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Attorneys for Plaintiff Richard Wood and the Class

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

Coordination Proceeding
Special Title (Rule 1550(b))

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

Plaintiff,

v.

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

Defendants.

Judicial Council Coordination
Proceeding No. 4408
(Honorable Jack Komar)

Lead Case No. BC 325201

Case No.: BC 391869

**OBJECTION TO HEARING DATE
ON MOTION O TAX COSTS**

Location: Room 222
Date: June 30, 2016
Time: 9:00 a.m.

1 For the reasons set forth in the attached E-mail (Exhibit 1), Small Pumper
2 Class Counsel objects to the Notice of Motion on the Motion to Tax Costs, and
3 requests that the hearing date be moved back in time at least 10 days.
4 Alternatively, opposition papers could be filed on June 22, with shortened time
5 for a reply, if any.

6 Procedurally, the Notice is untimely under the Code. Class Counsel is
7 informed by Mr. Dunn that he has no objection to continuing the hearing date.

8
9 DATED: June 9, 2016

LAW OFFICES OF MICHAEL D. McLACHLAN
LAW OFFICE OF DANIEL M. O'LEARY

10
11
12 By: 

MICHAEL D. MCLACHLAN
Attorneys for Plaintiff and the Class

Exhibit 1

Mike McLachlan

From: Mike McLachlan
Sent: Thursday, June 09, 2016 2:06 PM
To: Jeffrey Dunn
Cc: wendy.wang@bbklaw.com; Dan Oleary; Dan Oleary
Subject: Motion to tax

Jeff,

I would like you to reset the hearing on your motion to tax costs. A week or more is sufficient. I have about two hours of work left today, then I fly out of the country through the 19th for a large family vacation that has been two years in making. Nearly all of the costs at issue were incurred by my office, and all of those materials are here. It has been an issue I have been handling. With that, my absence, and his schedule, it is not likely something Dan can easily step in on.

Further, the notice on your motion is not timely under the code for a hearing on June 30. It is several days late.

Thanks,

Mike McLachlan

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