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Attorneys for Plaintiff Richard Wood and the Class

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER
CASES

RICHARD A. WOOD, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

v.

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40; et
al.

Defendants.

Judicial Council Coordination
Proceeding No. 4408

Lead Case No. BC 325201

Case No.: BC 391869

RICHARD WOOD'S *EX PARTE*
APPLICIATION TO STRIKE
OVERSIZE BRIEF OR,
ALTERNATIVELY, TO PERMIT
PLAINTIFF TO FILE OVERSIZE
REPLY BRIEF

Location: Telephonic
Date: March 21, 2016
Time: 1:30 p.m.

1 On March 15, 2016, Defendant Los Angeles County Waterworks District
2 No. 40 (“District No. 40”) filed a 30-page Opposition to Plaintiff Richard Wood’s
3 Motion for Attorneys’ Fees, Costs and Incentive Award – a brief that is twice the
4 length allowed. (C.R.C. 3.111(d).)

5 The page limit for this Opposition brief is 15 pages. (C.R.C. 3.111(d).)
6 District No. 40 did not file an application or a motion requesting leave to file an
7 oversized brief, as is required. (C.R.C. 3.111(e).) This rather egregious violation
8 of the Rules of Court merits the striking of the brief in its entirety, or the last 15
9 pages of the brief. (C.R.C. 3.111(g) (“A memorandum that exceeds the page limits
10 of these rules *must* be filed and considered in the same manner as a late-filed
11 paper.” (emphasis added).))

12 Alternatively, if the Court is not inclined to take any action as to this
13 grossly oversized brief, Plaintiff requests leave to file an oversized reply brief.
14 The Lemieux firm has filed an Opposition of 13 pages in length, which means that
15 the defendants have filed 43 pages of Opposition briefing. Plaintiffs therefore
16 request that if District No. 40’s brief is not reduced in size, that Plaintiff be given
17 leave to file a reply brief of 20 pages. Given the import of this Motion, and the
18 litany of arguments raised by the Defendants, that is justified.

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20 DATED: March 17, 2016

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23 By: _____
24 Michael D. McLachlan
25 Attorneys for Plaintiff
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