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9 Chandler, Trustee of the Bettina Chandler  
10 Trust

11 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES, COMPLEX CIVIL DIVISION**

13 SANTA BARBARA CHANNELKEEPER,  
14 A California non-profit corporation,

15 Petitioner,

16 v.

17 STATE WATER RESOURCES  
18 CONTROL BOARD, a California State  
19 Agency; CITY OF SAN  
20 BUENAVENTURA, a California  
21 municipal corporation,

22 Respondents.

23 AND RELATED CROSS-ACTION.  
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Case No. 19STCP01176

Assigned for all purposes to the Hon. William F.  
Highberger, Dept. SS10

**INITIAL DISCLOSURES OF BETTINA  
CHANDLER, TRUSTEE OF THE BETTINA  
CHANDLER TRUST (CAL. CODE CIV.  
PROC., § 842)**

Action Filed: September 19, 2014

1 Pursuant to California Code of Civil Procedure (“C.C.P.”) section 842, cross-defendant  
2 Bettina Chandler, Trustee of the Bettina Chandler Trust (“Chandler”) hereby submits her initial  
3 disclosures based on the information reasonably available to her. (C.C.P. § 842, subd. (c).)  
4 Chandler reserves the right to supplement its disclosures in accordance with C.C.P. section 842,  
5 subdivision (d) and otherwise.

## 6 DISCLOSURES

7 **1. C.C.P. § 842(a)(1):** The name, address, telephone number, and email address of  
8 the party and, if applicable, the party’s attorney.

9 Chandler’s address is 1013 Shokat Drive. Chandler may be contacted at 805.649.9117 and  
10 [bchand1941@aol.com](mailto:bchand1941@aol.com).

11 Chandler is represented by Neal Maguire of Fergsuon Case Orr Paterson LLP, 1050 South  
12 Kimball Road, Ventura, California 93004; (805) 659-6800 and [nmaguire@fcoplaw.com](mailto:nmaguire@fcoplaw.com).

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14 **2. C.C.P. § 842(a)(2):** The quantity of any groundwater extracted from the basin by  
15 the party and the method of measurement used by the party or the party’s predecessor in interest  
16 for each of the previous 10 years preceding the filing of the complaint.

17

18 Year	Total Water Production from the Ventura River Watershed
19 2004-2020	1 AF annually (estimate)

20

21 **3. C.C.P. § 842(a)(3):** The type of water right or rights claimed by the party for the  
22 extraction of groundwater.

23 Chandler asserts overlying rights to produce and use groundwater, including rights under  
24 the self-help doctrine if prescriptive rights are asserted. Alternatively, Chandler asserts riparian or  
25 appropriative rights.

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27 **4. C.C.P. § 842(a)(4):** A general description of the purpose to which the groundwater  
28 has been put.

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Chandler utilizes water for domestic and ancillary agricultural irrigation uses.

**5. C.C.P. § 842(a)(5):** The location of each well or other source through which water has been extracted.

Chandler produces water from a well referenced as State Well Number 04N23W17B03S located on Assessor Parcel Number 011-0-230-105.

**6. C.C.P. § 842(a)(6):** The area in which the groundwater has been used. Chandler uses water on Assessor Parcel Number 011-0-230-105.

**7. C.C.P. § 842(a)(7):** Any claims for increased or future use of groundwater. Chandler claims the right to a reasonable and beneficial amount of water in the future.

**8. C.C.P. § 842(a)(8):** The quantity of any beneficial use of any alternative water use that the party claims as its use of groundwater under any applicable law, including, but not limited to, Section 1005.1, 1005.2, or 1005.4 of the Water Code.

At this time, Chandler does not assert such rights. Her investigation is on-going.

**9. C.C.P. § 842(a)(9):** Identification of all surface water rights and contracts that the party claims provides the basis for its water right claims in the comprehensive adjudication.

At this time, Chandler does not assert rights associated with surface water. Her investigation is on-going.

**10. C.C.P. § 842(a)(10):** The quantity of any replenishment of water to the basin that augmented the basin’s native water supply, resulting from the intentional storage of imported or non-native water in the basin, managed recharge of surface water, or return flows resulting from the use of imported water or non-native water on lands overlying the basin by the party, or the party’s representative or agent, during each of the 10 calendar years immediately preceding the

1 filing of the complaint.

2 At this time, Chandler does not assert rights associated with imported or non-native water  
3 from outside the Ventura River Watershed being utilized for replenishment purposes. Her  
4 investigation is on-going.

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6 **11. C.C.P. § 842(a)(11):** The names, addresses, telephone numbers, and email  
7 addresses of all persons possessing information that supports the party's disclosures.


8 At this time, Chandler is not aware of other pertinent persons. Her investigation is on-  
9 going.

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11 **12. C.C.P. § 842(a)(12):** Any other facts that tend to prove the party's claimed water  
12 right.

13 At this time, Chandler does not assert other facts, but her investigation is on-going.

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15 Date: June 1, 2021

FERGUSON CASE ORR PATERSON LLP

16  
17 By:   
18 Neal Maguire  
19 Attorneys for Cross-Defendant  
20 Bettina Chandler, Trustee of the Bettina  
21 Chandler Trust  
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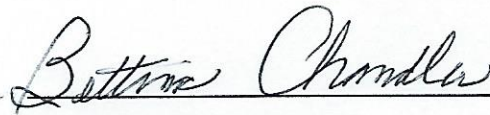
**VERIFICATION**

I, Bettina Chandler, declare as follows:

I am the Trustee of the Bettina Chandler Trust, a cross-defendant in the above-entitled action, and make this verification on its behalf. I have reviewed the INITIAL DISCLOSURES and know the contents thereof. The matters stated therein are true based on the information reasonably available to me at this time.

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

Executed on May 28, 2021 at Ojai, California.



Bettina Chandler