



1 ANDREW K. WHITMAN (SBN 128358)  
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 5 In Pro Per and Attorney for  
 6 Heidi A. Whitman, Nancy L.  
 7 Whitman and John R. and Nancy  
 8 L. Whitman Family Trust

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 10 FOR THE COUNTY OF LOS ANGELES

11  
 12 SANTA BARBARA CHANNELKEEPER,  
 13 a California non-profit corporation,

14 Petitioner,

15 v.

16 STATE WATER RESOURCES CONTROL  
 17 BOARD, A CALIFORNIA STATE AGENCY;  
 18 CITY OF SAN BUENAVENTURA, a  
 19 California municipal corporation, incorrectly  
 20 named as CITY OF BUENAVENTURA,

21 Respondents.

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CITY OF SAN BUENAVENTURA,  
 23 a California municipal corporation,

24 Cross-Complainant,

25 v.

26 DUNCAN ABBOTT, an individual, et al.

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Cross-Defendants.

Case No. 19STCP01176  
 Assigned to Judge William F. Highberger  
 Dept.: 10

Complaint filed: September 19,  
 2014 INITIAL DISCLOSURE OF  
 DEFENDANTS ANDREW K. WHITMAN,  
 HEIDI A. WHITMAN, NANCY L.  
 WHITMAN AND JOHN R. AND NANCY  
 L. WHITMAN FAMILY TRUST [CIVIL  
 CODE 842]

1 **DISCLOSURES OF ANDREW AND HEIDI WHITMAN**

2 **CC 842(a)(1) Name, address, telephone number, and email address**

3 Andrew and Heidi Whitman; property address 821 N. Signal St., Ojai CA  
4 [andyw821@gmail.com](mailto:andyw821@gmail.com); Represented by attorney Andrew K. Whitman

5 **CC 842(a)(2) Quantity of Groundwater Extracted**

6 No groundwater is extracted from the property nor has any water been extracted from  
7 the property during the past 10 years. All water for the property is for residential use supplied  
8 by Casitas Municipal Water District (previously by Golden State Water).

9 **CC 842(a)(3) Type of Water Right Claimed for Groundwater Extraction**

10 Property overlies the Ojai Groundwater Basin. Cross-defendants claim all rights  
11 available to overlying owners who do not currently extract groundwater.

12 **CC 842(a)(4) Description of the purpose to which the groundwater has been put**

13 No groundwater is extracted from the property. All water use on the property is  
14 reasonable and beneficial residential use.

15 **CC 842(a)(5) The location of each well**

16 There are no groundwater extraction wells on the property

17 **CC 842(a)(6) The area in which the groundwater has been used**

18 There are no groundwater extraction wells on the property.

19 **CC 842(a)(7) Any claims for increased or future use of groundwater.**

20 Cross-defendants claim all rights available to overlying land owners who do not  
21 currently extract groundwater (including but not limited to a future groundwater well and  
22 groundwater extraction).

23 **CC 842(a)(8) The quantity of any beneficial use of any alternative water**

24 Not applicable.

25 **CC 842(a)(9) Surface water rights and contracts**

26 No surface water right is claimed.

27 **CC 842(a)(10) Replenishment of water to the basin**

28 Not applicable.

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2 **CC 842(a)(11) Persons with knowledge of these disclosures**

3 Andrew and Heidi Whitman

4 **CC 842(a)(12) Any other facts that tend to prove the party's claimed water right**

5 Cross-Complainant City of Ventura has no right to claim any form of water right associated  
6 with the subject property.

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8 **DISCLOSURES OF JOHN AND NANCY WHITMAN FAMILY TRUST**

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10 **CC 842(a)(1) Name, address, telephone number, and email address**

11 The trust can be contacted through its attorney Andrew Whitman 821 N. Signal St., Ojai  
12 CA [andyw821@gmail.com](mailto:andyw821@gmail.com). The property is located at 12615 Koenigstein Rd., Santa Paula, CA

13 **CC 842(a)(2) Quantity of Groundwater Extracted**

14 No groundwater is or has ever been extracted from the Ventura River Lower Basin,  
15 Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.

16 **CC 842(a)(3) Type of Water Right Claimed for Groundwater Extraction**

17 No groundwater is or has ever been extracted from the Ventura River Lower Basin,  
18 Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin. This  
19 cross-defendant claims no right to extract any groundwater to any of the four basins.

20 **CC 842(a)(4) Description of the purpose to which the groundwater has been put**

21 No groundwater is or has ever been extracted from the Ventura River Lower Basin,  
22 Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin. CC

23 **842(a)(5) The location of each well**

24 No groundwater is or has ever been extracted from the Ventura River Lower Basin,  
25 Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.

26 **CC 842(a)(6) The area in which the groundwater has been used**

27 No groundwater is or has ever been extracted from the Ventura River Lower Basin,  
28 Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.

1 **CC 842(a)(7) Any claims for increased or future use of groundwater.**

2 Cross-defendant makes no claims for groundwater usage from the Ventura River Lower  
3 Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.  
4 claim all rights available to overlying owners who do not currently extract groundwater. Cross-  
5 defendant does not anticipate making such claims in the future.

6 **CC 842(a)(8) The quantity of any beneficial use of any alternative water**

7 Not applicable.

8 **CC 842(a)(9) Surface water rights and contracts**

9 No surface water that flows to the Ventura River is claimed. Any surface water on the  
10 property flows to the Santa Clara River.

11 **CC 842(a)(10) Replenishment of water to the basin**

12 Not applicable.

13 **CC 842(a)(11) Persons with knowledge of these disclosures**

14 Andrew Whitman

15 **CC 842(a)(12) Any other facts that tend to prove the party's claimed water right**

16 Cross-Complainant City of Ventura has no right to make any claim concerning surface  
17 or groundwater associated with Cross-defendant's property.

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Andrew K. Whitman, individually,  
21 and as attorney for Heidi Whitman and  
22 John R. and Nancy L. Whitman  
23 Family Trust  
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