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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 (ret.))

Lead Case No. BC 325201

Case No.: BC 391869

**DECLARATION OF MICHAEL D.
MCLACHLAN IN SUPPORT OF
MOTION FOR ORDER
TERMINATING SMALL PUMPER
CLASS COUNSEL'S
APPOINTMENT AS CLASS
COUNSEL**

Date: August 24, 2023
Time: 2:00 p.m.
Place: Telephone Via Courtcall
Judge: Hon. Jack Komar

1 **DECLARATION OF MICHAEL D. MCLACHLAN**

2 I, Michael D. McLachlan, declare as follows:

3 1. I am an attorney licensed to practice in the State of California, and I
4 am one of the attorneys responsible for representing plaintiff and the Small
5 Pumper Class in the instant action. I have personal knowledge of the following,
6 and if called as a witness, I could and would testify competently thereto.

7 2. I file this declaration in support of the motion terminating class
8 counsels' representation of the Small Pumper Class.

9 3. On March 16, 2021, the Court of Appeal affirmed the trial court's
10 2015 Judgment. (*Willis v. LA District 40 etc. et, al.*, (2021) 62 Cal.App.5th 992).
11 On August 24, 2021, the Court of Appeal issued its Opinion reversing this Court's
12 rulings on the Small Pumper Class fees motions, and certain collateral rulings
13 directly related to these fee orders. Because all defendants except Los Angeles
14 County Waterworks District No. 40 ("District 40") had previously settled either at
15 the trial or during the appeals, the remanded issues only pertained to District 40.

16 4. On June 6, 2023, Class Counsel executed a release agreement in
17 favor of District 40 in exchange for payment in full of Judge Cunningham's fee
18 orders. Thereafter, District 40 requested dismissal of its most recent appeal.
19 The dismissal and remittitur were both issued on June 23, 2023. Attached as
20 Exhibits 1 and 2 are copies of the dismissal of District 40s latest appeal, and the
21 remittitur, respectively.

22 5. Hence, all matters relating to *Wood* fee and costs claims are fully
23 resolved.

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct.

3 Executed this 31st day of July 2023, at Hermosa Beach, California.

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5 /s/ Michael D. McLachlan
6 Michael D. McLachlan
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Exhibit 1

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT

DIVISION p

RICHARD A. WOOD,
Plaintiff and Respondent,

v.

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40,
Defendant and Appellant.

COURT OF APPEAL – SECOND DIST.

FILED

Jun 23, 2023

EVA McCLINTOCK, Clerk

OCarbone

Deputy Clerk

B325286

Los Angeles County Super. Ct. No. BC391869, BC391869

THE COURT:

Pursuant to appellant's request, the appeal filed November 23, 2022 is dismissed.
The clerk shall issue the remittitur forthwith.



Administrative Presiding Justice

Exhibit 2

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
EVA McCLINTOCK, CLERK

DIVISION p

Los Angeles County Superior Court

RICHARD A. WOOD,
Plaintiff and Respondent,

v.

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40,
Defendant and Appellant.

B325286

Los Angeles County Super. Ct. No. BC391869, BC391869

***** REMITTITUR *****

I, Eva McClintock, Clerk of the Court of Appeal of the State of California, for the Second Appellate District, do hereby certify that the attached is a true and correct copy of the original order, opinion or decision entered in the above-entitled cause on and that this order, opinion or decision has now become final.

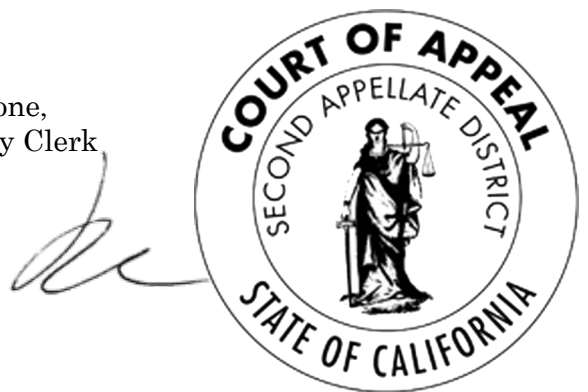
Respondent to recover costs on appeal.

Witness my hand and the seal of the Court
affixed at my office this

EVA McCLINTOCK, CLERK

by: O. Carbone,
Jun 23, 2023 Deputy Clerk

cc: All Counsel (w/out attachment)
File



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On July 31, 2023, I caused service in the manner indicated below of the foregoing document(s) described as **DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF MOTION FOR ORDER TERMINATING SMALL PUMPER CLASS COUNSEL’S APPOINTMENT AS CLASS COUNSEL** to be served on the parties in this matter as follows:

- /s/ Katelyn Furman
Katelyn Furman