MEMORANDUM

Date: March 26, 2009

To: Mike McLachlan, Law Offices of Michael D. McLachlan, APC
Dan O’Leary, Law Office of Daniel M. O’Leary

From: Timothy J. Thompson, Vice President and Senior Consultant

Re: Technical Support Services re: Small Pumpers Class, Antelope Valley Groundwater Adjudication

Task 1. Self Help Defense / Reasonable and Beneficial Use of Groundwater

Services associated with this task will include:

(a) Documentation of historical water use, including amounts and historical use periods for representative members of the Class. Work products will include summary memoranda, maps, charts, databases and other technical products.

(b) Preparation of questionnaire to be circulated to Class members to collect detailed information on historical groundwater use. Information to be requested to be determined by counsel and/or the Court, but will likely include number of wells, years of groundwater pumping, availability of definitive groundwater-usage documentation (including but not limited to electrical usage records, well repair records, flow meter records, written logs of well operations, etc.), water level records, and well deepening or improvements related to changing water levels. Additional data requests may also be included in the questionnaire, or in follow-up communications with Class members.

(c) Provide deposition and trial testimony as necessary.

Estimated Budget for Initial Phase:

Self Help Defense / Beneficial Use $110,000

TOTAL BUDGET $110,000

This estimated budget includes time for principals and staff.