeal .1; review client records .1; emails with TB .1; review fee motion rules and emails with DO re timing and multiplier issues .4;	.9	
1/7: Phone call with RK re settlement issues, appeal, memo to file 1.1; prepare for hearing .2; emails with DO re fee motion .1; review Robar documents .1; emails and call with client re incentive award .3; review emails from Biloti and Robar decl. .1; emails with PWS and Mackey re expert billing issue, analysis re same .2;	2.1	

1/8: Review order on request for J, emails with counsel re same .1; attend status conference .6; phone call with TB and RGK re Robar and appeal, memo to file .9; emails with settlement committee re Robar .3; analysis re 664.6 issue with Robar .2; phone calls from two CMs re settlement, watermaster and appeal .6; research on 664.6 issues with Robar .6; emails with RK re fee motion .1; emails with counsel re watermaster .2; many (10+) emails with DO re fee motion issues .3; email to Pearl re same .1; emails with client re fee motion and incentive award .3; emails with LO counsel re watermaster .1;	3.8	
1/9: Emails to LO counsel fee motion .3; legal research on fee motion procedural and substantive issues 1.2; email with RK re same .1;	1.6	
1/11: Research on recent fee surveys, opinions on same and multiplier 2.6; email to KD re timesheet review .2;	2.8	
1/11: Review timesheets for 2013 and 2014, email to MM 2.9	0	2.9
1/12: Email to LO counsel re appeal issues .1; email to DO re appeal issues .1; participate in liaison comm conf call .8; legal research on Robar and judgment status, vacating same, timing and impact on settling parties .7; phone calls to RZ and RGK re appellate issues .2; legal research on trial court jurisdiction during appeal for 473 motion and motion to vacate judgment 1.2; email to LO counsel re same and handling Robar claim .3; review of DO fee bills and emails with same .1; analysis and review of potential evidence for fee motion, emails with DO re same 1.0;	4.5	
1/13: Phone call from RZ n/c; emails with DO and client .1	.1	
1/14: Review and analysis of WW letter and email to LO counsel re watermaster board issues .4; email and phone call to client re same .3; phone call to RGK re watermaster issues .8; phone calls with RZ and WS re same .1; phone call to BB re city meeting and watermaster .4; phone call with MF re watermaster voting, analysis of judgment re same .4; prepare memo to LO counsel re watermaster seat options .3; phone call from CM Quigley re settlement .2; phone call from RZ and email to MF re watermaster .1; emails to RGK re Bolthouse .1; call to JD re fee motion timing .1; email to PWS re judgment challenge .2; emails with client re watermaster .1; email to Wang re judgment posting .1; phone call with JD re hearing dates .1; emails with LO counsel re watermaster election issues .2; review AVEK memo and email to LO counsel re same n/c	3.9	
1/15: Review of Ritter motion .1; phone call to RGK re Ritter depo .2; phone call and emails with JD and DO re hearing schedule .2; phone call with Pearl re fee motion issues, memo to file .6; legal research on post judgment discovery .4; emails with BB re Ritter depo .3; emails with DO and LO counsel re handling same .2; phone call with WS re watermaster .4; emails with client re watermaster selection .7; prepare notice of depo for Ritter and document requests, emails with LO counsel and revise same .4; emails with GSI and counsel re payment issues .1; emails with RW re ex parte .1; further emails with BB and DO re Ritter depo .1;	3.8	

1/18: Phone call with RK re fee motion issues, memo to file .3; analysis re lodestar issue and emails with RK .4; prepare stipulation re fee filing, email to JD re same .3; emails with counsel re same .1; participate in settling party conf call re watermaster 1.2; emails to LO counsel re same, analysis of judgment and party list for voting .2; emails with counsel re fee motion timing .1; emails with DO re fee motion .1; emails with LO counsel re watermaster board election .3; review Workproduct spreadsheets, and emails with counsel re Ex. 4 contacts, review file records re same .2; emails with MD and client re meeting .1; call to client re same .3; legal research re public benefit issue on 1021.5 1.9	5.4	
1/19: Phone call with client re AV United meeting and watermaster issues .8; review Ritter objection, email to RW re hearing .1; legal research on post judgment discovery .8; emails with MD re meeting .1; emails with LO counsel re Ritter .1; analysis re client decl and email to client re same .2; prepare initial client decl outline, email to client .3; emails with counsel re voting contacts .1; meeting with KD re AV work analysis for fee mtn .1; emails with BB re Ritter hearing .2; prepare Ritter ex parte 2.5;	5.3	
1/20: Review Ritter opp to ex parte, relevant file materials, and draft reply brief 1.0; many emails with DO re same .2; phone call from RK re fee motion, memo to file .3; phone call from client re declaration data .3; emails with GSI and counsel re billing issues, analysis re same .1; email to JD and review BB letter, Fife filing .1; many emails with DO re fee motion and Ritter .2; email to TT re VM and status .1; preparation of draft of MM declaration for fee motion 5.4; email to Pearl re same and DO decl. .1	7.8	
1/21: Emails with BB re depo .1; review MF filing, review Stip and draft letter to Fife re Ritter claim, emails with DO and LO counsel re same, revise letter 1.0; emails with MD and review draft Robar letter, revise same .1; phone call from R Pearl re fee motion issues .2; emails with US re watermaster voting .1; travel to (with calls to Brumfield, Fife and Davis) meeting with AV United and attend watermaster meeting, including hearing on Ritter depo 6.7; emails with MD re Robar .1; phone call to JD re stip and Ritter .1; many emails with Brumfield re depo .2; finalize stip for filing .1; email to KD re transcript review .1; phone call from RK re fee motion .2; review of RK lodestar analysis and many emails with same .2; emails with DO re Ritter .1;	9.3	
1/21: Review and analysis re hearing transcripts for fee motion 2.0 KD	0	2.0
1/22: Phone call from RGK re Ritter motion .1; emails with TT re conflict .2; many (35+) emails with Brumfield, DO and LO counsel re Ritter depo .8; prepare outline for Ritter depo, review docs, emails with DO .4; emails with Pearl re fee motion issues .3; brief review of Willis fee motion .1; email to JD and finalize stip .1; legal research on fee motion multiplier issues, 1021.5 impacts on same 2.3;	4.3	
1/22: Review and analysis re hearing transcripts for fee motion 1.5 KD	0	1.5
1/23: Emails with DO re Willis motion .1; brief review of Pearl comments to MM decl. .1; emails with client re decl changes .2; review fee bills, summary and changes memo, email to Pearl re same .9; drafting of fee motion 3.1;	4.4	
1/24: Emails with DO and Pearl re fee motion decls .2; email to GCG re billing .1;	.3	

1/25: Review and revise Pearl decl. and emails with same 2.9; call from Pearl .1; review and revise MM declaration 2.4; emails to Pearl re fee issues and case history .4; revise RAW declaration, review exhibits, email to same 2.8; conf with KD re review of 2015 timesheets .1; review PWS allocations and analysis re fee allocation .5; review edits to same .4; review transcripts and orders for fee motion .7; emails to DO and Pearl re same .2; review Pearl further markup of MM declaration, and revise same 1.5; analysis re Ritter depo and emails to DO re same .3; review DO decl. .3; review of 2015 fee bills and corrections to same .5; review 2014 timesheets and summary .6;	13.7	
1/25: Review and analysis re hearing transcripts for fee motion, prepare summary memo for same 5.5 KD	0	5.5
1/26: Phone call with client re declaration .1; review and analysis of exhibits .1 emails with client re same .1; phone call from TT re conflict and other work .2; phone call to Quass re same .1; many emails with Brumfield and DO re Ritter depo .4; review of client comments to decl, phone call with same .6; review and revise RAW decl and exhibits, email with client 1.0; phone call from RGK re settlement and Ritter .3; phone call with Pearl .2; review and editing of Pearl declaration .9; emails with same .2; review trial court orders in six cases, legal research on Judge' fee options .8; further revise Pearl Decl., emails with same .5; review and analysis of KD memo and transcripts, revise MM declaration re same .7; many emails with DO re fee motion issues, DO decl .3; emails with RK re depo and fee motion .1; review and finalize DO declaration and exhibits .4; review and finalize RAW declaration and exhibits .4; revise MM declaration .6; review and analysis re MM exhibits .3	8.3	
1/26: Review and analysis re hearing transcripts for fee motion, supplement summary memo for same 4.5 KD	0	4.5
1/27: Continue drafting of fee motion, edit declarations ISO same 4.0 [ONLY CURRNT THROUGH 11 a.m.]	2.7	
<b>TOTAL ATTORNEY HOURS</b>	<b>90.6</b>	
<b>TOTAL PARALEGAL HOURS</b>		<b>13.5</b>