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CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

OCT 25 2019

Sherri R. Carter, Executive Officer/Clerk
By: Tanya Herrera, Deputy

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

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

13 Petitioner,

14 v.

15 STATE WATER RESOURCES
CONTROL BOARD, a California State
16 Agency;
17 CITY OF SAN BUENAVENTURA, a
California municipal corporation,
incorrectly named as CITY OF
8 BUENAVENTURA,

9 Respondents.
10

11 CITY OF SAN BUENAVENTURA, a
California municipal corporation,

12 Cross-Complainant

13 v.

14 DUNCAN ABBOTT, an individual, et al.

15 Cross-Defendants.
16

Case No. 19STCP01176

Judge: Honorable William F. Highberger

Exempt From Filing Fees Pursuant to Cal.
Gov't Code § 6103

JOINT STATUS CONFERENCE
STATEMENT

CMC: Nov. 1, 2019
Time: 1:30 p.m.
Dept: SS10

Action Filed: Sept. 19, 2014
FAC Filed: Sept. 7, 2018
Trial Date: Not Set

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1 The 3rd Am. Cross-Complaint addresses the service and naming of property owners only
2 overlying one of the four basins (“Overlying Landowners”) differently as required by law. At the
3 hearing on the Motion for Approval, City initially proposed to individually name the Overlying
4 Landowners in an exhibit and refer to them generically in the caption and the body of the
5 pleading. However, after further reviewing the Streamlined Groundwater Adjudication Statutes,
6 counsel for City believes the Overlying Landowners are not immediately considered to be parties
7 to the case. California Civil Procedure Code section 836(a)(1)(A) (emphasis added) requires the
8 notice to property owners to state in part: “you may become a party to this lawsuit by filing an
9 answer to the lawsuit on or before the deadline specified in this notice.” In other words, an
10 Overlying Landowner only becomes a cross-defendant if he or she answers the 3d Am. Cross-
11 Complaint.

12 Not individually naming the Overlying Landowners will not prevent this Court from
13 adjudicating all water rights since this is an in rem action. Section 836(j) (emphasis added)
14 confirms this point: “Compliance with the service and notice provisions of this chapter shall be
15 deemed effective service of process of the complaint and notice on all interested parties of the
16 comprehensive adjudication for purposes of establishing in rem jurisdiction and the
17 comprehensive effect of the comprehensive adjudication.” Therefore, City drafted the 3rd Am.
18 Cross-Complaint to refer to the Overlying Landowners generically, but did not name them
19 individually in an exhibit. As explained in Section 1.C below, City will provide the Court
20 information regarding the Overlying Landowners to aid in processing these potential cross-
21 defendants.

22 Jurisdiction in rem is a “way of referring to jurisdiction over the interests of persons in a
23 thing.” Shaffer v. Heitner, 433 U.S. 186, 207 (1977) (citing Restatement (Second) of Conflict of
24 Laws § 56, Introductory Note (1971)). Consistent with the Streamlined Groundwater
25 Adjudication Statutes, in rem actions in other contexts do not specifically name potential
26 claimants with an interest in the property. See Cal. Civ. Proc. Code § 762.060(a) (the summons
27 in a quiet title action “may name as defendants ‘all persons unknown, claiming any legal or
28 equitable right, title, estate, lien, or interest in the property described in the complaint adverse to

1 plaintiff's title. . . ."); Id. § 861.1 (the summons in a validation action shall be directed to "all
2 persons interested in the matter of [specifying the matter]") (brackets in original); Estate of
3 Radovich v. Citizens Nat'l Tr. and Sav. Bank of Los Angeles, 48 Cal.2d 116, 120 (1957) (a
4 probate action settles "the rights of all persons claiming as heirs of the decedent, whether or not
5 they are named in the complaint or personally served with the summons") (citing Title &
6 Document Restoration Co. v. Kerrigan, 150 Cal. 289, 307 (1906)).

7
8 B. SERVICE OF THE LANDOWNERS

9
10 As described above, the landowners added in the Third Amended Cross-Complaint fall
11 within three categories: (1) Riparian Landowners; (2) Riparian and Overlying Landowners; and
12 (3) Overlying Landowners. Each category raises different service issues. The City previously
13 named all known appropriators, surface water users, and groundwater users, except for federal
14 entities, in its Second Amended Cross-Complaint, identified as the "Original Cross-Defendants"
15 in the Third Amended Cross-Complaint. If the City identifies additional appropriators or others
16 with claims to the surface water or groundwater of the Ventura River Watershed, either pursuant
17 to California Civil Procedure Code section 836.5, or other means, the City will name them as
18 parties.

19 Because the Riparian Landowners are not immediately subject to the Streamlined
20 Groundwater Adjudication Statutes, they will be served with the Summons and 3d Am. Cross-
21 Complaint pursuant to California Civil Procedure Code sections 413.10 – 417.40. The Summons
22 will use the standard form and provide 30 days to respond. Cal. Civ. Proc. Code § 412.20(a)(6).

23 The Riparian and Overlying Landowners may fit into either or both categories since they
24 own land that overlies one of the four groundwater basins and is riparian to the Ventura River and
25 its tributaries. As a result, City conservatively decided not to rely on the Streamlined
26 Groundwater Adjudication Statutes for service of these named parties. Instead, City will serve
27 the Riparian and Overlying Landowners with the Summons and Third-Amended Cross-
28 Complaint like the Riparian Landowners. Id. §§ 413.10 – 417.40. Also, like the Riparian

1 Landowners, the Summons will use the standard form and provide 30 days to respond. Id. §
2 412.20(a)(6).

3 The Overlying Landowners fit squarely within the Streamlined Groundwater Adjudication
4 Statutes, and accordingly, City will serve them with the Notice of Adjudication, Form Answer
5 and Third-Amended Cross-Complaint as described above in Section 1.A.

6
7 C. NOTICE TO THE COURT
8

9 In its File & ServeXpress message board posting, on October 2, 2019 (“Court Posting”),
10 the Court asked whether there is any statute or rule of court that provides the clerk of court
11 “actual notice of who all is supposed to get summary notice pursuant to C.C.P. sec 836(d)(1)
12 since they will be considered to have party status.” City is not aware of any statute or rule of
13 court that requires this information. Section 836(d)(1)(A) only requires City to “provide the court
14 and all parties with notice of its acquisition of, or sufficient access, to this [property parcel
15 numbers and addresses and owner names and addresses] information,” but not the specific
16 information it acquires. Similarly, Section 836(e) requires City to “file with the Court a notice of
17 the completion of the mailing,” but not any specifics as to who was mailed. In addition, as
18 explained above, persons who receive the notice will only obtain party status if they file the form
19 answer.

20 However, City will periodically file or lodge with the Court an Excel spreadsheet that lists
21 the Overlying Landowners who received notice by name, address and parcel number, and lists the
22 Overlying Landowners who filed the Form Answer. While City was not able to locate a specific
23 provision regarding the confidentiality of this property information, City is sensitive to the
24 individuals’ privacy concerns and would appreciate the Court’s guidance on how the spreadsheet
25 should be filed with the Court, and whether it should be served on the parties.

26 A copy of the 3d Am. Cross-Complaint for which City seeks leave to file is attached as
27 Exhibit A.
28

1 2. MOTION FOR APPROVAL

2
3 At the hearing on October 2, 2019, and in the Court Posting, the Court provided direction
4 regarding the Motion for Approval. The revised Notice of Commencement of Groundwater
5 Basins and Watershed Adjudication (“Notice of Adjudication”): (1) explains the protocols for
6 filings by mail, personal delivery or fax at the Stanley Mosk Courthouse; (2) refers to Judge
7 Highberger’s Order providing 60 days to respond; (3) refers to the 3rd Am. Cross-Complaint; (4)
8 states the required filing fee; (5) lists only one Best Best & Krieger LLP attorney to contact for
9 further information to ensure consistency; and (6) provides notice of the date, time and place of
10 community meetings to explain these proceedings. Item (5) above was not discussed at the
11 hearing. Because a significant number of Overlying Landowners speak Spanish, City will further
12 provide a Spanish version of the Notice of Adjudication.

13 The meetings described in item (6) above will be open to all potential parties and their
14 counsel who have appeared in this case. The meetings will be conducted by City, and shall take
15 place on:

16 Tuesday, December 10, 2019, 6:00 to 8:00 p.m.
17 Oak View Community Center, Kunkle Room
18 18 Valley Road
19 Oak View, CA 93022

20 Wednesday, December 18, 2019, 6:00 to 8:00 p.m.
21 Bell Arts Factory, Community Room
22 432 N. Ventura Ave
23 Ventura, CA 93001

24 Also pursuant to the hearing on the Motion to Approve, the proposed revised Order
25 Granting City’s Motion for Approval: (1) sets forth the filing protocols with the Stanley Mosk
26 Courthouse; (2) provides 60 days to respond to the 3rd Am. Cross-Complaint; (3) refers to the 3rd
27 Am. Cross-Complaint; and (4) deletes the reference to waiver of the appearance fee.

28 Copies of the revised English Notice of Adjudication, revised Spanish Notice of
Adjudication, and revised Order Granting City’s Motion for Approval are attached as Exhibits B

1 C, and D, respectively.

2
3 3. NEUTRAL WEBSITE

4
5 City will establish and maintain during the pendency of litigation a neutral website
6 containing pleadings, reports, notices, party information contemplated by the Order for Stay,
7 signed August 23, 2019, and discovery if the stay is lifted. Parties who have appeared in the case
8 shall have access to file and review information on the website. City proposes the following
9 address for the website: venturariverwatershedadjudication.com . City proposes to use the
10 following vendor to host and maintain the website: JND Legal Administration, 1-800-207-7160,
11 and www.jndla.com.

12
13 4. INTERVENTION

14
15 The SWRCB and the California Department of Fish and Wildlife intend to file separate
16 motions to intervene pursuant to Section 837. The SWRCB is not named as a cross-defendant in
17 the adjudication and intends to move to formally intervene in an abundance of caution to ensure
18 party status. Those motions should be filed before November 1, 2019.

19
20 5. SETTLEMENT

21
22 As explained to the Court at the hearing on the Motion for Approval, City and
23 Channelkeeper have settled Channelkeeper's past claims, but preserved Channelkeeper's future
24 claims until such time as a final judgment is entered in this case. Furthermore, City and the
25 consumptive users who participated in the mediation sessions have been holding weekly
26 conference calls and had several in person meetings to settle the entire case. Those parties are
27 making good progress towards the goal of agreeing to a physical solution.

28 A physical solution will resolve "conflicting claims in a manner that advances the

1 constitutional rule of reasonable and beneficial use of the state's water supply." City of Santa
2 Maria v. Adam, 211 Cal.App.4th 266, 287 (2012). The trial court has a duty to take an active role
3 in fulfilling the constitutional requirements of reasonable and beneficial use of water by
4 considering or imposing a physical solution:

5
6 Since the adoption of the 1928 constitutional amendment [now Article X, Section
7 2], it is not only within the power, but it is also the duty, of the trial court to admit
8 evidence relating to possible physical solutions, and, if none is satisfactory to it, to
9 suggest on its own motion such physical solution.

10
11 City of Lodi v. East Bay Mun. Util. Dist., 7 Cal.2d 316, 341 (1936). Accordingly, the
12 consumptive users hope to be able to report to the Court relatively soon regarding a
13 comprehensive physical solution that they believe will fulfill the constitutional requirements of
14 reasonable and beneficial use of water in the Ventura River Watershed. The SWRCB and CDFW
15 have not been a party to these conversations, but are open to hearing the proposals.

16 Dated: October 24, 2019

COOPER & LEWAND-MARTIN, INC.

17
18 By: 

DANIEL COOPER

Attorneys for Petitioner and Plaintiff
SANTA BARBARA CHANNELKEEPER

20
21 Dated: October , 2019

CALIFORNIA ATTORNEY GENERAL'S
OFFICE

22
23 By:

MATTHEW BULLOCK

Deputy Attorney General

MARC N. MELNICK

Deputy Attorney General

Attorneys for Respondent STATE WATER
RESOURCES CONTROL BOARD

1 constitutional rule of reasonable and beneficial use of the state's water supply." City of Santa
2 Maria v. Adam, 211 Cal.App.4th 266, 287 (2012). The trial court has a duty to take an active role
3 in fulfilling the constitutional requirements of reasonable and beneficial use of water by
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15 have not been a party to these conversations, but are open to hearing the proposals.

16 Dated: October , 2019

COOPER & LEWAND-MARTIN, INC.

17
18
19 By:

DANIEL COOPER
Attorneys for Petitioner and Plaintiff
SANTA BARBARA CHANNELKEEPER

20
21 Dated: October 24, 2019

CALIFORNIA ATTORNEY GENERAL'S
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22
23
24 By: 

MATTHEW BULLOCK
Deputy Attorney General
MARC N. MELNICK
Deputy Attorney General
Attorneys for Respondent STATE WATER
RESOURCES CONTROL BOARD

1 Dated: October 24, 2019

BEST BEST & KRIEGER LLP

2
3 By: 

4 GENE TANAKA
5 SHAWN HAGERTY
6 SARAH CHRISTOPHER FOLEY
7 DAKOTAH BENJAMIN
8 Attorneys for Defendant and Cross-
9 Complainant CITY OF SAN
10 BUENAVENTURA

11
12 October 24, 2019

HERUM CRABTREE SUNTAG

13
14 By:  with permission

15 JEANNE ZOLEZZI
16 Attorneys for Cross-Defendants MEINERS
17 OAKS WATER DISTRICT and VENTURA
18 RIVER WATER DISTRICT

19
20 October ~~24~~, 2019

FERGUSON CASE ORR PATTERSON LLP

21
22 By: 

23 NEAL MAGUIRE
24 Attorneys for Cross-Defendant RANCHO
25 MATILJA MUTUAL WATER
26 COMPANY

27
28 October , 2019

BROWNSTEIN HYATT FARBER
SCHRECK LLP

By: _____

SCOTT SLATER
BRADLEY HERREMA
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CLAEYSSENS FOUNDATION

1 Dated: October 24, 2019

BEST BEST & KRIEGER LLP

2
3 By: 

4 GENE TANAKA
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6 SARAH CHRISTOPHER FOLEY
7 DAKOTAH BENJAMIN
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8 October 24, 2019

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11 JEANNE ZOLEZZI
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14 RIVER WATER DISTRICT

15 October , 2019

FERGUSON CASE ORR PATTERSON LLP

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20 MATILIJIA MUTUAL WATER
21 COMPANY

22 October²⁴, 2019


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24 By: 

25 SCOTT SLATER
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28 Attorneys for Cross-Defendant WOOD-
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1 October²⁴, 2019

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6 October , 2019

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13 Attorneys for Cross-Defendant CASITAS
14 MUNICIPAL WATER DISTRICT
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October , 2019

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October ~~24~~ 2019

RUTAN & TUCKER, LLP

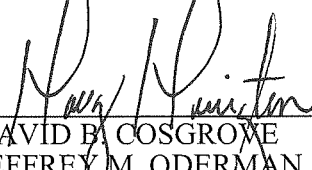
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EXHIBIT A

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10 Attorneys for Respondent and Cross-Complainant
11 CITY OF SAN BUENAVENTURA

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES

14 SANTA BARBARA CHANNELKEEPER,
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18 STATE WATER RESOURCES
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19 Agency;
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20 California municipal corporation,
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23 CITY OF SAN BUENAVENTURA, a
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25 Cross-Complainant

26 v.

27 DUNCAN ABBOTT;
AGR BREEDING, INC.;
28 [continued on next page]

Exempt From Filing Fees Pursuant to
Cal. Gov't Code § 6103

Case No. 19STCP01176

Judge: Honorable William F. Highberger

Deemed Verified Pursuant to Cal. Civ. Proc.
Code § 446

RESPONDENT AND CROSS-
COMPLAINANT CITY OF SAN
BUENAVENTURA'S THIRD AMENDED
CROSS-COMPLAINT FOR:

1. VIOLATION OF REASONABLE USE;
2. VIOLATION OF PUBLIC TRUST;
3. DECLARATORY RELIEF - PUEBLO
AND/OR TREATY WATER RIGHTS;
4. DECLARATORY RELIEF -
PRESCRIPTIVE WATER RIGHTS;
5. DECLARATORY RELIEF -
APPROPRIATIVE WATER RIGHTS;
6. COMPREHENSIVE ADJUDICATION;
7. DECLARATORY RELIEF - MUNICIPAL
PRIORITY;
8. DECLARATORY RELIEF - HUMAN
RIGHT TO WATER; and
9. DECLARATORY RELIEF

1 ASQUITH FAMILY LIMITED PARTNERSHIP, LTD.; TROY BECKER; BENTLEY FAMILY
2 LIMITED PARTNERSHIP; ROBIN BERNHOFT; DEWAYNE BOCCALI; JANET
3 BOULTON; MICHAEL BOULTON; DWAYNE BOWER; BURGESS RANCH; MICHAEL
4 CALDWELL; CASITAS MUNICIPAL WATER DISTRICT; CASITAS MUTUAL WATER
5 COMPANY; CHARLES CHO; JOE CLARK; KEVIN CLARK; LISA CLARK; REBECCA
6 COLLINS; THOMAS COLLINS; MICHAEL CROMER; ROBERT C. DAVIS, JR.; LINDA
7 EPSTEIN; ESSICK FARM MANAGEMENT COMPANY, LLC; ETCHART RANCH; JAMES
8 FINCH; FLYING H RANCH, INC.; ERNEST FORD; WAYNE FRANCIS; FRIEND'S
9 RANCHES, INC.; JOHN GALASKA; RICHARD GILLELAND; JURGEN GRAMCKOW and
10 GERALDINE GRAMCKOW, individually as Trustees of the J&G Trust; GRIDLEY ROAD
11 WATER GROUP; STEPHANIE GUSTAFSON; LAWRENCE HARTMANN; HERMITAGE
12 MUTUAL WATER COMPANY; DOROTHY HOLMES; STEPHEN HUYLER; CHERYL
13 JENSEN; BRETT KANTROWITZ; DENISE KANTROWITZ; JERRY KENTON; OLE
14 KONIG; KROTONA INSTITUTE OF THEOSOPHY; TIM KROUT; BETINA LA PLANTE;
15 LUTHERAN CHURCH OF THE HOLY CROSS OF OJAI; SCOTT LUTTENBERG; JEFFREY
16 LUTTRULL; MEINERS OAKS WATER DISTRICT; FREDRICK MENNINGER;
17 MARGARET MENNINGER; STEPHEN MITCHELL; BILL MOSES; NORTH FORK
18 SPRINGS MUTUAL WATER COMPANY; OJAI WATER CONSERVATION DISTRICT;
19 OLD CREEK ROAD MUTUAL WATER COMPANY; RANCHO DE CIELO MUTUAL
20 WATER COMPANY; RANCHO MATILIJA MUTUAL WATER COMPANY; SHLOMO RAZ;
21 SYLVIA RAZ; RINCON WATER AND ROAD WORKS; CHARLES RUDD; WILLIAM
22 RUSIN; MARK SALEH; SENIOR CANYON MUTUAL WATER COMPANY; SIETE
23 ROBLES MUTUAL WATER COMPANY; SISAR MUTUAL WATER COMPANY; SOULE
24 PARK GOLF COURSE, LTD.; ST. JOSEPH'S ASSOCIATES OF OJAI, CALIFORNIA, INC.;
25 ANDREW STASSE; GEORGE S. STUART; JOHN TAFT; TELOS, LLC; THACHER CREEK
26 CITRUS, LLC, a California Corporation; THE THACHER SCHOOL; TICO MUTUAL WATER
27 COMPANY; VICTOR TIMAR; TOPA TOPA RANCH COMPANY, LLC; LOU TOMESETTA;
28 JOHN TOWN; TRUDIE TOWN; ERNESTO VEGA; VENTURA COUNTY WATERSHED

1 PROTECTION DISTRICT; VENTURA RIVER WATER DISTRICT; WOOD-CLAEYSSSENS
2 FOUNDATION; CALVIN ZARA [collectively, “Original Cross-Defendants”];
3
4 1970 RANCH ROAD, LLC; 625 N. VENTURES AVENUE, LLC; ABRAHAM MUNOZ;
5 AHDE and GANEA LAHTI, individually; ALAN and CAROL JAMES, individually;
6 ALESSANDRO LOBBA and MARY E. JACKSON, individually as Trustees of the LOOBA-
7 JACKSON FAMILY Trust; ALEXANDER and MARIA DORAN, individually; ALFREDO and
8 MONTELLE BELLO, individually; ALVIN and CLAUDIA CUNNINGHAM, individually;
9 AMERICAN RETIREMENT FUND, INC.; AMY MATTISON, Trustee of the Amy K. Mattison
10 Trust; ANATOLY and MARGARITA KOZUSHIN, individually; ANDREW and JANE
11 HOLGUIN, individually; ANDREW D. WEST and PATRICIA G. WEST, individually as
12 Trustees of the West Family Revocable Trust; ANGIE MARI GANASEI and CHRISTOPHER
13 PAUL DANCH, individually as Trustees of the Genasei-Danch Family Trust; ANNE
14 LOMBARD and FRANK HANSON, individually; ARMANDO and SENDI SANCHEZ,
15 individually; ARTHUR TIMOTHY and MAURYA KATHLEEN FOY, individually; ASHLEN
16 and IVY AQUILA, individually; AUBREY BALKIND; AUBURN OAK BUILDERS, INC.;
17 BARRY and ANGELA ROSS, individually; BEHROOZ JADIDOLLAHI; BENJAMIN and
18 STACEY VAIL, individually; BERKLEY and SUZANNE BAKER, individually; BETTINA
19 CHANDLER, Trustee of the Bettina Chandler Trust; BLANCHE CHAPLER; BRADFORD and
20 CHERYL BOYD, individually; BRENT and SHANNA MUTH, individually; BRIAN and
21 IRENE MCCONVILLE, individually; BRIAN and JOAN ARCHER, individually; BRIAN and
22 SHARON SMITH, individually; BRIAN S. STAFFORD and JANICE M. THOMAS,
23 individually as Trustees of the Stafford Thomas Family Trust Est., March 22, 2019; BRIAN
24 SKAGGS, Trustee of the Skaggs Trust; BRIGITTE LOVELL, Trustee of the Lovell Living Trust;
25 BRUCE ABBOTT and KATHLEEN QUINLAN, individually; BRUCE and DIXIE
26 GLADSTONE, individually; BRYAN WHITLEY; BRYCE and KRISTA BELGUM,
27 individually; CARL and BARBARA ENSON, individually; CARMEN CHAVEZ and
28 GUADALUPE PATINO, individually; CAROL NICHOLSON; CAROL ANN TENNANT,

1 Trustee of the Carol McDonnell Family Trust; CARRIE MURPHY and MICHAEL E.
2 TEMPLIN, individually as Trustees of the Templin-Murphy 2016 Living Trust; CARTIN
3 FAMILY, LLC; CATHERINE E. LEE, Trustee of the Catherine E. Lee Trust; CHAD
4 WESCOTT and HEATHER CUSHNIE WESCOTT, individually; CHARLINE L. RICH and
5 RICHARD GIBSON JR., individually; CHARLES E. STARBUCK, Trustee of the Charles E.
6 Starbuck Trust; CHARLES P. WATLING, Trustee of the First Charles P. Watling Family Trust;
7 CHRISTOPHER and TINA ABE, individually; CHRISTOPHER HART; CHRISTOPHER
8 MOORE and MARY MOORE, individually as Trustees of the Christopher Moore and Mary
9 Moore Trust; CLAIR and STACEY HARDING, individually; CLAUDIA ZENOBIA LINARTE,
10 Trustee of the Olga Trust; CLAUDIO and MAGDALENA LANDEROS, individually;
11 COMMUNITY MEMORIAL HEALTH SYSTEM; CONNIE S. MORGAN, Trustee of the
12 Connie S Morgan Trust; CONSERVATION ENDOWMENT FUND; CONSTANCE and
13 JUSTIN CAMPBELL, individually; CORINNE ANNE FRAUND; CRAIG and ANA ZWIRN,
14 individually; CURTIS and ORY NAMES, individually; CYNTHIA LEE, Trustee of the Cynthia
15 Lee Family Trust; D & J CAMPBELL BEST, LLC; DAN NEWMAN; DAN STUART, Trustee
16 of the Dana Stuart Trust; DAN WISEMAN; DANA and DAWN CENICEROS, individually;
17 DANIEL and AMY YANEZ, individually; DANIEL and NANCY MCLAREN, individually;
18 DANIEL and ROSALIND GRIMM, individually; DANNY BROADHURST; DARREN and
19 LISA LISLE, individually; DAVID FRIEND and ANGELA MARIE FRIEND, individually;
20 DAVID and LINDA SMITH, individually; DAVID and PATTI WICKLUND, individually;
21 DAVID CHASE and ANNE FITZGERALD, individually; DAVID E. SISSUM, JR. and DIANA
22 E. SISSUM, individually as Trustees of the Sissum Trust; DAVID FLICK and EMMA FLICK,
23 individually; DAWN and MARK GOLDEN, individually; DB PROPERTIES, LLC; DEL
24 CIELO, LLC; DENNIS and SUSAN RYDER, individually; DENNIS BROWN; DENNIS
25 WOOD and MARGARET VIGIL WOOD, individually; DIANE RUTH WHITE, Trustee of the
26 Diane Ruth White Living Trust; DIVE DEEP, LLC; DONALD and WENDY GIVENS,
27 individually; DONALD CAMPBELL; DONNA and JAMES KLEEBURG, individually;
28 DOROTHY HOLMES, Trustee of the Holmes Trust; DOROTHY LANQUIST; DOUGLAS

1 FREEMAN and MIRANDA MARGETTS, individually; DZ SPE, LLC; EARL G. HOLDER,
2 Trustee of the Holder Survivors Trust; EDWARD and GERALDINE LEE, individually;
3 EDWARD C. LEICHT and JACQUELINE M. LEICHT, individually as Trustees of the Leicht
4 Family 2013 Revocable Trust; ELEANOR SMALL; ELENA DHYANSKY, Trustee of the Elena
5 Dhyansky Trust; ELIZABETH KEENEN; ELTON PEDERSEN and ALMA CLAYTON
6 PEDERSEN, individually; ERIC and JODI PERDUE, individually; ERIC and MING JUN
7 NAKAMURA, individually; ERIC and TRISHA JOHNSON, individually; ERIC LAWRENCE
8 BERNTHAL, SPECIAL Trustee of the Boss and Venice Trust; ERIC LEWIS and BOBBI
9 RODERICK LEWIS, individually; ERIK and TIRICA EADS, individually; EUGENE and
10 CHARLOTTE ELERDING, individually; EVELYN FRAMENT; FORTUNE BUILDERS, INC.;
11 FRANK ROBERT WALKER JR. and CARRIE ELLEN WALKER, individually as Co-Trustees
12 of the Walker Jr. Living Trust; FREDERICK and LORI PONCE, individually; GALEN and
13 MARIA DAVID, individually; GARY HIRSCHKRON, Trustee of the Gary Hirschcron
14 Revocable Trust; GARY L. WOLFE, SUCCESSOR Trustee of the Carolyn M. Tastad Revocable
15 Trust; GARY and TERRI MCCASKILL, individually as Trustees of the Mccaskill Family Trust;
16 GARY SPEEDS and LISA R. KIRBY, individually as Trustees of the Gary Speeds and Lisa
17 Kirby Family Trust; GELB ENTERPRISES; GEORGE and PAMELA ZELLER, individually;
18 GEORGE and ROXANNE PELT, individually; GEORGE HERNANDEZ; GEORGE
19 LAWHEAD, Trustee of the George and Carole Lawhead Revocable Trust; GIRL SCOUTS OF
20 CALIFORNIA'S CENTRAL COAST; GLENN and LORI AHLBERG, individually; GORDON
21 and PATRICIA BLACK, individually; GRALAR, LLC; GRAYDON and HELEN HARRAH,
22 individually; GREGORY and MICHELE HAMMED, individually; GREGORY CAVETTE;
23 GREGORY GRANT and MARY KING, individually; HANS and ANNIKA GRUENN,
24 individually; HENDRIKA MARIA VON HECHT; HENRY and GENEVA OLIVA, individually;
25 HENRY and LESLIE SOHM, individually; HOWARD and IRENE HOOS, individually; HUGH
26 and LINDSAY THOMSON, individually; INTELL VENTURA, LLC; IRMA TRACY; JACKIE
27 M. SPRINGER, Trustee of the Jackie M. and Lanie Jo Springer Trust; JAMES and ANDREA
28 PENDLETON, individually; JAMES and GAYLE DAVID, individually; JAMES and STACI

1 VALENCIA, individually; JAMES and SUE MILLS, individually; JAMES and TRISHA
2 PROUD, individually; JAMES and ZELDA CARR, individually; JAMES PECK; JAMES I. PIO,
3 Trustee of the James I. Pio Trust; JAN M. HIESTER, Trustee of the Jan M. Hiester 2014 Living
4 Trust; JANE E. HANCHETT, Trustee of the Hanchett Family Trust; JANE SPILLER, Trustee of
5 the Jane Spiller Trust; JANET LEWIS, Trustee of the Janet T. Lewis Family Trust; JANET
6 PECK, Trustee of the Janet Lee Peck Living Trust; JEANNETTE CURTIS; JEFFREY E.
7 FRANK, Trustee of the Frank Trust; JEFFREY TUBBS and LYNN DUBOWY DURAN,
8 individually; JENNIE SCOTT, Trustee of the Jennie Scott Family Trust; JENNIFER WARE and
9 JAMIE SELBY, individually; JEREMY AUGUST and ICOLE MARIE FERRO, individually;
10 JESSE WADSWORTH and SUSAN HYND, individually; JESUS CORNEJO and IDANIA
11 YUDITH CORNEJO, individually; JOAN KENTON, Trustee of the Joan Kenton Living Trust;
12 JOANNA POPE; JOEL HERNANDEZ; JOHANNA COLLINS; JOHN and LISA DILLARD,
13 individually; JOHN and MARI ALLEN, individually; JOHN and NANCY BEVANS,
14 individually; JOHN and NILA VENTRESS, individually; JOHN EDWARD and EVONNE
15 LOUISE VACCA, individually; JOHN GUTIERREZ; JOHN MAZZOLA and APRIL GOLDEN,
16 individually; JOHN TAFT CORPORATION; JON HANSON; JONATHAN and JACQUELINE
17 PARKER, individually; JONATHAN and JULIE TEICHERT, individually; JOSE JUAREZ and
18 ANA VALENCIA, individually; JOSE VALADEZ and NORMA HERNANDEZ, individually;
19 JOSEPH PALMOUTSOS as Trustee of the Joseph Constantinos Palmoutsos Living Trust;
20 JOSEPH POLITO, Trustee of the Joseph R Polito 1989 Trust; JOSHUA ANTELMAN; JOYCE
21 FRENETTE; JUAN ESPINOZA and TRAVIS COKER, individually; JUANA and HENRY
22 MURILLO; individually; JUNE M. SPAR, Trustee of the June M. Spar Living Trust; JUSTIN
23 and RACHAEL JAYNE, individually; KAREN MENDOZA, Trustee of the Vork Family Trust;
24 KATHERINE PATTON and VIRGINIA MCCONNELL, individually; KATHLEEN TURNER
25 and ELIZABETH RENN, individually; KAY BURNS; KEN COLLIN; KENNETH and MARIA
26 BAKER, individually; KENNETH S. COLLINS, Trustee of the Frank R. Walker, Jr. Trust;
27 KENT and PATRICIA HARDLEY, individually; KEVIN K. COX and MARY C. COX,
28 individually as Trustees of the Cox Family Trust; KIM JIRKA, Trustee of the Kim Jirka Trust;

1 KONSTANTIN DEMIDOV, individually; KYLE BROWN; LANCE and DONELLE
2 WOLESAGLE, individually; LARRY and CECILIA HICKOK, LARRY HUBENTHAL,
3 individually and as Trustee of the Larry Hubenthal Living Trust; individually; LASZLO and
4 SHARON BIHARI, individually; LASZLO ENGELMAN, Trustee of the Engeman Family Trust;
5 LAUGHING DOG RANCH, LLC; LAVERNE M. BROWNING; LAWRENCE and RACHEL
6 CLEVENSON, individually; LEON and CECILIA CARTER, individually; LEONARD
7 FISCHER; LORENZO GAMA and YLDA CISNERO, individually; LORETTA May
8 WILLIAMS, Trustee of the Loretta May Williams Revocable Living Trust; LUCILLE JANE
9 CONFORTI and RANDALL NORMAN KIRK, individually as Co-Trustees of the "Lucille Jane
10 Conforti Trust"; LYNN and ANN HENNE, individually; LYNN GOTCH and LINDA OLIVER,
11 individually; MANUEL and SANDY GARCIA, individually; MARILYN WALLACE, Trustee
12 of the MARILYN Wallace Separate Property Trust; MARIO AGUIRRE and PATRICE
13 VERNAND, individually; MARK and MEGAN STEFFY, individually; MARK ANTHONY and
14 KIM MARIE CRANE, individually; MARK ROBBINS, Trustee of the MARK ROBBINS Trust;
15 MARTIN and DARIAN O'BRIEN, individually; MARTIN and LINDA GRAMCKOW,
16 individually; MARTIN GRAMCKOW, Trustee of the Monika G. Huss Irrevocable Trust, Trustee
17 of the Karin W. Gramckow Irrevocable Trust, Trustee of the Kurt J. Gramckow Irrevocable Trust;
18 MARVEL PIERCE; MARYANN HEPP HILL, Trustee of the Hill Family Trust; MARY
19 BERGEN, Trustee of the Rosemary Hall Bergen Trust; MARY MORRISON; MARY
20 WALKART and WILLIAM HASTINGS, individually; MATILJA CANYON ALLIANCE;
21 MATTHEW and CLAUDIA WILSON, individually; MATTHEW ARREOLA; MATTHEW
22 BOWE; MATTHEW DWYER and COLLEEN WALKER, individually; MATTHEW LARREW
23 and JORDANA KABAN, individually; MATTHEW SIMON and AMANDA VINO,
24 individually; MICHAEL and CAROL DAVIS, individually; MICHAEL and CINDY BOEHM,
25 individually; MICHAEL and HANNALORE GRESSER, individually; MICHAEL and KATHY
26 OGDEN, individually; MICHAEL and KIM REGAN, individually; MICHAEL and MARIE
27 MCTAVISH, individually; MICHAEL and PATRICIA MCWEENEY, individually; MICHAEL
28 COGGINS JR. and CYNTHIA COGGINS, individually; MICHAEL GREYNALD, Trustee of

1 the Greynald Family Trust; MICHAEL L. ROCKHOLD, Trustee of the Michael Rockhold Trust;
2 MICHAEL TELLO; MICHELE WILLIS and JOHANNA COLLINS, individually; MIGUEL A.
3 MAYORGA, Trustee of the Edward R. Mayorga Living Trust; MITCHAEAL and RUBEENA
4 BREESE, individually; MITCHELL and ANA YOUNT, individually; MITCHELL and JOY
5 DALBEY, individually; MITCHELL and LISA MYERS, individually; NANCY MOORE,
6 Trustee of the Nancy Anne Moore Separate Property Trust; NIKOLAS and JULIA KRANKL,
7 individually; OFFSHORE CRANE, INC.; OFFSHORE CRANE and SERVICE COMPANY,
8 INC.; OFFSHORE FACILITIES; OJAI VALLEY CONSERVANCY; ORVILLE and MARION
9 HERNVALL, individually; ORVILLE and PAMELA HIBDON, individually; OSWALDO and
10 NORMA RUIZ, individually; PACIFIC TELEPHONE AND TELEGRAPH COMPANY;
11 PAMELA WOOD; PATRIC and MARGARET PEAKE, individually; PATRICIA and
12 EDWARD LANSBERG, individually; PATRICIA CUENOT; PATRICK and CATHY
13 PAGNUSAT, individually; PAUL and ANGELA BOOTH, individually; PAUL and ASHLEY
14 RAMSEY, individually; PAUL and MARIA LOZANO, individually; PAUL and MARTHA
15 MEDLAR, individually; PAUL and OPAL SKAGGS, individually; PETER and KELLI
16 FREIBERG, individually; PETER and ROBIN SHEDLOSKY, individually; PETER BROOKS
17 and CARLA BROOKS, individually and as Trustees of the Escoda Brooks Family Trust; PETER
18 CAMBIER, Trustee of the Peter and Marilyn Cambier Trust; PETER SCHEY, LLC; PEUVLIN
19 VONG; PHILIP and DELIA SMITH, individually; PHILIP FERRANTE JR. and NICOLE
20 AVERSA-FERRANTE, individually; PHILIPPE ROUSSEAU and KIMBERLY SHOBE,
21 individually; PHYLLIS COURTNEY; RAFAEL HERNANDEZ; RAMONA L. ANDREW,
22 Trustee of the Ramona L. Andrews Trust; RANCHO ARNAZ, LLC; RANCHO CASITAS, LLC;
23 RANCHO SUENO, LLC; RAY and CAROLINA GUILLEN, individually; RAYMOND and
24 ANNETTE WEST, individually; RICHARD and LAURA MANCILLA, individually; RICHARD
25 and ALEXANDRA DUBEAU, individually; RICHARD and CYNTHIA ROBINETT,
26 individually; RICHARD BOLTON; RICHARD MATHIEU and CLAUDIA HERRERA
27 MATHIEU, individually; RICHARD MICHAEL and MARGARET KENNY, individually;
28 RICHARD WILES and PEGGY CAREY, individually; ROBERT ALAN and STACEY JEAN

1 BOYD, individually; ROBERT and CAROLYN JARBOE, individually; ROBERT and JUDITH
2 CLARK, individually; ROBERT and NICKEY GREGORY, individually; ROBERT and
3 PATRICIA MCFALL, individually; ROBERT and SUSAN BENNITT, individually; ROBERT
4 and ANNA J. AURIC, individually as Trustees of the Auric Revocable Trust of 1999; ROBERT
5 LEVIN and LISA SOLINAS, individually; ROBERT MARK and LORRAINE MELISA
6 LOVATO, individually; ROBERT OCONNOR; ROBERT PETRIN and BEATE
7 SCHICKERLING, individually; ROBERT L. STONE, Trustee of the Robert L. Stone Revocable
8 Living Trust; ROBERT S. YOUNG, Trustee of the Young Trust; RONALD and JANIS
9 CALKINS, individually; RONALD KAPLAN and CYNTHIA DANIELS, individually;
10 RUDOLPH and CAROL SALDAMANDO, individually; RUSSELL JAMES HALL, Trustee of
11 the Russell James Hall Family Trust; SAM and DEBBIE TUCKER, individually; SCOTT ALAN
12 and EVA PRINCE WEISS, individually; SCOTT and AKI FRESHMAN, individually; SCOTT
13 and BERNADETTE KING, individually; SCOTT and SARAH MCKAY, individually; SCOTT
14 GREGORY EROCKSON and HANNAH BETH GUZIK, individually; SCOTT R. JOHNSON
15 and MARGARET BATES, individually; SERAFIN CALDERON and BLANCA ORTIZ;
16 individually; SHANE and AMY WATKINS, individually; SHANE NASH; SHARON and
17 BRUCE SPENCER, individually; SHARON BROWN, Trustee of the Sharon Brown Living
18 Trust; SHAUN and DAISY GARMAN, individually; SHIRLEY M. PALMER, Trustee of the
19 Shirley Palmer Revocable Trust; SOCIETE D'INVESTISSEMENT IMMOBILIERS ET
20 FINANCIERS FRANCO-ALLEMAND, a French corporation; STANLEY STEPHEN
21 ROSLANSKY and LINDA ROSLANSKY, individually as Trustees of the Roslansky Family
22 Trust; STEPHEN and CARIN KALLY, individually; STEPHEN and CINDY BARRACK,
23 individually; STEPHEN CARR and DEBRA GILL, individually; STEPHEN M. JOHNSON,
24 Trustee of the Stephen M. Johnson Living Trust; STEPHEN SANFORD; STEPHEN ZANE
25 FRASER; STUART and NANCY RUPP, individually; SUDARSHAN GAUTAM; SUSAN
26 GARY; SUSAN M. RALPH, Trustee of the Ralph Trust; SUSAN YARNELL; SUSHMA
27 GUJRAL; SUZANNE RHODES, Trustee of the Bateman-Rhodes Family Trust; TAMARRA
28 BARBEY; TANE CHARLES ARNOLD, individually, and as Trustee of the Tane C. Arnold

1 2006 Living Trust TEEN CHALLENGE OF SOUTHERN CALIFORNIA, INC; TERRA
2 CROWLEY; TERRANCE O'CONNOR and KATHY FRANKLIN, individually; THE
3 BAPTISTE FOUNDATION; THE OJAI VALLEY LAND CONSERVANCY; THEODORE and
4 JUDY LUCAS, individually; THEODORE and NORMA SCHNEIDER, individually;
5 THEODORE WILLIS, JR. and PEARL B. MALOS, individually; THEODORE and TRACY
6 MANDRYK, individually; THEODORE and PEARL MALOS, individually and as Trustees of
7 the Malos Family Trust; THOMAS and CHRISTINE REED, individually; THOMAS and NIKKI
8 YOUNG, individually; TIMOTHY and NICOLE BECKETT, individually; TOBIAS and TANIA
9 PARKER, individually; TODD HENARD and KIBHI MARIE HENARD, individually;
10 TROPICO, LLC; VICTOR and SHERYL SANCHEZ, individually; VICTORIA and JOHN
11 JUNKIN, individually; VIDA VIDA, Trustee of the VIDA FAMILY Trust; VIJAY and NEETA
12 PATEL, individually; VIRGINIA I. WILLIAMSON, individually, and as Trustee of Trust of
13 Virginia I. Williamson; VIRGINIA TREVINO; WALID A. ALAWAR, Trustee of the Walid A.
14 Alawar Living Trust; WARREN HEATH; WILLIAM and CHERYL MEADE, individually;
15 WILLIAM and HELEN PECK, individually; WILLIAM and IRENE SNIVELY, individually;
16 WILLIAM and KIMBRA CARNAGHE, individually; WILLIAM and PAULA STEVENS,
17 individually; WILLIAM LOUGHBORO; WILLIAM STARR; YONG YI; YVETTE MARIE and
18 DANIEL JOSEPH SINOHUI, individually; ZACHARY and DIANE TOTTEN, individually
19 [collectively, "Riparian Landowners"];

20
21 1300 SHIPPEE LANE, LLC; 3584 CALLE MORENO, LLC; AARON and ANGELA
22 HOEKSTRA, individually; ABEL and LOURDES CARRANZA, individually; ACSLAYTON,
23 LLC; ADAM CASEY and BRITTANY CHISUM, individually; ADAM DISTL, JR. and
24 BARBARA B. DISTL, individually as Trustees of the Adam Distl, Jr. And Barbara B. Distl 1998
25 Revocable Trust; ADRIAN OGDEN; AERA ENERGY, LLC; AJR INVESTMENT
26 PARTNERSHIP, LP; ALAN and DEBORAH SHARON, individually; ALAN and LESLIE
27 CONNELL, individually; ALAN and MARY KIRBY, individually; ALAN and SUSAN ECKER,
28 individually; ALAN WALBRIDGE and DOROTHY FAY WALBRIDGE, individually;

1 ALBERTO and ADRIANA MONTANO, individually; ALBERTO and HILDA ZAMORA,
2 individually; ALBINE HOPCUS and ALVA LYDIA HOPCUS, individually as Trustees of the
3 Al and Alva Trust; ALFONSO and ALEJANDRA LIMON, individually; ALLAN and JANIS
4 PARKHURST, individually; ALLAN and KATHARINE PARIGIAN, individually; ALLAN and
5 MARY DOANE, individually; ALLEN VAIL; ALVARO and ELVA RUIZ, individually;
6 ALVIN and CLAUDIA CUNNINGHAM, individually; ANA CROSS, Trustee of the ANA
7 CROSS FAMILY Trust; ANDRE KEUNZLI and FABRIENNE KEUNZLI-MONARD,
8 individually; ANDREW and MELISSA MACCALLA, individually; ANDREW and REBECCA
9 CHANDLER, individually; ANDREW and SHARON ENGEL, individually; ANGELA JAYNE
10 GARDNER and JOHN PERCIVAL MAWSON, individually as Trustees of the Pleasant Avenue
11 Living Trust; ANITA J. DIAZ; ANN H. DONLON, Trustee of the Ann H. Donlon Revocable
12 Trust; ANNA ARCHER; ANNA KIRKWOOD; ANNE and DANIEL GOLDSTEIN,
13 individually; ARNE ANSELM, Trustee of the Velderrain M. Trust; ANSON B. THACHER and
14 ANNE F. THACHER, individually as Trustees of the A. and A. Thacher Living Trust;
15 ANTHONY BECCHIO and DENISE HEIMO, individually; ANTHONY MASIEL; ANTONIO
16 ESPINO and MARIA TORRES, individually; ARNE ANSELM and MICHELLE
17 VELDERRAIN, individually; ARNE ANSELM, Trustee of the Velderrain M. Trust; ASHLEY
18 and VICTORIA EDWARDS, individually; BALDEMAR ALCANTAR and MICAELA ORTIZ
19 ALCANTAR, individually; BARBARA A. FITZGERALD, Trustee of the Fitzgerald 1994 Trust;
20 BARBARA BONSIGNORI; BARBARA CHEN LOWENTHA, Trustee of the 2017 Barbara Kay
21 Chen Lowenthal Revocable Trust; BARBARA HALL, Trustee of the Barbara Hall Living Trust;
22 BARNARD PROPERTIES, LLC; BART KENNEDY; BARTON KENNEDY; BERNARD
23 MARTIN; BETH E. LINDLEY; BETTYANN SESSING; BIG BLACK DOG, LLC; BLAZE
24 BUONPANE; BRADLEY and ANDREA ROE, individually; BRADLEY and IVELOU
25 PANTOSKEY, individually; BRANDON and TRESSA KAHLER, individually; BRANDON and
26 KELSIE SCHNEIDER, individually and as Trustees of the Brandon Schneider and Kelsie
27 Simms-Schneider Family Trust; BREAL and KAREN ROWE, individually; BRENDAN
28 RICHARD and CHRISTA LEE DAWN FREEMAN, individually; BRENT and PAMELA

1 LAMO, individually; BRETT and LYNN WILSON, individually; BRETT CUNNINGHAM;
2 BRETT NICHOLSON and NAN DAVIS, individually; BRIAN and CYNTHIA MCDANIEL,
3 individually; BRIAN and ERIN EDWARDS, individually; BRIAN and JEAN HARRISON,
4 individually; BRIAN and MARIE HAASE, individually; BRIAN and SIOBHAN CALVIN,
5 individually; BRIAN A. SCHAFFELS; BRIAN OSBORNE and KIRSTEN HINRICHS,
6 individually; BRITTANY and ALAN FLETCHER, individually; BRUCE and LESLIE
7 BOUCHE, individually; BRUCE and VIRGINIA HIBBERD, individually; BRUCE C.
8 BROCKMAN and BRIDGET TSAO-BROCKMAN, individually as Trustees of the Tsao
9 Brockman Family Trust; BRYAN and NICOLE CRAWFORD, individually; BULMARO and
10 ALFONSA PENA, individually; BYRON and JENNIFER GREENE, individually; BYRON
11 RADER and MYRA TOTH, individually; CAL B. LAND CO., LLC; CALATLANTIC GROUP
12 INC.; CAMP RAMAH IN CALIFORNIA INC.; CARL and JUDITH BELL, individually; CARL
13 and LEIGH HYNDMAN, individually; CARL GADDIS and ANNA HICKS, individually;
14 CARLA DENNIS, Trustee of the Carla D. Dennis Trust; CARLA MELSON and CARLA J.
15 MELSON, individually as Trustees of the Carla J. Melson Revocable Living Trust; CARMEN
16 and CAROLINA MURILLO, individually; CAROL MARQUEZ-OLSON, Trustee of the Carol
17 Marquez-Olson Trust; CAROL VESECKY, Trustee of the Carol B. Vesecky Revocable Living
18 Trust; CAROLINE TURNER, Trustee of the Turner Survivors Trust; CAROLYN BOWMAN,
19 Trustee of the Carolyn Bowman 2008 Trust; CAROLYN HUIISH; CARYN MOLINELLI;
20 CATHERINE LANCASTER; CATHERINE SELLMAN; CATHERINE SMITH, Trustee of the
21 Catherine L. Smith Revocable Trust; CESAR and DAVIENNE GUERRA, individually; CESAR
22 JIMENEZ and AURA MINERA, individually; CHAARENNE TORRIS and RAYMOND
23 BRADLEY, individually; SOUTHERN CALIFORNIA ASSOCIATION OF SEVENTH DAY
24 ADVENTISTS; CHAD CARPER; CHAD RESS and STEPHANIE WASHBURN, individually;
25 CHAD VICK, Trustee of the Chad C. Vick Trust; CHARLENE VAN DEUSEN; CHARLES and
26 DEANA SHERRY, individually; CHARLES and JO BENNETT, individually; CHARLES G.
27 BARNETT, SUCCESSOR Trustee of the "Barnett Family Exemption Equivalent Trust";
28 CHARLES L. HOFF and KATHLEEN D. HOFF, Co-Trustees of the Hoff Revocable Trust;

1 CHARLES MONN and ELENA HALE, individually; CHARLES R. RUDD and LOLA L.
2 RUDD, Trustees Under the Charles R. Rudd and Lola L. Rudd Trust; CHRISTIE MATTULL,
3 Trustee of the Christie Lynn Mattull Trust; CHRISTINE and DONALD BOWEN, individually;
4 CHRISTINE GOLDEN; CHRISTOPHER and ANNA RHODA, individually; CHRISTOPHER
5 and GILLIAN BORGESON, individually; CHRISTOPHER and SHELAGH DUKE,
6 individually; CHRISTOPHER CORSONES, Trustee of the Christopher Corsones Living Trust;
7 CHRISTOPHER MCGUIRE; CHRISTOPHER SEWELL; CHRISTOPHER WEINER and
8 DAMIAN BOURGUET, individually; CINDY BURKHART, Trustee of the Cindy Burkhardt
9 Living Trust; CITY OF OJAI; CLAUDIA FARR, Trustee of the Sam S. Farr And Claudia S. Farr
10 Trust; CLAUDIA WUNDERLICH, Trustee of the Claudia A Wunderlich Trust; CLEMENTINE
11 TURNER, Trustee of the Clementine Turner Living Trust; CODY GREEN; CODY STEVENS;
12 CONNIE ANAISE; CONNIE CLINE, Trustee of the Mark Terry Cline Family Trust;
13 CONSTANCE EATON; CORY and NICHOLAS WINGATE, individually; COUNTY OF
14 VENTURA; CRAIG and STEPHANIE GARDNER, individually; CRAIG YOUNG and
15 DANIEL POLING, individually; CULBERT FAMILY PARTNERSHIP; CURTIS and
16 CHRISTINA TOLMIE, individually; CYNTHIA ELLIS and PAMELA THOMAS, individually;
17 DAJ PROPERTIES, LLC; DAMIAN and LORIE VOS, individually; DAMON and ANNE
18 BRINK, individually; DANIEL and ADAYA WALSH, individually; DANIEL and DEBORAH
19 HOYT, individually; DANIEL and ELIZABETH GEORGE, individually; DANIEL and
20 ELIZABETH MCLAUGHLIN, individually; DANIEL and JANE KELLY, individually;
21 DANIEL and LYDIA RUARK, individually; DANIEL and RALPH FAIRBANKS, individually;
22 DANIEL and TOMICA MORA, individually; DANIEL and YOKO MCSWEENEY,
23 individually; DANIEL CHRYNKO; DANIEL CRANE; DANIEL H. I. and WILLIAM D.
24 MOSES JR., individually as Trustees of the William D. Moses, Jr. Separate Trust No. 1;
25 DANIEL HULTGEN, Trustee of the Hultgen Living Trust; DANNY HAAR and MARISKA DE
26 FEITER, individually; DARRELL RALSTON, Trustee of the Darrell Anthony Ralston 2009
27 Revocable Trust; DAVE and KATHLEEN TARRATS, individually; DAVID and BEVERLY
28 FULTON, individually; DAVID and CAROL CINTRON, individually; DAVID and DEBORAH

1 TODD, individually; DAVID and DONNA BERGER, individually; DAVID and ELIZABETH
2 SILVA, individually; DAVID and FERESCHTA SINCLAIR, individually; DAVID and KAREN
3 BRUBAKER, individually; DAVID and KATHLEEN OSTBY, individually; DAVID and
4 LAURA MEISCH, individually; DAVID and LAURIE MAHAN, individually; DAVID and
5 MEGHAN SANDOVAL, individually; DAVID and MINDY BENEZRA, individually; DAVID
6 and PEGGY STANWOOD, individually; DAVID and SANDRA MURILLO, individually;
7 DAVID and SHANNON RICHARD, individually; DAVID and SHARRON SPARKS,
8 individually; DAVID and STEPHANIE BERGER, individually; DAVID and TONI JOHNSON,
9 individually; DAVID COREY and JEAN SCHOLLES, individually; DAVID E. PRESSEY and
10 AGNES E. PRESSEY, individually as Trustees of the David E. And Agnes E. Pressey Family
11 Trust; DAVID KILLE and SHANNON FREW, individually; DAVID L. GARBER and
12 CYNTHIA GARBER, individually as Trustees of the Garber Trust; DAVID ORBACH and EVA
13 ARAUJO, individually; DAVID STANLEY and MONICA BEDNAR STANLEY, individually;
14 DAWN and BARCLAY HOPE, individually; DE and JACQUE PISCIOTTA, individually;
15 DEAN and GLORIA VADNAIS, individually; DEAN and LORINDA STRONG, individually;
16 DEANNA GONZALES, individually; DEIRDRE LYNDSEY, individually; DELAVAN C. GARST
17 and SHARON D. GARST, individually as Trustees of the Delavan and Sharon Garst Family
18 Trust; DELL and ANNE MERCER, individually; DELORES and JERRY BERLIN, individually;
19 DENISE WIZMAN, as Trustee of the Denise Wizman Revocable Trust; DENNIS and CHERYL
20 JACOBS, individually; DENNIS and NADINE CORTE, individually; DEREK MEEK; DEVON
21 and JILLIANN COLLINGE, individually; DIANA ENGLE, Trustee of the Diana L Engle
22 Revocable Trust; DIANA PERON, Trustee of the Diana C Peron Living Trust; DIANA
23 SYVERTSON, Trustee of the Diana Syvertson Living Trust; DIANA TRENT, Trustee of the
24 Diana Trent Living Trust; DIANE and WILLIAM CLEGG, individually; DIANNE
25 MCCOURTNEY, Trustee of the Dianne Louise McCartney Trust; DOLORES KEITH;
26 DOMINIC HABIBI; DONALD and CLARA TENPENNY, individually; DONALD BROSNAC
27 and TWILA CARLSEN, individually; DONALD DAVIS; DONALD G. and SUSAN B. DAVIS,
28 individually as Trustees of the Donald G. And Susan B. Davis Revocable Family Trust of 1997;

1 DONIS MONTOYA JR. and TERESITA MONTOYA, individually; DONNA DEITCH, Trustee
2 of the DONNA E. DEITCH Trust; DONNA EPSTEIN, Trustee of the Epstein Survivors' Trust,
3 Trustee of the Epstein Marital Trust, and Trustee of the Epstein Bypass Trust; DOROTHY and
4 JAMES KEHOE, individually; DORTHEA KECK; DOUGLAS and ANN PARENT,
5 individually; DOUGLAS and CLAUDIA WEBBER, individually; DOUGLAS and ELISABETH
6 VERNAND, individually; DOUGLAS and KATHLEEN LEIGHTON, individually; DOUGLAS
7 and MOIRA VOLPI, individually; DOUGLAS DRAPER; DOUGLAS WASSON, Trustee of the
8 Wasson Trust; DUSTIN BEILKE; ED and LINDA COLBY, individually; EDSON TAFT,
9 Trustee of the Edson B. Taft Revocable Trust; EDWARD and DEBORAH GUERRA,
10 individually; EDWARD and LAURA SAVALA, individually; EDWARD and NANCY
11 DENNIS, individually; EDWARD and NANCY NECKER, individually; EDWARD and
12 ROBERTA WALSH, individually; EDWARD DUNN and JUDITH SHELBY DUNN,
13 individually; EDWARD PRESSEY; EDWIN NORRIS PROCTER, Trustee of the "E. Norris
14 Procter Living Trust"; EILAM BYLE, Trustee of the Eilam Byle Living Trust; EILEEN
15 STERLING, Trustee of the Eileen M. Sterling Revocable Trust; EILEEN WALKER; EL
16 SERENO 1225, LLC; ELAIENE KEELEY, Trustee of the Elaiene Keeley Trust; ELAINE
17 FERGUSON; ELI and JESSICA NEIDERHISER; ELIA ALDAPA; ELIZABETH BAUER,
18 Trustee of the Elizabeth A Bauer Trust; ELLEN LEOPOLD; ELMER and JOAN SWIFT;
19 EMILY BENSON and LISA MARTEL, individually; EMILY CLAY and MATTHEW
20 GOODMAN, individually; ERBAY and VELDA GARCIA, individually; ERIC and ARLENE
21 SCHWERDTFEGER, individually; ERIC and JOLENE HARRINGTON, individually; ERIC
22 BUSH and CRAIG YOUNG, individually; ERIC DILKS, Trustee of the Eric M. Dilks 2004
23 Revocable Trust; ERIC GOODE; ERIC MOORE; ERIC ROSENBERG; ERNEST and
24 DOROTHY NICHOLS, individually; ERNEST THORNSBERRY, Trustee of the Ernest
25 Thornsberry Revocable Trust; ESPERANZA and SANDRA GUERRERO, individually;
26 EUGENIJUS VALIULIS, Trustee of the Eugenijus Valiulis Revocable Living Trust; EUSEBIO
27 and LORI NAVARRO, individually; EVELYN BARAN, Trustee of the Evelyn F Baran Personal
28 Residence Trust; EZEQUIEL and AMBER MONARREZ, individually; FELIX and DELMY

1 GARCIA, individually; FERNANDO PORRAS; FEROZ and MONA ZAIDI, individually;
2 FINCH FARMS, LLC; MEREWETHER JUDSON, LLC; FLOYD and CHARLENE
3 FITZGERALD, individually; FLOYD EUGENE WIANCKO and HIROKO WIANCKO,
4 Trustees of the Wiancko Family Trust; FOREST HOME, INC.; FORTUNE REAL ESTATE 888,
5 LLC; FRANCIS and SHAUNA LONGSTAFF, individually; FRANCISCO and ANGELICA
6 VALLES, individually; FRANK and LILA SHELSTREN, individually; FRANK C. URIAS and
7 EVANGELINE S. URIAS, individually as Trustees of the Urias Family Trust; FRANK
8 CHAROLLA; FRANK EDWARD SHELSTREN, JR., aka FRANK E. SHELSTREN and RITA
9 CHERYL SHELSTREM, individually as Trustees of the Shelstren Family Trust; FRED and
10 CARINE FISHER, individually; FRED and DONNA STEVENS, individually; FRED KRAMER
11 and MICHAELA WATKINS, individually; FREDERIC DEVAULT; FREDERICK and LAURA
12 FULMER, individually; FREDERICK SLOMAN and NORDI HINTZE, individually;
13 FREDRICK and ROXANNE BAKER, individually; FUTURE MHPS, LLC; GABRIEL and
14 MARGARITA MENDOZA, individually; GALE and BERNABE GAONA JR., individually;
15 GARY and CHARI PETROWSKI, individually; GARY and COLLEEN FRY, individually;
16 GARY and JOLENE CLARKE, individually; GARY and JUDITH STEVER, individually;
17 GARY and PATRICIA TUCKER, individually; GARY and TERESA DOWNARD, individually;
18 GENE and PATTY SAITO, individually; GENNEVA MASCHLER and RICHARD YACIUK,
19 individually; GEOFFREY and PAULA CLARKE, individually; GEOFFREY BROWN and
20 STEPHANIE GIBSON, individually; GEORGE and LINDA BOSTON, individually; GEORGE
21 and LYNN MALONE, individually; GEORGE and MARGARET MELTON, individually;
22 GEORGE and SIGRID BRESSLER, individually; GEORGE STUART; GERALD and
23 DARLENE CARLSON, individually; GERARD LINSMEIER; GERBEN and JILL HOEKSMAN,
24 individually; GINO LYNCH; GLENN MYERS, Trustee of the Glenn C. Myers Family Trust;
25 GORDON and TERRY HANUSEK, individually; GORDON GIBBONS, Trustee of the Gordon
26 R. Gibbons Living Trust; GRANT KEMP; GREG and JULIE TEBO, individually; GREGG and
27 ROSIE DIERICKX, individually; GREGG OLSON, Trustee of the Gregg W. Olson Revocable
28 Trust; GREGORY and KAORI GOLDEN, individually; GREGORY and MARTHA LEPINE,

1 individually; GREGORY and SARAH DELVECCHIO, individually; GREGORY and SUSAN
2 GILBERT, individually; GREGORY and SUSAN IGNACIO, individually; GREGORY and
3 SUZANNE COMBS; GREGORY HERAS and ROZANNE BONAVITO, individually;
4 GREGORY JOHNSON; GREGORY N. PIMSTONE and LAURYN B. HARRIS, individually as
5 Trustees of the Pimstone Family Trust; GRIFFIN and NICOLE WILLIAMSON, individually;
6 GUDAZ, LLC; GUNILD SEADRIFT; GUY and SHERI FLASCH, individually; GUY
7 BRATTON; H and BEVERLY LEARD, individually; HACIENDA LADERA, LLC; HANK and
8 ALANA GARCIA, individually; HANS and EILEEN VAN KOPPEN, individually; HARALD
9 WAGNER; HARLAN KOSSOW; HARRISON HILL and LAUREN WILSON, individually;
10 HARRY and MARILYN LEHR, individually; HARRY JOE; HAYDEN and RAQUEL WHITE,
11 individually; HECTOR and ROCIO TORRES, individually; HELIBERTA VALENCIA; HELP
12 OF OJAI, INC.; HENRY and MOIRA TARMY, individually; HERMANN and GAY
13 THOMSEN, individually; HICKEY BROS LAND CO. INC.; HOLLY BASSUK; HOWARD
14 and RUTH MILLER, individually; HOWARD ALTMAN, Trustee of the Gerta Maritz Trust;
15 HOYT TAROLA; IAN and CAROL ATKINSON, individually; IGNACIO and ROSE VEGA,
16 individually; IMELDA MARES, Trustee of the Imelda Mares Trust; INDUSTRIAL VENTURA;
17 INTEGRITAS OJAI, LLC; IRMA CRUZ; IRSHAD and LINDA HAQUE, individually; ISIDRO
18 SANCHEZ; J INVESTMENTS; J MCGLINCHEY; JACK and MARIE KENTON, individually;
19 JACK and SIMONE PATTERSON, individually; JACK and VERA TURBYVILLE,
20 individually; JACOB and ANJA ZIMMERMAN, individually; JACQUELINE DORFMAN,
21 Trustee of the Jacqueline Dorfman Revocable Living Trust; JACQUELINE URBAND; JAKOB
22 and MARIANNE VOS, individually; JAMES and ALISA VARNEY, individually; JAMES and
23 DANIELA CASEY, individually; JAMES and DORI SANDEFER, individually; JAMES and
24 JANET LECROY, individually; JAMES and LAURA FERNANDEZ, individually; JAMES and
25 MARYETTA SANDERS, individually; JAMES and PENNY HARVEY, individually; JAMES
26 and RANDI CATLETT, individually; JAMES and WENDY OSHER, individually; JAMES
27 DATA; JAMES FINLEY, Trustee of the James And M. Reen Finley Family Trust; JAMES
28 FINCH, Trustee of the Finch Family Trust; JAMES J. FINCH and LORRAINE HOLVE FINCH,

1 individually as Trustees of the James J. Finch and Loraine Holve Finch Living Trust; JAMES
2 PAUL FINCH; JAMES KIRK and JACELYN HAYES, individually; JAMES SELMAN, Trustee
3 of the JAMES C. SELMAN REVOCABLE INTER VIVOS Trust; JAMES W. COULTAS and
4 MARGARET COULTAS, Trustees of the James A. And Margaret H. Coultas Intervivos Trust;
5 TERRY COULTAS WILSON; JAMES W. COULTAS Trustee of the Coultas Living Trust; JAN
6 and PRISCILLA GRANADE, individually; JANE MCCORD, Trustee of the Jane Ann Mccord
7 Living Trust; JANET MCGINNIS, Trustee of the Janet Karen Mcginnis Trust; JANICE and
8 JESSE HILLESTAD, individually; JANICE HALL, Trustee of the HALL Trust; JANIS LONG
9 NICHOLAS and JESS E. LONG, individually as Co-Trustees of the Long Family Trust; JASON
10 and JENE LOOMIS, individually; JASON and KATHRYN HEADLEY, individually; JASON
11 and LANA SPEAR, individually; JASON LOOMIS; JASPER and JESSICA JONES,
12 individually; JAYNE PENDERGAST, Trustee of the 2014 Jayne E Pendergast Trust; JEFF and
13 CHEREE SIMONS, individually; JEFF and DESIREE WILBY, individually; JEFF MABRY;
14 JEFFERIE SKAGGS and TIMOTHY BUNCE, individually; JEFFREY and DENISE HELM,
15 individually; JEFFREY and DONNA MEYER, individually; JEFFREY and HOLLY LIEBER,
16 individually; JEFFREY JENSON; JEFFREY KENTON, Trustee of the Jeffrey T. Kenton 2004
17 Revocable Living Trust; JEFFREY S. BACON, Trustee of the Villa Nero Trust; JEFFREY
18 WEINSTEIN; JEFFRY and FIONA POUGHIER, individually; JENNIFER KISTLER, Trustee of
19 the Jennifer L Kistler Trust; JEREMY and BRITTANIA RENNIE, individually; JERI
20 LEONARD; JEROME H. HITTLEMAN and LYNNE M. GOLDFARB, Trustees of the Jerome
21 H. Hittleman And Lynne M. Goldfarb Revocable 2016 Trust; JERRY DEAN MINER and
22 GERALDINE ANN MINER, Trustees of the Miner Trust; JESS EARL LONG; JESSIE
23 STRICCHIOLA and ROSEMARY GARRISON, individually as Trustees of the Phoenix
24 Revocable Trust; JESUS and MARIA RAMOS, individually; JILL OLIVARES, Trustee of the
25 Jill Ann Olivares Revocable Living Trust; JIMMY and THERESA RAMIREZ, individually; JLB
26 RANCHO VISTA, LLC; JOAN GEDDES and JOHN SALUPPO, individually; JOAN ROBLES;
27 JOANN BENSON, Trustee of the Joann Alva Benson Revocable Living Trust; JOANNE
28 BARNES, Trustee of the Barnes Family Trust; JOEL FOX and JENNIFER DAY, individually;

1 JOEL VUYLSTEKE, Trustee of the Country Club Trust; JOHANNA RAE LONG; JOHN and A.
2 ELROD, individually; JOHN and ALITEA MARUSZEWSKI, individually; JOHN and
3 CRYSTAL PEAKES, individually; JOHN and JANIS NICHOLAS, individually; JOHN and
4 LUCILLE ELROD, individually; JOHN and MONICA HARTMANN, individually; JOHN and
5 NORMA CURTIS, individually; JOHN and PARRIS COLLINS, individually; JOHN and
6 PATRICIA ESSICK, individually; JOHN and TONYA PERALTA, individually; JOHN and
7 VICTORIA BORTOLUSSI, individually; JOHN BATTEL, Trustee of the John J Battel Living
8 Trust; JOHN BROOMFIELD, Trustee of the John Nicholas Broomfield Trust; JOHN F.
9 JOHNSTON and KATHERINE M. JOHNSTON, individually as Trustees of the John Fraser
10 Johnston Family Trust; JOHN HAIGH; JOHN KERTIS; JOHN MUTLOW; JOHN PACE,
11 Trustee of the John Brice Pace Family Trust; JOHN RICHARDSON; JOHN VINEYARD; JOHN
12 WARNER and JENNIFER DUNN, individually; JOHN WILLINGHAM; JOHN WINSPEAR;
13 JOHN YOUNG; JONATHAN WONG and JAN KOMURA, individually; JOSE and IMELDA
14 HURTADO, individually; JOSE and LISA MENDEZ, individually; JOSE ARREOLA JR. and
15 PAOLA CARRENO, individually; JOSE OLVERA and ALMA VALENCIANO, individually;
16 JOSEPH and DRENDA PLEDGER, individually; JOSEPH LYNN and ELVIRA LILLY
17 BARTHELEMY, individually and Trustees of the Joseph Lynn Barthelemy and Evira Lilly
18 Barthelemy 2002 Family Trust; JOSEPH and KATHLEEN LASALLE, individually; JOSEPH
19 and MICHELLE HARWELL, individually; JOSEPH and NINA NEULIGHT, individually;
20 JOSEPH and SHIRLEY GHOLSON, individually; JOSEPH LAM; JOSEPH RANDALL, Trustee
21 of the Joseph Darden Randall Revocable Trust; JOSEPH RESEIGH; JOSEPH TOOKER;
22 JOSHUA and JENNIFER GOLDSTEIN, individually; JOSHUA MOREAU; JOYCE and
23 FRANK PATOTA, individually; JUAN and GLORIA ESTRADA, individually; JUAN and
24 MARIA MARTINEZ, individually; JUDITH REICHMAN and HAROLD BROWN,
25 individually; JULIANNE BLOOMER and PHILIP RABE, individually; JULIE CENTENO;
26 JULIO LUNA and DEBBIE LUN, individually; JUNE SEARS, Trustee of the June Katherine
27 Sears Living Trust; JUPETO PROPERTIES, LLC; KAC LLC; KAREN L. HANSON and
28 LAWRENCE S. HANSON, Trustees of the Hanson L.S. Revocable Living Trust; KAREN

1 PHIPPS, Trustee of the Phipps Family Trust; KARIN DRON, Trustee of the Boyd S. Dron and
2 Karin K. Dron Joint Living Trust; KARIN L. JAMES, Trustee of the James Family Trust; KARL
3 and BEVERLEY MALLETTE, individually; KATHARINE and JOHN BROESAMLE,
4 individually; KATHLEEN and ADAM MORRISON, individually; KATHLEEN and THOMAS
5 GERMAN, individually; KATHLEEN BACHELOR; KATHLEEN NOLAN, Trustee of the
6 Kathleen Ann Nolan Revocable 2006 Family Trust; KATHRYN BARTHOLOMEW, Trustee of
7 the Kathryn Oconnor Bartholomew Living Trust; KATHY ALDERMAN; KATZ PINCETL
8 ORCHARD, LLC; KAY DORNBUSCH, Trustee of the Dornbusch Family Living Trust; KEITH
9 and ANAHID JEWETT, individually; KEITH and ROBIN LAWSON, individually; KEITH and
10 VICTORIA NIGHTINGALE, individually; KELLEY and JOHN DYER IV, individually;
11 KELVIN DODD and DEBORAH GOMEZ, individually; KENETT NIESSEN; KENNETH and
12 ANNE BOYDSTON, individually; KENNETH and BRENDA WHITTEKER, individually;
13 KENNETH and CAROL FERGESON, individually; KENNETH and ELIZABETH GRUBER,
14 individually; KENNETH and LAURA BROWN, individually; KENNETH and MICHAEL
15 BALLARD, individually; KENNETH and SARAH VAN DYKE, individually; KENNETH
16 MORGAN; KENNETH VADNAIS; KERN COUNTY; KEVIN and ASLI RUF, individually;
17 KEVIN and JENNIFER WHITE, individually; KEVIN and JOANNE OLSLAND, individually;
18 KEVIN and JODI DUNN, individually; KHALED A. AL-AWAR and SHERYL L. AL-AWAR,
19 individually as Trustees of the K. and S. Al-Awar Family Trust; KIKI LYON, Trustee of the Kiki
20 Lyon Living Trust; KIM HANNA, Trustee of the Hanna Family Trust; KRISTAN ALTIMUS;
21 KURT and DAYNA ROGGENSTROH, individually; KURT and LUISA NEHER, individually;
22 KURT PATRICK ZIERHUT and STEPHANIE LEE ZIERHUT, Co-Trustees of the Living Trust
23 of Kurt Patrick Zierhut and Stephanie Lee Zierhut; LANSRING, LP; LARRY and JOYCE
24 HEATH, individually; LARRY DAVIS; LARRY HUBENTHAL, Trustee of the Larry Hubenthal
25 Living Trust; LARRY NEFF, Trustee of the Larry Neff Trust; LAS ENCINAS MOBILE HOME
26 PARK; LAURA B. PECK and ANDREW D. VILES, individually as Trustees of the William L.
27 and LAURA B. PECK Trust - Marital Trust; LAURA GREEN, Trustee of the Green Survivors
28 Trust; LAURIE JOHNSON, Trustee of the Laurie A. Johnson Living Trust; LAURIE SMITH;

1 LAWRENCE and SHARON MCMILLAN, individually; LAWRENCE I and PATRICIA A.
2 HARTMANN, individually as Trustees of the Larry and Pat Hartmann Family Trust; LEE and
3 JANET CASSEL, individually; LEE FITZGERALD, Trustee of the Lee I Fitzgerald 2007
4 Revocable Living Trust; LEE LEBECK; LEE ROSENBAUM, Trustee of the Chief Cornerstone
5 Trust; LEON and CAROLINE PAHLE, individually; LEONARD PETITT and KAY ROLFE,
6 individually; LESLEE and TERRY GUSTAFSON, individually; LESLIE MCCLEARY;
7 LESTER L. and LINDA L. BARBEE, individually as Trustees of the Lester L. Barbee and Linda
8 L. Barbee Joint Revocable Living Trust; LIANA HARP and NATHAN JONES, individually;
9 LILIAN RUVALCABA; LINDA CHAPMAN, Trustee Linda of the Jean Chapman Living Trust;
10 LINDA GRIFFIN; LINDA MCLAUGHLIN, Trustee of the Linda Landrieu McLaughlin Living
11 Trust; LINDA OLIVER, Trustee of the Linda A Oliver 2005 Revocable Living Trust; LIPKA
12 RICHARD, Trustee of the Lorraine Trust; LISA LOPEZ and BRIAN MERRILL, individually;
13 LISA SMITH and NATHANIEL COX, individually; LLOYD SMITH; LOGAN and MISTY
14 HAGEGE, individually; LOGAN and TIFFANY GOULD, individually; LOIS STONE
15 ERBURU, as Trustee of the Surviving Spouse's Trust Created in the Robert and Lois Erburu
16 Living Trust; LON and MARGARETA KIRKGAARD, individually; LONGHORN LANE, LLC;
17 LORENE CLEARY; LORI SCHLOREDT; LOU and BARTON MATTHEWS, individually;
18 LOUIS and IRENE GUTIERREZ, individually; LOUIS PRICE; LOUISE and GARY CULVER,
19 individually; LOUISE KONSTANZER, Trustee of the Ron and Louise Konstanzer Family Trust;
20 LOUISE TINDLE, SOLE Trustee of the "Bypass Trust" Created Under The Tindle Trust; LUIS
21 HERRERA and KIMBERLY OYAMA, individually; LUPE MILNER, Trustee of the Lupe
22 Milner Family Trust; LYDIA JIMENEZ; LYLE and CECILIA HALLBLOM, individually;
23 LYNDON HEBENSTREIT; LYNN COLEMAN; LYNN PIKE, Trustee of the Lynn 2016 Trust;
24 LYSIANE WALLIS; M. SNYDER; MALCOLM and BRENDA KNIGHT, individually;
25 MALCOLM and KELLEY MCDOWELL, individually; MANDY MACALUSO, Trustee of the
26 Living Trust of Mandy Macaluso; MANUEL ALMEIDA and KEVIN BAGLEY, individually;
27 MARCUS and AMY HUEPPE, individually; MARCUS and EVA KETTLES, individually;
28 MARGARET M. ALDRICH, Trustee of the Russell F. Aldrich and Margaret M. Aldrich

1 “Decedent’s Trust,” and Trustee of the Russell F. Aldrich and Margaret M. Aldrich Living Trust;
2 MARGO KELLY, Trustee of the Kelly Trust; MARIA BLASCO; MARIA COLLINS; MARIE
3 W. WALLACE, Trustee of the Marie Weismiller Wallace Separate Property Trust; MARIKA
4 ZOLL; MARILYN SWEENEY, Trustee of the Marilyn Sweeney Revocable Living Trust;
5 MARIO and SHAWN REYES, individually; MARION and BETTY EARNEST, individually;
6 MARK and COLLEEN RUSIN, individually; MARK and CONNIE CLINE, individually;
7 MARK and HELEN MOSKOVITZ, individually; MARK and MARCIA ALBERTSEN,
8 individually; MARK BELLINI; MARK W. ETCHART, Trustee of the Mark W. Etchart Separate
9 Property Trust, and Trustee of the Michel A. Etchart Separate Property Trust; MARSHA
10 MACDONALD; MARSHALL and DINA MURPHY, individually; MARTHA FAST, Trustee of
11 the Martha L Fast Living Trust; MARTHA LALIBERTE; MARTHA MORAN; MARTIN and
12 BARBARA POPS, individually; MARTIN and NATALIE EHRLICH, individually; MARTIN
13 and PATRICIA HENDERSON, individually; MARY and THOMAS SNOW, individually;
14 MARY DOWNER, Trustee of the Arthur and Mary Downer Family Trust; MARY L. VOMUND,
15 Trustee of the Mary L. Vomund 1987 Trust; MARY THOMAS, Trustee of the Thomas Survivors
16 Trust; MARY WINGATE, Trustee of the Mary Louise Wingate Trust; MATTAWA and ROND
17 LARUE CLEMENTS, individually; MATTHEW and JUDY FARMER, individually;
18 MATTHEW and KIMBERLY HULTGEN, individually; MAX REED; MAXIMIANO and
19 NORMA ORTIZ, individually; J. MCGLINCHEY; MCNELL CREEK RANCH, A GENERAL
20 PARTNERSHIP; MCNELL PROPERTIES, LLC; MELESIO RAMIREZ; MELISSA VAN
21 SICLEN; MERL and KIM MELSTRAND, individually; MICHAEL and ALLISON SEDLAK,
22 individually; MICHAEL and ANNELL LA BARGE, individually; MICHAEL and BARBARA
23 MCCARTHY, individually; MICHAEL and BERNARD CLARK, individually; MICHAEL and
24 CAROL JACKSON, individually; MICHAEL and DIANNA FARRAR, individually; MICHAEL
25 and HEIDI BRADBURY, individually; MICHAEL and KIMBERLY ROBERTSON,
26 individually; MICHAEL and NANCY KRUMPSCHMIDT, individually; MICHAEL and
27 SHARON WILLIAMS, individually; MICHAEL and SONJA BARRETT, individually;
28 MICHAEL and TERRI IMWALLE, individually; MICHAEL CHAMBLISS; MICHAEL

1 HOOVER, Trustee of the Michael Hoover Living Trust; MICHAEL KELLEY; MICHAEL L.
2 DELAMORE and DEBORAH FINLEY-DELAMORE, individually as Trustees of the Delamore
3 Finley Family Trust; MICHAEL LOMBARDO, Trustee of the Michael Lombardo Living Trust;
4 MICHAEL MARIETTA, individually and as Trustee of the Marietta Separate Property Trust;
5 MICHAEL PRENTICE; MICHAEL PURDY, Trustee of the Purdy Family Revocable Trust;
6 MICHAEL SALEH, Trustee of the Saleh and Lea Saleh 1984 Family Trust; MICHAEL T.
7 MARSHALL and LISA SKYHEART MARSHALL, individually as Trustees of the Marshall
8 Living Trust; MICKY FROELICH; MIGUEL and ELVIA RAMIREZ, individually; MIGUEL
9 ESTRADA; MURELLE STEVENS, Trustee of the Stevens Family Trust; NANCY FERRELL,
10 Trustee of the Nancy A. Ferrell Family Trust; NANCY GRAHAM; NANCY JACKSON, Trustee
11 of the Nancy J. Jackson Living Trust; NATALIA MOORE, Trustee of the Moore Family Trust;
12 NATHAN ALLEN; NATHANIEL and SUZETTE O'GRADY, individually; NATHANIEL
13 TRAUDT and KAREN TRAUDT, individually and as Trustees of the Traudt Family Trust; NEIL
14 and PATRICIA FRIEDRICHSEN, individually; NEIL KREITMAN, Trustee of the Neil
15 Kreitman Living Trust; NICK and MORNA TAMINICH, individually; NICK DAILY; NINA
16 MENCONI; NYE RANCH, LLC; OAK HAVEN, LLC; OAK VIEW SANITARY DISTRICT;
17 KRISHNAMURTI FOUNDATION OF AMERICA; OILFIELD SERVICE and TRUCK CO.;
18 OILFIELD SERVICE and TRUCK, INC.; OJAI ASSEMBLY OF GOD, INC., DBA OJAI'S
19 CHURCH OF THE LIVING CHRIST, INC.; OJAI HOME, LLC; OJAI UNIFIED SCHOOL
20 DISTRICT; OJAI VALLEY ATHLETIC CLUB; OJAI VALLEY LAND CONSERVANCY;
21 OJAI-JACKMAN, LLC; OLE BEHRENDTSEN; OLGA and TRENT JONES, individually;
22 ORIN JR. and KAREN CHAPPELL, individually; ORVILLE HERNVALL, Trustee of Hervnall
23 Orville and Marion Orville Trust; OSCAR and MARY KAAS, individually; OSCAR ACOSTA,
24 Trustee of the Acosta Trust; OST TRUCKS and CRANES; OVIS, LLC; PAMELA GRAU,
25 Trustee of the Pamela Grau Living Trust; PAMELA MELONE, Trustee of the Pamela M. Melone
26 Living Trust; PATRICIA BOAN and ALINA HOFFMAN, individually; PATRICIA BOAN and
27 JOHN HOFFMAN, individually; PATRICIA MARSHALL, Trustee of the Patricia Ann Marshall
28 Trust; PATRICIA MCPHERSON; PATRICIA MCGANN; PATRICIA UNRUHE and

1 ANDREW JARVIS, individually; PATRICK HENDERSON and JESSICA MAHARRY,
2 Trustees of the Maharry Henderson Family Trust; PATRICK TUMAMAIT; PAUL and ALDINE
3 HENNIGAN, individually; PAUL and JANET BAILEY, individually; PAUL and JUNE CLEM,
4 individually; PAUL and KIM ROBIE, individually; PAUL and MAELYN EBERT, individually;
5 PAUL and SALLY CENTENO, individually; PAUL FONTEYN, individually; PAUL
6 HOLAHAN and JULIE GRIST, individually; PAUL LEPIANE and BO BENGTSON,
7 individually; PAULA BROWN, Trustee of the Paula Jean Brown Trust; PAULA LASITER;
8 PAULA MCCULLOUGH, Trustee of the Paula J. McCullough Living Trust; PAULINE
9 MERCADO, Trustee of the Pauline Mercado Revocable Trust; PEDRO CISNEROS; PEDRO
10 TEPESANO; PER and INGE CHRISTIANSEN, individually; PERRY FAMILY, LLC; PETER
11 and LINDA DAPRIX, individually; PETER and NORMA DWORKIS, individually; PETER
12 DUFAU; PETER PASSELL; PETER STRAUSS and RACHEL TICOTIN, individually;
13 PETROCHEM DEVELOPMENT I, LLC; PHILIP and DARYLYN LONG, individually; PHILIP
14 and MARY PIERPONT, individually; PHILIP and ROBERT PIERPONT, individually;
15 PHILIPPE and BETSY CALAND, Trustees of the Philippe M. and Betsy C. Trust;
16 PREPARATORY VILLANOVA; QUINT MORRIS; RACHEL KONDOR and BRIAN SEGEE,
17 individually; RAFAEL and MAGDALENA VILLALPANDO, individually; RAFFI J.
18 MESROBIAN and MYRNA R. MESROBIAN, individually as Trustees of the Mesrobian Family
19 Trust; RAINER BUSCHMANN and JOHN JOHNSTON, individually; RALPH and LYNNE
20 LUNDY, individually; RAMAA MOSLEY; RANDAL R. O'CONNOR, SUCCESSOR Trustee of
21 the Red Clay Trust, and successor Trustee of the Le Cedre Trust; RANJIT SEVAPRAKASAM;
22 RAY HALL, Trustee-in-Trust of the 30 Acre Trust; RAYMOND and ESTHER KARDLY,
23 individually; RAYMOND and EVA LYONS, individually; RAYMOND MAGEE and LINDA
24 TAYLOR, individually; RDK LAND, LLC; REBECCA ADAMS; RED MOUNTAIN LAND
25 and FARMING, LLC; REEVES ORCHARD, LLC; REFUGIO GOMEZ; REX and HEIDI
26 LANNING, individually; REYNOLDS FLEMING; RICARDO GONZALEZ; RICHARD and
27 BILLIE SUMNER, individually; RICHARD and EMILY CARGILL, individually; RICHARD
28 and KATHERINE GODFREY, individually; RICHARD and LEE HARPER, individually;

1 RICHARD and MARILYN KALLAS;, individually RICHARD and NANCY FRANCIS,
2 individually; RICHARD and TERESA TURNER, individually; RICHARD DODSON, Trustee of
3 the Richard E. Dodson 2010 Revocable Trust; RICHARD FRANCIS; RICHARD FREY and
4 WENDY APPLEBY, individually; RICHARD and EMMA KLINE, individually; RICHARD
5 LOWEN; RICHARD MAGANA; RICHARD MCGRATH, Trustee of the Richard K McGrath
6 Living Trust; RICHARD SOJKA; RJPR LTD. PARTNERSHIP; ROBERT and ANAMARIA
7 SCHMID, individually; ROBERT and ANTOINETTE TIVY, individually; ROBERT and
8 DIANA PETROPULOS, individually; ROBERT and DIANNE STONE, individually; ROBERT
9 and DOMINQUE DANIELS, individually; ROBERT and DORA BALITZER, individually;
10 ROBERT and EMILY MARTIN, individually; ROBERT and GAEA CANNADAY,
11 individually; ROBERT and GERALDINE HUNSAKER, individually; ROBERT and
12 JACQUELINE MCDANIEL, individually; ROBERT and JANICE HASTIE, individually;
13 ROBERT and MARILYN SALAS, individually; ROBERT and MAUREEN YOUNG,
14 individually; ROBERT and SHEILA GHEN, individually; ROBERT and SONIA RODARTE,
15 individually; ROBERT and TAUNDRA RODDICK, individually; ROBERT and ANNA J.
16 AURIC, individually as Trustees of the Auric Anna J. Family Trust; ROBERT CALDER DAVIS,
17 JR., Trustee of the Robert Davis Surviving Spouse's Trust, Trustee of the Davis Family Bypass
18 Trust and Trustee of the Davis Family Trust; ROBERT DEKKERS; ROBERT ERICKSON and
19 RONALD WILSON, individually; ROBERT GRASMERE; ROBERT POLIDORI and
20 BRITTANY SANDERS, individually; ROBERTO and MARIA ALONSO, individually;
21 ROCKY MANN; RODERICK and JOYCE GREENE, individually; ROGER and SUSAN
22 DICKENS, individually; ROGER BURKE; ROGER HALEY; Trustee of the Roger and Christina
23 Haley Survivors Trust; ROGER WALKER; ROGERS-COOPER MEMORIAL FOUNDATION;
24 RONALD and BETTE BLUHM, individually; RONALD and JULIA BRUNS, individually;
25 RONALD BLOOD and LINDA JORDAN, individually; RONALD E. NOVAK and LINDA L.
26 LEWIS, individually as Trustees of the Novak Family Trust; RONALD K. FREELAND and
27 DOREEN FREELAND, individually as Trustees or their successors in interest of the Freeland
28 Trust and any amendment; RONALD L.R. HILL and DEBI R. HILL, Trustees of the R&D Hill

1 Family Trust; RONALD VOGT; ROSEMARIE SINGER; ROSEMARY PAYNE, Trustee of the
2 Rosemary Payne Trust; ROSS ANDERSON; ROWLAND A. HILL II and BRENDA M. HILL,
3 individually as Trustees of the Trust dated November 1, 2002; ROY HICKS, Trustee of the Roy
4 and Jacquelyn Hicks Family Trust; RUBEN and MARISA MARTINEZ, individually; RUBEN
5 CHAVEZ; RUBEN MAGANA and JANETTE LUPERCIO, individually; RUDY BAEZ;
6 RUSSEL and LAURA ALFORD, individually; RUSSELL and GOLDEN WILEY, individually;
7 RUSSELL WALDROP, Trustee of the Russell B. Waldrop Living Trust; RYAN and LAUREN
8 NICHOLS, individually; SABINO and NICKI PEREZ, individually; SABRINA VENSUS,
9 Trustee of the Sabrina Venskus Living Trust; SALLY CRAIN; SALVATORE SCARPATO;
10 SAMUEL and JOANNA SCHINDEL, individually; SAMUEL EATON; SANTA ANA RANCH,
11 INC.; SARAH YOUNG; SAUNIE KREWSON; SCOTT and BRITTANY DENTON,
12 individually; SCOTT and CAROL RASMUSSEN, individually; SCOTT and KEELA ALLISON,
13 individually; SCOTT and MARIA HERTZOG, individually; SCOTT and MICHELE SUPAN;
14 SCOTT CHASSE, Trustee of the Scott Chasse Revocable Living Trust; SCOTT FORSYTH and
15 JOY FEDELE, individually; SCOTT LUNDY, Trustee of the Scott Lundy Trust; SCOTT
16 LUTTENBERGER and NATASHA WILCOX, individually; SCOTTIE MONICAL; SEAN and
17 LESLIE BENNETT, individually; SERAFIN and MARTHA FLORES, individually; SEVAN
18 GERARD; SHAHRAM SHAHROKHFAR and DINA NAVA, individually; SHANKS
19 INVESTMENT GROUP, LLC; SHAWN FULBRIGHT, Trustee of the Shawn Fulbright 2014
20 Revocable Trust; SHAWN REED; SHELL OIL CO.; SHERRICE and JOHN WEECES,
21 individually; SHERRIE DAILY; SHERYL SHUSHAN; SHIPPEE, LLC; SHULL BONSALL,
22 JR., Trustee of the SHULL BONSALL FAMILY Trust; EVANGELINE BONSALL SMITH, a
23 married woman; SIDNEY and JAYNE RICE, individually; STEVEN P. SMITH and LYNN
24 DAVIS-SMITH, individually as Trustees of the Smith Revocable Living Trust; SOUTHERN
25 CALIFORNIA EDISON CO.; SOUTHERN CALIFORNIA ASSOCIATED INVESTORS, LTD.;
26 SPENCER and BAILEY HILL, individually; SRPS, LP; STACY CADENASSO; STANLEY and
27 THERESA WYATT, individually; STANLEY and W HUBBELL, individually; STATE OF
28 CALIFORNIA, DEPARTMENT OF TRANSPORTATION; STEFAN KOZAK and ANA

1 LOPES, individually; STEPHANIE and CHERYL BEAS, individually; STEPHEN MATZKIN,
2 Trustee of the Stephen Matzkin Trust; STEPHEN TURNER, Trustee of the Stephen R. Turner
3 Living Trust; STEVEN and BRENT KANALY, individually; STEVEN and CHRISTINE
4 VAUGHAN, individually; STEVEN and KA RAPHOLZ, individually; STEVEN and KAREN
5 ERICKSON, individually; STEVEN and KRISSELL DUTTER, individually; STEVEN ELLIOT
6 EDELSON, Trustee of the Los Angeles Entertainment Trust; SUMEET BHATIA and MICHAEL
7 MCDONALD, individually; SUMPURAN KHALSA, Trustee of the Sumpuran S. Khalsa Living
8 Trust; SURIA and JOHN GOTTESMAN, individually; SUSAN BEE, Trustee of the John and
9 Susan Bee Family Trust; SUSAN CONLEY, Trustee of the William and Susan Conley Family
10 Trust; SUSAN DILLER, Trustee of the Susan J Diller Trust; SUSAN GARAND; SUSAN
11 GRUBER, individually and as Trustee of the Susan Gruber Living Trust; SUSAN MCCORD-
12 NEUFELD; SUSAN MOLL; SUSAN WEBSTER; SUZANNE HARVEY, individually and as
13 Trustee of the Suzanne G. Harvey Revocable Trust; T BONE HOLDINGS, LLC; TANYA
14 SMITH and MICHAEL MONTANO, individually; TANYA STARCEVICH; TED ROBINSON,
15 Trustee of the Robinson Family Trust; TELOS DEVELOPMENT OJAI, LLC; TERRY
16 WILSON, Trustee of the Terry Coultas Wilson Living Trust; THE OJAI RENTAL, LLC; THE
17 ROMAN CATHOLIC ARCHBISHOP OF LOS ANGELES, a sole corporation; THEODOR and
18 LORE EXNER, individually; THERESA STARK; THOMAS and CYNTHIA CARVER,
19 individually; THOMAS and NANETTE BENBROOK, individually; THOMAS and JADONA
20 COLLER HARPER, individually; THOMAS JACKSON; THOMAS TAMPLIN and
21 MICHELLE WELLS, individually; THOMAS WALBRIDGE, Trustee of the Thomas C
22 Walbridge Trust; THREE OAKS, LLC; THREE SISTERS ORCHARD, LP; TIMOTHY and
23 CHERYL AUSTIN, individually; TIMOTHY and KATHLEEN MCHUGH, individually;
24 TIMOTHY and KATHRYN MORAN, individually; TIMOTHY and LINDA TURNER,
25 individually; TIMOTHY and MARY WILLIAMSON, individually; TIMOTHY JONES; TODD
26 and CHRISTINA MCGINLEY, individually; TODD RYAN and JESSICA CLICK, individually;
27 TODD TULLETT, Trustee of the Todd Tullett Revocable Living Trust; TOM and NANCY
28 ROLAND, individually; TONY and HEATHER CARLOS, individually; TRACEY and

1 MELANIE BOULTON, individually; TRENT and KRIS GRECO, individually; TYLER and
2 MARIA BARRELL, individually; TYLER LABINE and CARRIE RUSCHEINSKY,
3 individually; ULDINE and FABIEN CASTEL, individually; URIEL and CHIEKO LOPEZ,
4 individually; US NATURAL RESOURCES, INC.; VALLEY OAK CHARTER; VANLAW
5 INVESTMENT CORP.; VENTURA LAND Trust; VENTURA UNIFIED SCHOOL DISTRICT;
6 VICENTE GUZMAN; VICKI DAW; VICKI L. HOLLINGSWORTH, Trustee of the
7 Hollingsworth Trust; VIRGINIA M. MCCARTHY, Trustee of the Virginia M. McCarthy Living
8 Trust; VIRGINIA SIEGFRIED, Trustee of the Virginia A. Siegfried Revocable Trust; VIVIAN
9 ARBER; VIVIENNE MOODY; WALTER and EVELYN GOLIS, individually; WALTER and
10 LINDA BOYSIEWICK, individually; WALTER MCGOWAN, individually and as Trustee of the
11 Walter Robert McGowan 1995 Trust; WANDA and MENIFORD CANTERBERRY,
12 individually; WATERMARK CARP II LLC; WAYNE TATE and JANICE PRIEBE-TATE,
13 individually as Trustees of the Tate Trust, as community property; WEISS INVESTMENT
14 PROPERTIES; WENDY and DAVID CHURCHILL, individually; WERNER and ELVA
15 FISCHER, individually; WESLEY SCOTT and KASEY PERINS, individually; WEST CRAG
16 GLEN SMITH, successor Trustee of the Melissa Irene Elizabeth Smith Irrevocable Special Needs
17 Trust - 1993; WILLI and STEFANIE U. COELER, individually and as Trustees of the W. and S.
18 Coeler Living Trust; WILLIAM and CYNTHIA ANDERSON, individually; WILLIAM and
19 JACQUELINE BOCH, individually; WILLIAM and LORRAINE WALSH, individually;
20 WILLIAM and MELINDA WELCH, individually; WILLIAM and SUSAN LUTHER,
21 individually; WILLIAM B. HART, JR., Trustee of the Constance Eaton Personal Residence
22 Trust; WILLIAM BAILEY, Trustee of the William F. Bailey Living Trust; WILLIAM
23 BROTHERS, Trustee of the William C. Brothers Living Trust; WILLIAM ERICKSON;
24 WILLIAM F. NEWTON and CHARLOTTE R. NEWTON, individually as Trustees of the
25 NEWTON FAMILY Trust; WILLIAM GILBRETH, Trustee of the William J. Gilbreth Trust;
26 WILLIAM HAWKSWORTH; WILLIAM LOWES; WILLIAM L. REYNOLDS; WILLIAM
27 WHITE, Trustee of the William C. White Trust; WILLIAM WHORF; WILMETTA DAVIS;
28 WINFRIED and CAROL BOERSCH, individually; WYNN JOHNSON and LISA AYALA

1 JOHNSON, individually; YAN and ALILI COMMENT, individually; YARROW and
2 CAROLINE CHENEY, individually; YITZHAK and SMADAR ORLANS, individually; YVON
3 and MALINDA CHOUINARD, individually; ZOBIDA OLSON [collectively “Riparian and
4 Overlying Landowners”];
5
6 and ROES 1-1,000,
7 collectively, Cross-Defendants.
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THIRD AMENDED CROSS-COMPLAINT

Cross-Complainant City of San Buenaventura (“City”) alleges as follows:

INTRODUCTION

1. This Cross-Complaint seeks a judicial determination of rights to all water within the Ventura River Watershed (“Watershed”), including a comprehensive adjudication of the waters of the Ventura River and the groundwater basins located within the Watershed and their interconnected surface waters and for the imposition of a physical solution. An adjudication is necessary to protect and conserve the limited water supply that is vital to the public health, safety, and welfare of all persons and entities that depend upon waters from the Watershed and to ensure the reasonable use, pursuant to Article X, section 2 of the California Constitution, of the waters in the Watershed. For these reasons, City files this Cross-Complaint to promote the general public welfare in the Watershed; protect City’s rights to pump and divert water and provide water to the public; protect from a loss of the public’s water supply; prevent degradation of the quality of the public water supply; and avoid higher water costs to the public.

PARTIES

2. City is a charter city and municipal corporation of the State of California and located in the County of Ventura (“Ventura County”). The City operates wells and diversions which extract surface and/or subsurface water from the Ventura River and receives water deliveries from Lake Casitas.

Original Cross-Defendants

3. Cross-Defendant Duncan Abbott (“Abbott”) is an individual. City is informed and believes that Abbott operates wells and/or diversions which extract surface and/or subsurface water from Coyote Creek.

1 4. Cross-Defendant AGR Breeding, Inc. (“AGR”) is a California corporation
2 organized and existing under the laws of the State of Colorado and doing business in Ventura
3 County. City is informed and believes that AGR operates wells and/or diversions which extract
4 surface and/or subsurface water from San Antonio Creek.

5 5. Cross-Defendant Asquith Family Limited Partnership, Ltd. (“Asquith Family”) is
6 a California Corporation organized and existing under the laws of the State of California and
7 doing business in Ventura County. City is informed and believes that Asquith Family operates
8 well(s) which extract water from the Ojai Valley Groundwater Basin.

9 6. Cross-Defendant Troy Becker (“Becker”) is an individual. City is informed and
10 believes that Becker operates well(s) which extract water from the Ojai Valley Groundwater
11 Basin.

12 7. Cross-Defendant Bentley Family Limited Partnership (“Bentley”) is a California
13 corporation registered in Delaware and does business in Ventura County. City is informed and
14 believes that Bentley operates well(s) which extract water from the Ojai Valley Groundwater
15 Basin.

16 8. Cross-Defendant Robin Bernhof (“Bernhof”) is an individual. City is informed
17 and believes that Bernhof operates well(s) which extract water from the Ojai Valley
18 Groundwater Basin.

19 9. Cross-Defendant Dwayne Boccali (“Boccali”) is an individual. City is informed
20 and believes that Bernhof operates well(s) which extract water from the Ojai Valley
21 Groundwater Basin.

22 10. Cross-Defendant Janet Boulton (“J. Boulton”) is an individual. City is informed
23 and believes that J. Boulton operates well(s) which extract water from the Ojai Valley
24 Groundwater Basin.

25 11. Cross-Defendant Michael Boulton (“M. Boulton”) is an individual. City is
26 informed and believes that M. Boulton operates well(s) which extract water from the Ojai Valley
27 Groundwater Basin.

12. Cross-Defendant Dwayne Bower (“Bower”) is an individual. City is informed and believes that Bower operates well(s) which extract water from the Ojai Valley Groundwater Basin.

13. Cross-Defendant Burgess Ranch (“Burgess”) is a California corporation organized and existing under the laws of the State of Colorado and doing business in Ventura County. City is informed and believes that Burgess operates well(s) which extract water from the Ojai Valley Groundwater Basin.

14. Cross-Defendant Michael Caldwell (“Caldwell”) is an individual. City is informed and believes that Caldwell operates wells and/or diversions which extract surface and/or subsurface water from the Upper Ventura River.

15. Cross-Defendant Casitas Municipal Water District (“Casitas”) is a California special district organized and existing under the laws of the State of California and located in Ventura County. City is informed and believes that Casitas obtains water from Lake Casitas which contains natural flows from Coyote and Santa Ana Creeks and Ventura River diversions transported to the lake via the 5.4-mile Robles Canal from the Robles Diversion and Fish Passage Facility. City is informed and believes that in 2017, Casitas acquired Golden State Water Company (“Golden State”), a California corporation previously organized and existing under the laws of the State of California and doing business in Ventura County. Golden State was a public utility regulated by the California Public Utilities Commission. City is informed and believes that Golden State operated and that Casitas now operates wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows from the Ojai Valley Groundwater Basin to a tributary of the Ventura River.

16. Cross-Defendant Casitas Mutual Water Company (“CMWC”) is a California corporation organized and existing under the laws of the State of California and doing business as a mutual water company in Ventura County. City is informed and believes that CMWC operates wells that extract water from the Upper Ventura River Groundwater Basin, affecting outflows from that basin to Watershed.

1 17. Cross-Defendant Charles Cho (“Cho”) is an individual. City is informed and
2 believes that Cho operates well(s) which extract water from the Ojai Valley Groundwater Basin.

3 18. Cross-Defendant Joe Clark (“J. Clark”) is an individual. City is informed and
4 believes that J. Clark operates well(s) which extract water from the Ojai Valley Groundwater
5 Basin.

6 19. Cross-Defendant Kevin Clark (“K. Clark”) is an individual. City is informed and
7 believes that K. Clark operates well(s) which extract water from the Ojai Valley Groundwater
8 Basin.

9 20. Cross-Defendant Lisa Clark (“L. Clark”) is an individual. City is informed and
10 believes that L. Clark operates well(s) which extract water from the Ojai Valley Groundwater
11 Basin.

12 21. Cross-Defendant Rebecca Collins (“R. Collins”) is an individual. City is informed
13 and believes that R. Collins operates well(s) which extract water from the Ojai Valley
14 Groundwater Basin.

15 22. Cross-Defendant Thomas Collins (“T. Collins”) is an individual. City is informed
16 and believes that T. Collins operates well(s) which extract water from the Ojai Valley
17 Groundwater Basin.

18 23. Cross-Defendant Michael Cromer (“Cromer”) is an individual. City is informed
19 and believes that Cromer operates wells and/or diversions which extract surface and/or subsurface
20 water from San Antonio Creek.

21 24. Cross-Defendant Robert C. Davis, Jr. (“Davis”) is an individual. City is informed
22 and believes that Davis operates well(s) which extract water from the Ojai Valley Groundwater
23 Basin.

24 25. Cross-Defendant Linda Epstein (“Epstein”) is an individual. City is informed and
25 believes that Epstein operates well(s) which extract water from the Ojai Valley Groundwater
26 Basin.

27 26. Cross-Defendant Essick Farm Management Company, LLC (“Essick”) is a
28 California corporation organized and existing under the laws of the State of California and doing

1 business in Ventura County. City is informed and believes that Essick operates well(s) which
2 extract water from the Ojai Valley Groundwater Basin.

3 27. Cross-Defendant Etchart Ranch (“Etchart”) is located in Ventura County. City is
4 informed and believes that Etchart operates wells and/or diversions which extract surface and/or
5 subsurface water from the Upper Ventura River.

6 28. Cross-Defendant James Finch (“Finch”) is an individual. City is informed and
7 believes that Finch operates wells and/or diversions which extract surface and/or subsurface water
8 from the Lower Ventura River.

9 29. Cross-Defendant Flying H Ranch, Inc. (“Flying”) is a California corporation
10 organized and existing under the laws of the State of California and doing business in Ventura
11 County. City is informed and believes that Flying operates wells and/or diversions which extract
12 surface and/or subsurface water from San Antonio Creek.

13 30. Cross-Defendant Ernest Ford (“Ford”) is an individual. City is informed and
14 believes that Ford operates wells and/or diversions which extract surface and/or subsurface water
15 from the Upper Ventura River.

16 31. Cross-Defendant Wayne Francis (“Francis”) is an individual. City is informed and
17 believes that Francis operates well(s) which extract water from the Ojai Valley Groundwater
18 Basin.

19 32. Cross-Defendant Friend’s Ranches, Inc. (“Friend’s”) is a California corporation
20 organized and existing under the laws of the State of California and doing business in Ventura
21 County. City is informed and believes that Friend’s operates wells and/or diversions which
22 extract surface and/or subsurface water from San Antonio Creek and the Upper Ventura River.

23 33. Cross-Defendant John Galaska (“Galaska”) is an individual. City is informed and
24 believes that Galaska operates well(s) which extract water from the Ojai Valley Groundwater
25 Basin.

26 34. Cross-Defendant Richard Gilleland (“Gilleland”) is an individual. City is
27 informed and believes that Gilleland operates wells and/or diversions which extract surface
28 and/or subsurface water from San Antonio Creek.

1 35. Cross-Defendant Jurgen Gramckow (“Gramckow”) is an individual. City is
2 informed and believes that Gramckow operates wells and/or diversions which extract surface
3 and/or subsurface water from Coyote Creek.

4 36. Cross-Defendant Gridley Road Water Group (“Gridley”) is a California
5 corporation organized and existing under the laws of the State of California and doing business as
6 a mutual water company in Ventura County. City is informed and believes that Gridley operates
7 wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows from that
8 basin to Watershed.

9 37. Cross-Defendant Stephanie Gustafson (“Gustafson”) is an individual. City is
10 informed and believes that Gustafson operates well(s) which extract water from the Ojai Valley
11 Groundwater Basin.

12 38. Cross-Defendant Lawrence Hartmann (“Hartmann”) is an individual. City is
13 informed and believes that Hartmann operates well(s) which extract water from the Ojai Valley
14 Groundwater Basin.

15 39. Cross-Defendant Hermitage Mutual Water Company (“Hermitage”) is a California
16 corporation organized and existing under the laws of the State of California and doing business as
17 a mutual water company in Ventura County. City is informed and believes that Hermitage
18 operates wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows
19 from that basin to Watershed.

20 40. Cross-Defendant Dorothy Holmes (“Holmes”) is an individual. City is informed
21 and believes that Holmes operates wells and/or diversions which extract surface and/or
22 subsurface water from North Fork Matilija Creek.

23 41. Cross-Defendant Stephen Huyler (“Huyler”) is an individual. City is informed and
24 believes that Huyler operates well(s) which extract water from the Ojai Valley Groundwater
25 Basin.

26 42. Cross-Defendants Jurgen Gramckow and Geraldine Gramckow are Trustees of the
27 J&G Trust (“Gramckows”). City is informed and believes that Gramckows operate wells and/or
28 diversions which extract surface and/or subsurface water from the Upper Ventura River

1 Groundwater Basin. City is informed and believes that Gramckows are owners of or are
2 beneficial interest holders in real property located within the Ventura River Watershed, and they
3 claim riparian rights to divert and/or extract surface and/or subsurface water from the Ventura
4 River and/or its tributaries, whether or not they have exercised such riparian rights.

5 43. Cross-Defendant Cheryl Jensen (“Jensen”) is an individual. City is informed and
6 believes that Jensen operates well(s) which extract water from the Ojai Valley Groundwater
7 Basin.

8 44. Cross-Defendant Brett Kantrowitz (“B. Kantrowitz”) is an individual. City is
9 informed and believes that B. Kantrowitz operates well(s) which extract water from the Ojai
10 Valley Groundwater Basin.

11 45. Cross-Defendant Denise Kantrowitz (“D. Kantrowitz”) is an individual. City is
12 informed and believes that D. Kantrowitz operates well(s) which extract water from the Ojai
13 Valley Groundwater Basin.

14 46. Cross-Defendant Jerry Kenton (“Kenton”) is an individual. City is informed and
15 believes that Kenton operates wells and/or diversions which extract surface and/or subsurface
16 water from North Fork Matilija Creek.

17 47. Cross-Defendant Ole Konig (“Konig”) is an individual. City is informed and
18 believes that Konig operates wells and/or diversions which extract surface and/or subsurface
19 water from San Antonio Creek.

20 48. Cross-Defendant Krotona Institute of Theosophy (“Krotona”) is a 501(c)(3)
21 California non-profit corporation located in Ventura County. City is informed and believes that
22 Krotona claims water rights to surface water and/or groundwater in the Ventura River Watershed.

23 49. Cross-Defendant Tim Krout (“Krout”) is an individual. City is informed and
24 believes that Krout operates well(s) which extract water from the Ojai Valley Groundwater Basin.

25 50. Cross-Defendant Betina La Plante (“La Plante”) is an individual. City is informed
26 and believes that La Plante operates well(s) which extract water from the Ojai Valley
27 Groundwater Basin.

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1 51. Cross-Defendant Lutheran Church of the Holy Cross of Ojai (“Lutheran Church”)
2 is a California Non-profit Corporation. City is informed and believes that Lutheran Church
3 operates wells and/or diversions which extract surface and/or subsurface water from San Antonio
4 Creek.

5 52. Cross-Defendant Scott Luttenberg (“Luttenberg”) is an individual. City is
6 informed and believes that Luttenberg operates well(s) which extract water from the Ojai Valley
7 Groundwater Basin.

8 53. Cross-Defendant Jeffrey Luttrull (“Luttrull”) is an individual. City is informed
9 and believes that Luttrull operates well(s) which extract water from the Ojai Valley Groundwater
10 Basin.

11 54. Cross-Defendant Meiners Oaks Water District (“Meiners Oaks”) is a California
12 special district organized and existing under the laws of the State of California and located in
13 Ventura County. City is informed and believes that Meiners Oaks operates wells that extract
14 surface and/or subsurface water from the Ventura River and/or Watershed.

15 55. Cross-Defendant Fredrick Menninger (“F. Menninger”) is an individual. City is
16 informed and believes that F. Menninger operates well(s) which extract water from the Ojai
17 Valley Groundwater Basin.

18 56. Cross-Defendant Margaret Menninger (“M. Menninger”) is an individual. City is
19 informed and believes that M. Menninger operates well(s) which extract water from the Ojai
20 Valley Groundwater Basin.

21 57. Cross-Defendant Stephen Mitchell (“Mitchell”) is an individual. City is informed
22 and believes that Mitchell operates well(s) which extract water from the Ojai Valley Groundwater
23 Basin.

24 58. Cross-Defendant Bill Moses (“Moses”) is an individual. City is informed and
25 believes that Moses operates well(s) which extract water from the Ojai Valley Groundwater
26 Basin.

27 59. Cross-Defendant North Fork Springs Mutual Water Company (“North Fork
28 Springs”) is a California corporation organized and existing under the laws of the State of

1 California and doing business as a mutual water company in Ventura County. City is informed
2 and believes that North Fork Springs operates wells that extract water from the Upper Ventura
3 River Groundwater Basin, affecting outflows from that basin to Watershed.

4 60. Cross-Defendant Ojai Water Conservation District (“Ojai WCD”) is a California
5 special district organized and existing under the laws of the State of California and located in
6 Ventura County. City is informed and believes that Ojai WCD operates wells and/or diversions
7 which extract surface and/or subsurface water from San Antonio Creek.

8 61. Cross-Defendant Old Creek Road Mutual Water Company (“Old Creek Road”) is
9 a California corporation organized and existing under the laws of the State of California and
10 doing business as a mutual water company in Ventura County. City is informed and believes that
11 Old Creek Road obtains water from Casitas, which obtains water from Lake Casitas which
12 contains water diverted from the Ventura River.

13 62. Cross-Defendant Rancho de Cielo Mutual Water Company (“Rancho de Cielo”) is
14 a California corporation organized and existing under the laws of the State of California and
15 doing business as a mutual water company in Ventura County. City is informed and believes that
16 Rancho de Cielo obtains water from Casitas, which obtains water from Lake Casitas which
17 contains water diverted from the Ventura River.

18 63. Cross-Defendant Rancho Matilija Mutual Water Company (“Rancho Matilija”) is
19 a California corporation organized and existing under the laws of the State of California and
20 doing business as a mutual water company in Ventura County. City is informed and believes that
21 Rancho Matilija operates wells that extract surface and/or subsurface water from the Ventura
22 River and/or Watershed.

23 64. Cross-Defendant Shlomo Raz is an individual. City is informed and believes that
24 Shlomo Raz operates well(s) which extract water from the Ojai Valley Groundwater Basin.

25 65. Cross-Defendant Sylvia Raz is an individual. City is informed and believes that
26 Sylvia Raz operates well(s) which extract water from the Ojai Valley Groundwater Basin.

27 66. Cross-Defendant Rincon Water and Road Works (“Rincon”) is a California
28 corporation organized and existing under the laws of the State of California and doing business in

1 Ventura County. City is informed and believes that Rincon claims water rights to surface water
2 and/or groundwater in the Ventura River Watershed.

3 67. Cross-Defendant Charles Rudd (“Rudd”) is an individual. City is informed and
4 believes that Rudd operates wells and/or diversions which extract surface and/or subsurface water
5 from San Antonio Creek.

6 68. Cross-Defendant William Rusin (“Rusin”) is an individual. City is informed and
7 believes that Rusin operates wells and/or diversions which extract surface and/or subsurface
8 water from San Antonio Creek.

9 69. Defendant Mark Saleh (“Saleh”) is an individual. City is informed and believes
10 that Saleh operates well(s) which extract water from the Ojai Valley Groundwater Basin.

11 70. Cross-Defendant Senior Canyon Mutual Water Company (“Senior Canyon”) is a
12 California corporation organized and existing under the laws of the State of California and doing
13 business as a mutual water company in Ventura County. City is informed and believes that
14 Senior Canyon operates wells that extract water from the Ojai Valley Groundwater Basin,
15 affecting outflows from the Ojai Valley Groundwater Basin to a tributary of the Ventura River.

16 71. Cross-Defendant Siete Robles Mutual Water Company (“Siete Robles”) is a
17 California corporation organized and existing under the laws of the State of California and doing
18 business as a mutual water company in Ventura County. City is informed and believes that Siete
19 Robles operates wells that extract water from the Ojai Valley Groundwater Basin, affecting
20 outflows from that basin to Watershed.

21 72. Cross-Defendant Sisar Mutual Water Company (“Sisar”) is a California
22 corporation organized and existing under the laws of the State of California and doing business as
23 a mutual water company in Ventura County. City is informed and believes that Sisar operates
24 wells that extract water from the Upper Ojai Valley Groundwater Basin, affecting outflows from
25 that basin to Watershed.

26 73. Cross-Defendant Soule Park Golf Course, Ltd. (“Soule Park”) is a California
27 corporation organized and existing under the laws of the State of California and doing business in
28

Ventura County. City is informed and believes that Soule Park operates well(s) which extract water from the Ojai Valley Groundwater Basin.

74. Cross-Defendant St Joseph's Associates of Ojai, California, Inc. ("St. Joseph's") is a California corporation organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that St. Joseph's operates wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

75. Cross-Defendant Andrew Stasse ("Stasse") is an individual. City is informed and believes that Stasse operates well(s) which extract water from the Ojai Valley Groundwater Basin.

76. Cross-Defendant George S. Stuart ("Stuart") is an individual. City is informed and believes that Stuart operates well(s) which extract water from the Ojai Valley Groundwater Basin.

77. Cross-Defendant John Taft ("Taft") is an individual. City is informed and believes that Taft operates wells and/or diversions which extract surface and/or subsurface water from Coyote Creek.

78. Cross-Defendant Telos, LLC ("Telos") is a California Corporation organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that Telos operates well(s) which extract water from the Ojai Valley Groundwater Basin.

79. Cross-Defendant Thacher Creek Citrus, LLC ("Thacher Creek") is a California corporation organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that Thacher Creek operates wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

80. Cross-Defendant The Thacher School ("Thacher School") is a California non-profit organization organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that Thacher School operates well(s) which extract water from the Ojai Valley Groundwater Basin.

81. Cross-Defendant Tico Mutual Water Company ("Tico") is a California corporation organized and existing under the laws of the State of California and doing business as a mutual

1 water company in Ventura County. City is informed and believes that Tico operates wells that
2 extract water from the Upper Ventura River Groundwater Basin, affecting outflows from that
3 basin to Watershed.

4 82. Cross-Defendant Victor Timar (“Timar”) is an individual. City is informed and
5 believes that Timar operates well(s) which extract water from the Ojai Valley Groundwater
6 Basin.

7 83. Cross-Defendant Topa Topa Ranch Company, LLC (“Topa”) is a California
8 corporation organized and existing under the laws of the State of California and doing business in
9 Ventura County. City is informed and believes that Topa operates wells and/or diversions which
10 extract surface and/or subsurface water from San Antonio Creek.

11 84. Cross-Defendant Lou Tomesetta (“Tomesetta”) is an individual. City is informed
12 and believes that Tomesetta operates well(s) which extract water from the Ojai Valley
13 Groundwater Basin.

14 85. Cross-Defendant John Town (“J. Town”) is an individual. City is informed and
15 believes that J. Town operates well(s) which extract water from the Ojai Valley Groundwater
16 Basin.

17 86. Cross-Defendant Trudie Town (“T. Town”) is an individual. City is informed and
18 believes that T. Town operates well(s) which extract water from the Ojai Valley Groundwater
19 Basin.

20 87. Cross-Defendant Ernesto Vega (“Vega”) is an individual. City is informed and
21 believes that Vega operates well(s) which extract water from the Ojai Valley Groundwater Basin.

22 88. Cross-Defendant Ventura County Watershed Protection District (“VCWPD”) is a
23 California special district organized and existing under the laws of the State of California and
24 located in Ventura County. City is informed and believes that VCWPD operates wells and/or
25 diversions which extract surface and/or subsurface water from San Antonio Creek.

26 89. Cross-Defendant the Ventura River Water District (“VRWD”) is a California
27 special district organized and existing under the laws of the State of California and located in
28

Ventura County. City is informed and believes that VRWD operates wells that extract surface and/or subsurface water from the Ventura River and/or Watershed.

90. Cross-Defendant Wood-Claeysens Foundation (“Foundation”) is a 501(c)(3) charitable foundation registered in Delaware that owns the Taylor Ranch property and does business in Ventura County. Foundation operates wells, extracts groundwater, and has operated a surface diversion that extracts surface and/or subsurface water from the Ventura River and/or Watershed.

91. Cross-Defendant Calvin Zara (“Zara”) is an individual. City is informed and believes that Zara operates wells and/or diversions which extract surface and/or subsurface water from Matilija Creek.

Riparian Landowners

92. City is informed and believes that the following Cross-Defendants (“Riparian Landowners”) are owners of or are beneficial interest holders in real property located within the Ventura River Watershed, and they claim riparian rights to divert and/or extract surface and/or subsurface water from the Ventura River and/or its tributaries, whether or not they have exercised such riparian rights:

1970 Ranch Road, LLC;
625 N. Ventures Avenue, LLC;
Abraham Munoz;
Ahde and Ganea Lahti, individually;
Alan and Carol James, individually;
Alessandro Lobba and Mary E. Jackson,
individually as Trustees of the Looba-
Jackson Family Trust;
Alexander and Maria Doran, individually;
Alfredo and Montelle Bello, individually;
Alvin and Claudia Cunningham,
individually;
American Retirement Fund, Inc.;
Amy Mattison, Trustee of the Amy K.
Mattison Trust;
Anatoly and Margarita Kozushin,
individually;
Andrew and Jane Holguin, individually;

Andrew D. West and Patricia G. West,
individually as Trustees of the West Family
Revocable Trust;
Angie Mari Ganasei and Christopher Paul
Danch, individually as Trustees of the
Genasei-Danch Family Trust;
Anne Lombard and Frank Hanson,
individually;
Armando and Sendi Sanchez, individually;
Arthur Timothy and Maurya Kathleen Foy,
individually;
Ashlen and Ivy Aquila, individually;
Aubrey Balkind;
Auburn Oak Builders, Inc.;
Barry and Angela Ross, individually;
Behrooz Jadidollahi;
Benjamin and Stacey Vail, individually;
Berkley and Suzanne Baker, individually;
Bettina Chandler, Trustee of the Bettina

<p>1 Chandler Trust; 2 Blanche Chapler; 3 Bradford and Cheryl Boyd, individually; 4 Brent and Shanna Muth, individually; 5 Brian and Irene McConville, individually; 6 Brian and Joan Archer, individually; 7 Brian and Sharon Smith, individually; 8 Brian S. Stafford and Janice M. Thomas, 9 individually as Trustees of the Stafford 10 Thomas Family Trust; 11 Brian Skaggs, Trustee of the Skaggs Trust; 12 Brigitte Lovell, Trustee of the Lovell Living 13 Trust; 14 Bruce Abbott and Kathleen Quinlan, 15 individually; 16 Bruce and Dixie Gladstone, individually; 17 Bryan Whitley; 18 Bryce and Krista Belgium, individually; 19 Carl and Barbara Enson, individually; 20 Carmen Chavez and Guadalupe Patino, 21 individually; 22 Carol Nicholson; 23 Carol Ann Tennant, Trustee of the Carol 24 McDonnell Family Trust; 25 Carrie Murphy and Michael E. Templin, 26 individually as Trustees of the Templin- 27 Murphy 2016 Living Trust; 28 Cartin Family, LLC; Catherine E. Lee, Trustee of the Catherine E. Lee Trust; Chad Westcott and Heather Cushnie Wescott, individually; Charles E. Starbuck, Trustee of the Charles E. Starbuck Trust; Charles P. Watling, Trustee of the First Charles P. Watling Family Trust; Charline L. Rich and Richard Gibson Jr., individually; Christopher and Tina Abe, individually; Christopher Hart; Christopher Moore and Mary Moore, individually as Trustees of the Christopher Moore and Mary Moore Trust; Clair and Stacey Harding, individually; Claudia Zenobia Linarte, Trustee of the Olga Trust; Claudio and Magdalena Landeros, individually;</p>	<p>Community Memorial Health System; Connie S. Morgan, Trustee of the Connie S. Morgan Trust; Conservation Endowment Fund; Constance and Justin Campbell, individually; Corinne Anne Fraund; Craig and Ana Zwirn, individually; Curtis and Ory Names, individually; Cynthia Lee, Trustee of the Cynthia Lee Family Trust; D & J Campbell Best, LLC; Dan Newman; Dan Stuart, Trustee of the Dana Stuart Trust; Dan Wiseman; Dana and Dawn Cenicerros, individually; Daniel and Amy Yanez, individually; Daniel and Nancy McLaren, individually; Daniel and Rosalind Grimm, individually; Danny Broadhurst; Darren and Lisa Lisle, individually; David Friend and Angela Marie Friend, individually; David and Linda Smith, individually; David and Patti Wicklund, individually; David Chase and Anne Fitzgerald, individually; David E. Sissum, Jr. and Diana E. Sissum, individually as Trustees of the Sissum Trust; David Flick and Emma Flick, individually; Dawn and Mark Golden, individually; DB Properties, LLC; Del Cielo, LLC; Dennis and Susan Ryder, individually; Dennis Brown; Dennis Wood and Margaret Vigil Wood, individually; Diane Ruth White, Trustee of the Diane Ruth White Living Trust; Dive Deep, LLC; Donald and Wendy Givens, individually; Donald Campbell; Donna and James Kleeburg, individually; Dorothy Holmes, Trustee of the Holmes Trust; Dorothy Lanquist; Douglas Freeman and Miranda Margetts, individually;</p>
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1 DZ SPE, LLC;
2 Earl G. Holder, Trustee of the Holder
3 Survivors Trust;
4 Edward and Geraldine Lee, individually;
5 Edward C. Leicht and Jacqueline M. Leicht,
6 individually as Trustees of the Leicht Family
7 2013 Revocable Trust;
8 Eleanor Small;
9 Elena Dhyansky, Trustee of the Elena
10 Dhyansky Trust;
11 Elizabeth Keenen;
12 Elton Pedersen and Alma Clayton Pedersen,
13 individually;
14 Eric and Jodi Perdue, individually;
15 Eric and Ming Jun Nakamura, individually;
16 Eric and Trisha Johnson, individually;
17 Eric Lawrence Bernthal, Special Trustee of
18 the Boss and Venice Trust;
19 Eric Lewis and Bobbi Roderick Lewis,
20 individually;
21 Erik and Tirica Eads, individually;
22 Eugene and Charlotte Elerding, individually;
23 Evelyn Frament;
24 Fortune Builders, Inc.;
25 Frank Robert Walker Jr. and Carrie Ellen
26 Walker, individually as Co-Trustees of the
27 Walker Jr. Living Trust;
28 Frederick and Lori Ponce, individually;
Galen and Maria David, individually;
Gary Hirschcron, Trustee of the Gary
Hirschcron Revocable Trust;
Gary L. Wolfe, Successor Trustee of the
Carolyn M. Tastad Revocable Trust;
Gary and Terri McCaskill, individually as
Trustees of the McCaskill Family Trust;
Gary Speeds and Lisa R. Kirby, individually
as Trustees of the Gary Speeds and Lisa
Kirby Family Trust;
Gelb Enterprises;
George and Pamela Zeller, individually;
George and Roxanne Pelt, individually;
George Hernandez;
George Lawhead, Trustee of the George and
Carole Lawhead Revocable Trust;
Girl Scouts Of California's Central Coast;
Glenn and Lori Ahlberg, individually;
Gordon and Patricia Black, individually;
Gralar, LLC;

Graydon and Helen Harrah, Individually;
Gregory and Michele Hammed, individually;
Gregory Cavette;
Gregory Grant and Mary King, individually;
Hans and Annika Gruenn, individually;
Hendrika Maria Von Hecht;
Henry and Geneva Oliva, individually;
Henry and Leslie Sohm, individually;
Howard and Irene Hoos, individually;
Hugh and Lindsay Thomson, individually;
Intell Ventura, LLC;
Irma Tracy;
Jackie M. Springer, Trustee to the Jackie M.
and Lanie Jo Springer Trust;
James and Andrea Pendleton, individually;
James and Gayle David, individually;
James and Staci Valencia, individually;
James and Sue Mills, individually;
James and Trisha Proud, individually;
James and Zelda Carr, individually;
James Peck;
James I. Pio, Trustee of the James I. Pio
Trust;
Jan M. Hiester, Trustee of the Jan M. Hiester
2014 Living Trust;
Jane E. Hanchett, Trustee of the Hanchett
Family Trust;
Jane Spiller, Trustee of the Jane Spiller
Trust;
Janet Lewis, Trustee of the Janet T. Lewis
Family Trust;
Janet Peck, Trustee of the Janet Lee Peck
Living Trust;
Jeannette Curtis;
Jeffrey E. Frank, Trustee of The Frank Trust;
Jeffrey Tubbs and Lynn Dubowy Duran,
individually;
Jennie Scott, Trustee of the Jennie Scott
Family Trust;
Jennifer Ware and Jamie Selby, individually;
Jeremy August and Icole Marie Ferro,
Individually;
Jesse Wadsworth and Susan Hynds,
individually;
Jesus Cornejo and Idania Yudith Cornejo,
individually;
Joan Kenton, Trustee of The Joan Kenton
Living Trust;

<p>1 Joanna Pope; 2 Joel Hernandez; 3 Johanna Collins; 4 John and Lisa Dillard, individually; 5 John and Mari Allen, individually; 6 John and Nancy Bevans, individually; 7 John and Nila Ventress, individually; 8 John Edward and Evonne Louise Vacca, 9 individually; 10 John Gutierrez; 11 John Mazzola and April Golden, 12 individually; 13 John Taft Corporation; 14 Jon Hanson; 15 Jonathan and Jacqueline Parker, 16 individually; 17 Jonathan and Julie Teichert, individually; 18 Jose Juarez and Ana Valencia, individually; 19 Jose Valadez and Norma Hernandez, 20 individually; 21 Joseph Palmoutsos as Trustee of the Joseph 22 Constantinos Palmoutsos Living Trust; 23 Joseph Polito, Trustee of the Joseph R Polito 24 1989 Trust; 25 Joshua Antelman; 26 Joyce Frenette; 27 Juan Espinoza and Travis Coker, 28 individually; Juana and Henry Murillo; individually; June M. Spar, Trustee of the June M. Spar Living Trust; Jurgen Gramckow and Geraldine Gramckow, individually as Trustees of the J&G Trust; Justin and Rachael Jayne, individually; Karen Mendoza, Trustee of the Vork Family Trust; Katherine Patton and Virginia Mcconnell, individually; Kathleen Turner and Elizabeth Renn, individually; Kay Burns; Ken Collin; Kenneth and Maria Baker, individually; Kenneth S. Collins, Trustee of the Frank R. Walker, Jr. Trust; Kent and Patricia Hardley, individually; Kevin K. Cox and Mary C. Cox, individually</p>	<p>as Trustees of the Cox Family Trust; Kim Jirka, Trustee of the Kim Jirka Trust; Konstantin Demidov, individually; Kyle Brown; Lance and Donelle Woleslagle, individually; Larry and Cecilia Hickok, individually; Larry Hubenthal, individually and as Trustee of the Larry Hubenthal Living Trust; Laszlo and Sharon Bihari, individually; Laszlo Engelman, Trustee of the Engeman Family Trust Laughing Dog Ranch, LLC; Laverne M. Browning; Lawrence and Rachel Clevenson, individually; Leon and Cecelia Carter, individually; Leonard Fischer; Lorenzo Gama and Ylda Cisnero, individually; Loretta May Williams, Trustee of the Loretta May Williams Revocable Living Trust; Lucille Jane Conforti and Randall Norman Kirk, individually as Co-Trustees of the "Lucille Jane Conforti Trust"; Lynn and Ann Henne, individually; Lynn Gotch and Linda Oliver, individually; Manuel and Sandy Garcia, individually; Marilyn Wallace, Trustee of the Marilyn Wallace Separate Property Trust; Mario Aguirre and Patrice Vernand, individually; Mark and Megan Steffy, individually; Mark Anthony and Kim Marie Crane, individually; Mark Robbins, Trustee of the Mark Robbins Trust; Martin and Darian O'brien, individually; Martin and Linda Gramckow, individually; Martin Gramckow, Trustee of the Monika G. Huss Irrevocable Trust, Trustee of the Karin W. Gramckow Irrevocable Trust, Trustee of the Kurt J. Gramckow Irrevocable Trust; Marvel Pierce; MaryAnn Hepp Hill, Trustee of the Hill Family Trust; Mary Bergen, Trustee of the Rosemary Hall Bergen Trust; Mary Morrison;</p>
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<p>1 Mary Walkart and William Hastings, individually; 2 Matilija Canyon Alliance; 3 Matthew and Claudia Wilson, individually; Matthew Arreola; 4 Matthew Bowe; Matthew Dwyer and Colleen Walker, 5 individually; Matthew Larrew and Jordana Kaban, 6 individually; Matthew Simon and Amanda Vino, 7 individually; 8 Michael and Carol Davis, individually; Michael and Cindy Boehm, individually; 9 Michael and Hannalore Gresser, individually; 10 Michael and Kathy Ogden, individually; Michael and Kim Regan, individually; 11 Michael and Marie Mctavish, individually; 12 Michael and Patricia Mcweeney, individually; 13 Michael Coggins Jr. and Cynthia Coggins, individually; 14 Michael Greynald, Trustee of the Greynald Family Trust; 15 Michael L. Rockhold, Trustee of the Michael Rockhold Trust; 16 Michael Tello; 17 Michele Willis and Johanna Collins, individually; 18 Miguel A. Mayorga, Trustee of the Edward R. Mayorga Living Trust; 19 Mitchael and Rubeena Breese, individually; 20 Mitchell and Ana Yount, individually; Mitchell and Joy Dalbey, individually; 21 Mitchell and Lisa Myers, individually; Nancy Moore, Trustee of the Nancy Anne 22 Moore Separate Property Trust; Nikolas and Julia Krankl, individually; 23 Offshore Crane, Inc.; 24 Offshore Crane and Service Company, Inc.; Offshore Facilities; 25 Ojai Valley Conservancy; Orville and Marion Hernvall, individually; 26 Orville and Pamela Hibdon, individually; 27 Oswaldo and Norma Ruiz, individually; Pacific Telephone and Telegraph Company; 28 Pamela Wood;</p>	<p>Patric and Margaret Peake, individually; Patricia and Edward Lansberg, individually; Patricia Cuenot; Patrick and Cathy Pagnusat, individually; Paul and Angela Booth, individually; Paul and Ashley Ramsey, individually; Paul and Maria Lozano, individually; Paul and Martha Medlar, individually; Paul and Opal Skaggs, individually; Peter and Kelli Freiberg, individually; Peter and Robin Shedlosky, individually; Peter Brooks and Carla Brooks, individually and as Trustees of the Escoda Brooks Family Trust; Peter Cambier, Trustee of the Peter and Marilyn Cambier Trust; Peter Schey, LLC; Peuvlin Vong; Philip and Delia Smith, individually; Philip Ferrante Jr. and Nicole Aversa- Ferrante, individually; Philippe Rousseau and Kimberly Shobe, individually; Phyllis Courtney; Rafael Hernandez; Ramona L. Andrew, Trustee of the Ramona L. Andrews Trust; Rancho Arnaz, LLC; Rancho Casitas, LLC; Rancho Sueno, LLC; Ray and Carolina Guillen, individually; Raymond and Annette West, individually; Richard and Laura Mancilla, individually; Richard and Alexandra Dubeau, individually; Richard and Cynthia Robinett, individually; Richard Bolton; Richard Mathieu and Claudia Herrera Mathieu, individually; Richard Michael and Margaret Kenny, individually; Richard Wiles and Peggy Carey, individually; Robert Alan and Stacey Jean Boyd, individually; Robert and Carolyn Jarboe, individually; Robert and Judith Clark, individually; Robert and Nickey Gregory, individually;</p>
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<p>1 Robert and Patricia Mcfall, individually; 2 Robert and Susan Bennitt, individually; 3 Robert and Anna J. Auric, individually as 4 Trustees of the Auric Revocable Trust of 5 1999; 6 Robert Levin and Lisa Solinas, individually; 7 Robert Mark and Lorraine Melisa Lovato, 8 individually; 9 Robert OConnor; 10 Robert Petrin and Beate Schickerling, 11 individually; 12 Robert L. Stone, Trustee of the Robert L. 13 Stone Revocable Living Trust; 14 Robert S. Young, Trustee of the Young 15 Trust; 16 Ronald and Janis Calkins, individually; 17 Ronald Kaplan and Cynthia Daniels, 18 individually; 19 Rudolph and Carol Saldamando, 20 individually; 21 Russell James Hall, Trustee of the Russell 22 James Hall Family Trust; 23 Sam and Debbie Tucker, individually; 24 Scott Alan and Eva Prince Weiss, 25 individually; 26 Scott and Aki Freshman, individually; 27 Scott and Bernadette King, individually; 28 Scott and Sarah Mckay, individually; Scott Gregory Erockson and Hannah Beth Guzik, individually; Scott R. Johnson and Margaret Bates, individually; Serafin Calderon and Blanca Ortiz; individually; Shane and Amy Watkins, individually; Shane Nash; Sharon and Bruce Spencer, individually; Sharon Brown, Trustee of the Sharon Brown Living Trust; Shaun and Daisy Garman, individually; Shirley M. Palmer, Trustee of the Shirley Palmer Revocable Trust; Societe d'Investissement Immobiliers et Financiers Franco-Allemand, a French corporation; Stanley Stephen Roslansky and Linda Roslansky, individually as Trustees of the Roslansky Family Trust;</p>	<p>Stephen and Carin Kally, individually; Stephen and Cindy Barrack, individually; Stephen Carr and Debra Gill, individually; Stephen M. Johnson, Trustee of the Stephen M. Johnson Living Trust; Stephen Sanford; Stephen Zane Fraser; Stuart and Nancy Rupp, individually; Sudarshan Gautam; Susan Gary; Susan M. Ralph, Trustee of the Ralph Trust; Susan Yarnell; Sushma Gujral; Suzanne Rhodes, Trustee of the Bateman- Rhodes Family Trust; T. Snyder; Tamarra Barbey; Tane Charles Arnold, individually and as Trustee of the Tane C. Arnold 2006 Living Trust Teen Challenge of Southern California, Inc.; Terra Crowley; Terrance O'Connor and Kathy Franklin, individually; The Baptiste Foundation; The Ojai Valley Land Conservancy; Theodore and Judy Lucas, individually; Theodore and Norma Schneider, individually; Theodore and Pearl Malos, individually; Theodore and Tracy Mandryk, individually; Theodore Willis Malos, Jr. and Pearl B. Malos, individually and as Trustees of the Malos Family Trust,; Thomas and Christine Reed, individually; Thomas and Nikki Young, individually; Timothy and Nicole Beckett, individually; Tobias and Tania Parker, individually; Todd Hernard and Kibhi Marie Henard, individually; Tropico, LLC; Victor and Sheryl Sanchez, individually; Victoria and John Junkin, individually; Vida Vida, Trustee of the Vida Family Trust; Vijay and Neeta Patel, individually; Virginia I. Williamson, individually, and as Trustee of Trust of Virginia I. Williamson; Virginia Trevino;</p>
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Walid A. Alawar, Trustee of the Walid A. Alawar Living Trust;	William and Paula Stevens, individually;
Warren Heath;	William Loughboro;
William and Cheryl Meade, individually;	William Starr;
William and Helen Peck, individually;	Yong Yi;
William and Irene Snively, individually;	Yvette Marie and Daniel Joseph Sinohui, individually;
William and Kimbra Carnaghe, individually;	Zachary and Diane Totten, individually

Riparian and Overlying Landowners

93. City is informed and believes that the following Cross-Defendants (“Riparian and Overlying Landowners”) are owners of or are beneficial interest holders in real property located within the Ventura River Watershed and overlying one or more of Watershed’s Groundwater Basins (Upper Ventura River Groundwater Basin; Ojai Valley Groundwater Basin; Lower Ventura River Groundwater Basin; and Upper Ojai Valley Groundwater Basin), and they claim riparian rights to divert and/or extract surface and/or subsurface water from the Ventura River and/or its tributaries, whether or not they have exercised such riparian rights, and/or they claim overlying rights to extract groundwater from one or more of the Watershed’s Groundwater Basins, whether or not they have exercised such overlying rights:

1300 Shippee Lane, LLC;	Alberto and Adriana Montano, individually;
3584 Calle Moreno, LLC;	Alberto and Hilda Zamora, individually;
Aaron and Angela Hoekstra, individually;	Albine Hopcus and Alva Lydia Hopcus, individually as Trustees of the Al and Alva Trust;
Abel and Lourdes Carranza, individually;	Alfonso and Alejandra Limon, individually;
Acslayton, LLC;	Allan and Janis Parkhurst, individually;
Adam Casey and Brittany Chisum, individually;	Allan and Katharine Parigian, individually;
Adam Distl, Jr. and Barbara B. Distl, individually as Trustees of the Adam Distl, Jr. and Barbara B. Distl 1998 Revocable Trust;	Allan and Mary Doane, individually;
Adrian Ogden;	Allen Vail;
Aera Energy, LLC;	Alvaro and Elva Ruiz, individually;
Ajr Investment Partnership, LP;	Alvin and Claudia Cunningham, individually;
Alan and Deborah Sharon, individually;	Ana Cross, Trustee of the Ana Cross Family Trust;
Alan and Leslie Connell, individually;	Andre Keunzli and Fabienne Keunzli-Monard, individually;
Alan and Mary Kirby, individually;	Andrew and Melissa Maccalla, individually;
Alan and Susan Ecker, individually;	Andrew and Rebecca Chandler, individually;
Alan Walbridge and Dorothy Fay Walbridge, individually;	Andrew and Sharon Engel, individually;

<p>1 Angela Jayne Gardner and John Percival 2 Mawson, individually as Trustees of the 3 Pleasant Avenue Living Trust; 4 Anita J. Diaz; 5 Ann H. Donlon, Trustee of the Ann H. 6 Donlon Revocable Trust; 7 Anna Archer; 8 Anna Kirkwood; 9 Anne and Daniel Goldstein, individually; 10 Arne Anselm, Trustee of the Velderrain M. 11 Trust; 12 Anson B. Thacher and Anne F. Thacher, 13 individually as Trustees of the A. and A. 14 Thacher Living Trust; 15 Anthony Becchio and Denise Heimo, 16 individually; 17 Anthony Masiel; 18 Antonio Espino and Maria Torres, 19 individually; 20 Arne Anselm and Michelle Velderrain, 21 individually; 22 Arne Anselm, Trustee of the Velderrain M. 23 Trust; 24 Ashley and Victoria Edwards, individually; 25 Baldemar Alcantar and Micaela Ortiz 26 Alcantar, individually; 27 Barbara A. Fitzgerald, Trustee of the 28 Fitzgerald 1994 Trust; Barbara Bonsignori; Barbara Chen Lowentha, Trustee of the 2017 Barbara Kay Chen Lowenthal Revocable Trust; Barbara Hall, Trustee of the Barbara Hall Living Trust; Barnard Properties, LLC; Bart Kennedy; Barton Kennedy; Bernard Martin; Beth E. Lindley; Bettyann Sessing; Big Black Dog, LLC; Blaze Buonpane; Bradley and Andrea Roe, individually; Bradley and Ivelou Pantoskey, individually; Brand and Tressa Kahler, individually; Brandon and Kelsie Schneider, individually and as Trustees of the Brandon Schneider and Kelsie Simms-Schneider Family Trust;</p>	<p>Breal and Karen Rowe, individually; Brendan Richard and Christa Lee Dawn Freeman, individually; Brent and Pamela Lamo, individually; Brett and Lynn Wilson, individually; Brett Cunningham; Brett Nicholson and Nan Davis, individually; Brian and Cynthia McDaniel, individually; Brian and Erin Edwards, individually; Brian and Jean Harrison, individually; Brian and Marie Haase, individually; Brian and Siobhan Calvin, individually; Brian A. Schaffels; Brian Osborne and Kirsten Hinrichs, individually; Brittany and Alan Fletcher, individually; Bruce and Leslie Bouche, individually; Bruce and Virginia Hibberd, individually; Bruce C. Brockman and Bridget Tsao- Brockman, individually as Trustees of the Tsao Brockman Family Trust; Bryan and Nicole Crawford, individually; Bulmaro and Alfonsa Pena, individually; Byron and Jennifer Greene, individually; Byron Rader and Myra Toth, individually; Cal B. Land Co., LLC; Calatlantic Group Inc.; Camp Ramah in California Inc.; Carl and Judith Bell, individually; Carl and Leigh Hyndman, individually; Carl Gaddis and Anna Hicks, individually; Carla Dennis, Trustee of the Carla D. Dennis Trust; Carla Melson and Carla J. Melson, individually as Trustees of the Carla J. Melson Revocable Living Trust; Carmen and Carolina Murillo, individually; Carol Marquez-Olson, Trustee of the Carol Marquez-Olson Trust; Carol Vesecky, Trustee of the Carol B. Vesecky Revocable Living Trust; Caroline Turner, Trustee of the Turner Survivors Trust; Carolyn Bowman, Trustee of the Carolyn Bowman 2008 Trust; Carolyn Huish; Caryn Molinelli;</p>
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- 1 Catherine Lancaster;
- 2 Catherine Sellman;
- 3 Catherine Smith, Trustee of the Catherine L.
- 4 Smith Revocable Trust;
- 5 Cesar and Davienne Guerra, individually;
- 6 Cesar Jimenez and Aura Minera,
- 7 individually;
- 8 Chaarenne Torris and Raymond Bradley,
- 9 individually;
- 10 Southern California Association of Seventh
- 11 Day Adventists;
- 12 Chad Carper;
- 13 Chad Ress and Stephanie Washburn,
- 14 individually;
- 15 Chad Vick, Trustee of the Chad C. Vick
- 16 Trust;
- 17 Charlene Van Deusen;
- 18 Charles and Deana Sherry, individually;
- 19 Charles and Jo Bennett, individually;
- 20 Charles G. Barnett, Successor Trustee of the
- 21 "Barnett Family Exemption Equivalent
- 22 Trust";
- 23 Charles L. Hoff and Kathleen D. Hoff, Co-
- 24 Trustees of the Hoff Revocable Trust;
- 25 Charles Monn and Elena Hale, individually;
- 26 Charles R. Rudd and Lola L. Rudd, Trustees
- 27 under the Charles R. Rudd and Lola L. Rudd
- 28 Trust;
- Claudia Farr, Trustee of the Sam S. Farr and
- Claudia S. Farr Trust;
- Claudia Wunderlich, Trustee of the Claudia
- A Wunderlich Trust;
- Clementine Turner, Trustee of the
- Clementine Turner Living Trust;
- Cody Green;
- Cody Stevens;
- Connie Anaise;
- Connie Cline, Trustee of the Mark Terry
- Cline Family Trust;
- Constance Eaton;
- Cory and Nicholas Wingate, individually;
- County of Ventura;
- Craig and Stephanie Gardner, individually;
- Craig Young and Daniel Poling,
- individually;
- Culbert Family Partnership;
- Curtis and Christina Tolmie, individually;
- Cynthia Ellis and Pamela Thomas,
- individually;
- Daj Properties, LLC;
- Damian and Lorie Vos, individually;
- Damon and Anne Brink, individually;
- Daniel and Adaya Walsh, individually;
- Daniel and Deborah Hoyt, individually;
- Daniel and Elizabeth George, individually;
- Daniel and Elizabeth McLaughlin,
- individually;
- Daniel and Jane Kelly, individually;
- Daniel and Lydia Ruark, individually;
- Daniel and Ralph Fairbanks, individually;
- Daniel and Tomica Mora, individually;
- Daniel and Yoko Mcsweeney, individually;
- Daniel Chryenko;
- Daniel Crane;
- Daniel H. I. and William D. Moses Jr.,
- individually as Trustees of the William D.
- Moses, Jr. Separate Trust No. 1;
- Daniel Hultgen, Trustee of the Hultgen
- Living Trust;
- Danny Haar and Mariska De Feiter,
- individually;
- Darrell Ralston, Trustee of the Darrell
- Anthony Ralston 2009 Revocable Trust;
- Dave and Kathleen Tarrats, individually;
- David and Beverly Fulton, individually;
- David and Carol Cintron, individually;
- David and Deborah Todd, individually;
- David and Donna Berger, individually;

- 1 David and Elizabeth Silva, individually;
- 2 David and Fereshta Sinclair, individually;
- 3 David and Karen Brubaker, individually;
- 4 David and Kathleen Ostby, individually;
- 5 David and Laura Meisch, individually;
- 6 David and Laurie Mahan, individually;
- 7 David and Meghan Sandoval, individually;
- 8 David and Mindy Benezra, individually;
- 9 David and Peggy Stanwood, individually;
- 10 David and Sandra Murillo, individually;
- 11 David and Shannon Richard, individually;
- 12 David and Sharron Sparks, individually;
- 13 David and Stephanie Berger, individually;
- 14 David and Toni Johnson, individually;
- 15 David Corey and Jean Scholes, individually;
- 16 David E. Pressey and Agnes E. Pressey,
- 17 individually as Trustees of the David E. and
- 18 Agnes E. Pressey Family Trust;
- 19 David Kille and Shannon Frew, individually;
- 20 David L. Garber and Cynthia Garber,
- 21 individually as Trustees of the Garber Trust;
- 22 David Orbach and Eva Araujo, individually;
- 23 David Stanley and Monica Bednar Stanley,
- 24 individually;
- 25 Dawn and Barclay Hope, individually;
- 26 De and Jacque Pisciotta, individually;
- 27 Dean and Gloria Vadnais, individually;
- 28 Dean and Lorinda Strong, individually;
- Deanna Gonzales, individually;
- Deirdre Lynds, individually;
- Delavan C. Garst and Sharon D. Garst,
- individually as Trustees of the Delavan and
- Sharon Garst Family Trust;
- Dell and Anne Mercer, individually;
- Delores and Jerry Berlin, individually;
- Denise Wizman, as Trustee of the Denise
- Wizman Revocable Trust;
- Dennis and Cheryl Jacobs, individually;
- Dennis and Nadine Corte, individually;
- Derek Meek;
- Devon and Jillianne Collinge, individually;
- Diana Engle, Trustee of the Diana L Engle
- Revocable Trust;
- Diana Peron, Trustee of the Diana C Peron
- Living Trust;
- Diana Syvertson, Trustee of the Diana
- Syvertson Living Trust;
- Diana Trent, Trustee of the Diana Trent
- Living Trust;
- Diane and William Clegg, individually;
- Dianne Mccourtney, Trustee of the Dianne
- Louise Mccourtney Trust;
- Dolores Keith;
- Dominic Habibi;
- Donald and Clara Tenpenny, individually;
- Donald Brosnac and Twila Carlsen,
- individually;
- Donald Davis;
- Donald G. and Susan B. Davis, individually
- as Trustees of the Donald G. and Susan B.
- Davis Revocable Family Trust of 1997;
- Donis Montoya Jr. and Teresita Montoya,
- individually;
- Donna Deitch, Trustee of the Donna E.
- Deitch Trust;
- Donna Epstein, Trustee of the Epstein
- Survivors' Trust, Trustee of the Epstein
- Marital Trust, and Trustee of the Epstein
- Bypass Trust;
- Dorothy and James Kehoe, individually;
- Dorthea Keck;
- Douglas and Ann Parent, individually;
- Douglas and Claudia Webber, individually;
- Douglas and Elisabeth Vernand,
- individually;
- Douglas and Kathleen Leighton,
- individually;
- Douglas and Moira Volpi, individually;
- Douglas Draper;
- Douglas Wasson, Trustee of the Wasson
- Trust;
- Dustin Beilke;
- Ed and Linda Colby, individually;
- Edson Taft, Trustee of the Edson B. Taft
- Revocable Trust;
- Edward and Deborah Guerra, individually;
- Edward and Laura Savala, individually;
- Edward and Nancy Dennis, individually;
- Edward and Nancy Necker, individually;
- Edward and Roberta Walsh, individually;
- Edward Dunn and Judith Shelby Dunn,
- individually;
- Edward Pressey;
- Edwin Norris Procter, Trustee of the "E.
- Norris Procter Living Trust";

<p>1 Eilam Byle, Trustee of the Eilam Byle Living Trust; 2 Eileen Sterling, Trustee of the Eileen M. Sterling Revocable Trust; 3 Eileen Walker; 4 El Sereno 1225, LLC; Elaiene Keeley, Trustee of the Elaiene 5 Keeley Trust; Elaine Ferguson; 6 Eli and Jessica Neiderhiser; Elia Aldapa; 7 Elizabeth Bauer, Trustee of the Elizabeth A Bauer Trust; 8 Ellen Leopold; 9 Elmer and Joan Swift; Emily Benson and Lisa Martel, individually; 10 Emily Clay and Matthew Goodman, individually; 11 Erbay and Velda Garcia, individually; 12 Eric and Arlene Schwerdtfeger, individually; Eric and Jolene Harrington, individually; 13 Eric Bush and Craig Young, individually; Eric Dilks, Trustee of the Eric M. Dilks 2004 14 Revocable Trust; Eric Goode; 15 Eric Moore; 16 Eric Rosenberg; Ernest and Dorothy Nichols, individually; 17 Ernest Thornsberry, Trustee of the Ernest Thornsberry Revocable Trust; 18 Esperanza and Sandra Guerrero, individually; 19 Eugenijus Valiulis, Trustee of the Eugenijus Valiulis Revocable Living Trust; 20 Eusebio and Lori Navarro, individually; 21 Evelyn Baran, Trustee of the Evelyn F Baran Personal Residence Trust; 22 Ezequiel and Amber Monarrez, individually; 23 Felix and Delmy Garcia, individually; Fernando Porras; 24 Feroz and Mona Zaidi, individually; Finch Farms, LLC; 25 Merewether Judson, LLC; 26 Floyd and Charlene Fitzgerald, individually; Floyd Eugene Wiancko and Hiroko 27 Wiancko, Trustees of the Wiancko Family Trust; 28 Forest Home, Inc.;</p>	<p>Fortune Real Estate 888, LLC; Francis and Shauna Longstaff, individually; Francisco and Angelica Valles, individually; Frank and Lila Sheltren, individually; Frank C. Urias and Evangeline S. Urias, individually as Trustees of the Urias Family Trust; Frank Charolla; Frank Edward Sheltren, Jr., aka Frank E. Sheltren and Rita Cheryl Sheltrem, individually as Trustees of the Sheltren Family Trust; Fred and Carine Fisher, individually; Fred and Donna Stevens, individually; Fred Kramer and Michaela Watkins, individually; Frederic Devault; Frederick and Laura Fulmer, individually; Frederick Sloman and Nordi Hintze, individually; Fredrick and Roxanne Baker, individually; Future Mhps, LLC; Gabriel and Margarita Mendoza, individually; Gale and Bernabe Gaona Jr., individually; Gary and Chari Petrowski, individually; Gary and Colleen Fry, individually; Gary and Jolene Clarke, individually; Gary and Judith Stever, individually; Gary and Patricia Tucker, individually; Gary and Teresa Downard, individually; Gene and Patty Saito, individually; Genneva Maschler and Richard Yaciuk, individually; Geoffrey and Paula Clarke, individually; Geoffrey Brown and Stephanie Gibson, individually; George and Linda Boston, individually; George and Lynn Malone, individually; George and Margaret Melton, individually; George and Sigrid Bressler, individually; George Stuart; Gerald and Darlene Carlson, individually; Gerard Linsmeier; Gerben and Jill Hoeksma, individually; Gino Lynch; Glenn Myers, Trustee of the Glenn C. Myers Family Trust;</p>
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| <p>1 Gordon and Terry Hanusek, individually;
 2 Gordon Gibbons, Trustee of the Gordon R.
 3 Gibbons Living Trust;
 4 Grant Kemp;
 5 Greg and Julie Tebo, individually;
 6 Gregg and Rosie Dierickx, individually;
 7 Gregg Olson, Trustee of the Gregg W. Olson
 8 Revocable Trust;
 9 Gregory and Kaori Golden, individually;
 10 Gregory and Martha Lepine, individually;
 11 Gregory and Sarah Delvecchio, individually;
 12 Gregory and Susan Gilbert, individually;
 13 Gregory and Susan Ignacio, individually;
 14 Gregory and Suzanne Combs;
 15 Gregory Heras and Rozanne Bonavito,
 16 individually;
 17 Gregory Johnson;
 18 Gregory N. Pimstone and Lauryn B. Harris,
 19 individually as Trustees of the Pimstone
 20 Family Trust;
 21 Griffin and Nicole Williamson, individually;
 22 Gudaz, LLC;
 23 Gunild Seadrift;
 24 Guy and Sheri Flasch, individually;
 25 Guy Bratton;
 26 H and Beverly Leard, individually;
 27 Hacienda Ladera, LLC;
 28 Hank and Alana Garcia, individually;
 Hans and Eileen Van Koppen, individually;
 Harald Wagner;
 Harlan Kossow;
 Harrison Hill and Lauren Wilson,
 individually;
 Harry and Marilyn Lehr, individually;
 Harry Joe;
 Hayden and Raquel White, individually;
 Hector and Rocio Torres, individually;
 Heliberta Valencia;
 Help of Ojai, Inc.;
 Henry and Moira Tarmy, individually;
 Hermann and Gay Thomsen, individually;
 Hickey Bros Land Co. Inc.;
 Holly Bassuk;
 Howard and Ruth Miller, individually;
 Howard Altman, Trustee of the Gerta Maritz
 Trust;
 Hoyt Tarola;
 Ian and Carol Atkinson, individually;</p> | <p>Ignacio and Rose Vega, individually;
 Imelda Mares, Trustee of the Imelda Mares
 Trust;
 Industrial Ventura;
 Integritas Ojai, LLC;
 Irma Cruz;
 Irshad and Linda Haque, individually;
 Isidro Sanchez;
 J Investments;
 J McGlinchey;
 Jack and Marie Kenton, individually;
 Jack and Simone Patterson, individually;
 Jack and Verna Turbyville, individually;
 Jacob and Anja Zimmerman, individually;
 Jacqueline Dorfman, Trustee of the
 Jacqueline Dorfman Revocable Living Trust;
 Jacqueline Urband;
 Jakob and Marianne Vos, individually;
 James and Alisa Varney, individually;
 James and Daniela Casey, individually;
 James and Dori Sandefer, individually;
 James and Janet Lecroy, individually;
 James and Laura Fernandez, individually;
 James and Maryetta Sanders, individually;
 James and Penny Harvey, individually;
 James and Randi Catlett, individually;
 James and Wendy Osher, individually;
 James Data;
 James Finley, Trustee of the James and M.
 Reen Finley Family Trust;
 James Finch, Trustee of the Finch Family
 Trust;
 James J. Finch and Lorraine Holve Finch,
 individually as Trustees of the James J.
 Finch and Loraine Holve Finch Living Trust;
 James Paul Finch;
 James Kirk and Jacelyn Hayes, individually;
 James Selman, Trustee of the James C.
 Selman Revocable Inter Vivos Trust;
 James W. Coultas and Margaret Coultas,
 Trustees of the James A. and Margaret H.
 Coultas Intervivos Trust;
 Terry Coultas Wilson;
 James W. Coultas, Trustee of the Coultas
 Living Trust;
 Jan and Priscilla Granade, individually;
 Jane Mccord, Trustee of the Jane Ann
 Mccord Living Trust;</p> |
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<p>1 Janet McGinnis, Trustee of the Janet Karen 2 McGinnis Trust; 3 Janice and Jesse Hillestad, individually; 4 Janice Hall, Trustee of the Hall Trust; 5 Janis Long Nicholas and Jess E. Long, 6 individually as Co-Trustees of the Long 7 Family Trust; 8 Jason and Jene Loomis, individually; 9 Jason and Kathryn Headley, individually; 10 Jason and Lana Spear, individually; 11 Jason Loomis; 12 Jasper and Jessica Jones, individually; 13 Jayne Pendergast, Trustee of the 2014 Jayne 14 E Pendergast Trust; 15 Jeff and Cheree Simons, individually; 16 Jeff and Desiree Wilby, individually; 17 Jeff Mabry; 18 Jefferie Skaggs and Timothy Bunce, 19 individually; 20 Jeffrey and Denise Helm, individually; 21 Jeffrey and Donna Meyer, individually; 22 Jeffrey and Holly Lieber, individually; 23 Jeffrey Jensen; 24 Jeffrey Kenton, Trustee of the Jeffrey T. 25 Kenton 2004 Revocable Living Trust; 26 Jeffrey S. Bacon, Trustee of the Villa Nero 27 Trust; 28 Jeffrey Weinstein; Jeffery and Fiona Pougher, individually; Jennifer Kistler, Trustee of the Jennifer L Kistler Trust; Jeremy and Britannia Rennie, individually; Jeri Leonard; Jerome H. Hittleman and Lynne M. Goldfarb, Trustees of the Jerome H. Hittleman and Lynne M. Goldfarb Revocable 2016 Trust; Jerry Dean Miner and Geraldine Ann Miner, Trustees of the Miner Trust; Jess Earl Long; Jessie Stricchiola and Rosemary Garrison, individually as Trustees of the Phoenix Revocable Trust; Jesus and Maria Ramos, individually; Jill Olivares, Trustee of the Jill Ann Olivares Revocable Living Trust; Jimmy and Theresa Ramirez, individually; JLB Rancho Vista, LLC;</p>	<p>Joan Geddes and John Saluppo, individually; Joan Robles; Joann Benson, Trustee of the Joann Alva Benson Revocable Living Trust; Joanne Barnes, Trustee of the Barnes Family Trust; Joel Fox and Jennifer Day, individually; Joel Vuylsteke, Trustee of the Country Club Trust; Johanna Rae Long; John and A. Elrod, individually; John and Alitea Maruszewski, individually; John and Crystal Peakes, individually; John and Janis Nicholas, individually; John and Lucille Elrod, individually; John and Monica Hartmann, individually; John and Norma Curtis, individually; John and Parris Collins, individually; John and Patricia Essick, individually; John and Tonya Peralta, individually; John and Victoria Bortolussi, individually; John Battel, Trustee of the John J Battel Living Trust; John Broomfield, Trustee of the John Nicholas Broomfield Trust; John F. Johnston and Katherine M. Johnston, individually as Trustees of the John Fraser Johnston Family Trust; John Haigh; John Kertis; John Mutlow; John Pace, Trustee of the John Brice Pace Family Trust; John Richardson; John Vineyard; John Warner and Jennifer Dunn, individually; John Willingham; John Winspear; John Young; Jonathan Wong and Jan Komura, individually; Jose and Imelda Hurtado, individually; Jose and Lisa Mendez, individually; Jose Arreola Jr. and Paola Carreno, individually; Jose Olvera and Alma Valenciano, individually;</p>
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<p>1 Joseph and Drenda Pledger, individually; 2 Joseph Lynn and Elvira Lilly Barthelemy, 3 individually and Trustees of the Joseph Lynn 4 Barthelemy and Evira Lilly Barthelemy 2002 5 Family Trust; 6 Joseph and Kathleen Lasalle, individually; 7 Joseph and Michelle Harwell, individually; 8 Joseph and Nina Neulight, individually; 9 Joseph and Shirley Gholson, individually; 10 Joseph Lam; 11 Joseph Randall, Trustee of the Joseph 12 Darden Randall Revocable Trust; 13 Joseph Reeseigh; 14 Joseph Tooker; 15 Joshua and Jennifer Goldstein, individually; 16 Joshua Moreau; 17 Joyce and Frank Patota, individually; 18 Juan and Gloria Estrada, individually; 19 Juan and Maria Martinez, individually; 20 Judith Reichman and Harold Brown, 21 individually; 22 Julianne Bloomer and Philip Rabe, 23 individually; 24 Julie Centeno; 25 Julio Luna and Debbie Lun, individually; 26 June Sears, Trustee of the June Katherine 27 Sears Living Trust; 28 Jupeto Properties, LLC; Kac LLC; Karen L. Hanson and Lawrence S. Hanson, Trustees of the Hanson L.S. Revocable Living Trust; Karen Phipps, Trustee of the Phipps Family Trust; Karin Dron, Trustee of the Boyd S. Dron and Karin K. Dron Joint Living Trust; Karin L. James, Trustee of the James Family Trust; Karl and Beverley Mallette, individually; Katharine and John Broesamle, individually; Kathleen and Adam Morrison, individually; Kathleen and Thomas German, individually; Kathleen Bachelor; Kathleen Nolan, Trustee of the Kathleen Ann Nolan Revocable 2006 Family Trust; Kathryn Bartholomew, Trustee of the Kathryn Oconnor Bartholomew Living Trust;</p>	<p>Kathy Alderman; Katz Pincetl Orchard, LLC; Kay Dornbusch, Trustee of the The Dornbusch Family Living Trust; Keith and Anahid Jewett, individually; Keith and Robin Lawson, individually; Keith and Victoria Nightingale, individually; Kelley and John Dyer IV, individually; Kelvin Dodd and Deborah Gomez, individually; Kenett Niessen; Kenneth and Anne Boydston, individually; Kenneth and Brenda Whitteker, individually; Kenneth and Carol Fergeson, individually; Kenneth and Elizabeth Gruber, individually; Kenneth and Laura Brown, individually; Kenneth and Michael Ballard, individually; Kenneth and Sarah Van Dyke, individually; Kenneth Morgan; Kenneth Vadnais; Kern County; Kevin and Asli Ruf, individually; Kevin and Jennifer White, individually; Kevin and Joanne Olsland, individually; Kevin and Jodi Dunn, individually; Khaled A. Al-Awar and Sheryl L. Al-Awar, individually as Trustees of the K. and S. Al- Awar Family Trust; Kiki Lyon, Trustee of the Kiki Lyon Living Trust; Kim Hanna, Trustee of the Hanna Family Trust; Kristan Altimus; Kurt and Dayna Roggenstroh, individually; Kurt and Luisa Neher, individually; Kurt Patrick Zierhut and Stephanie Lee Zierhut, Co-Trustees of the Living Trust of Kurt Patrick Zierhut and Stephanie Lee Zierhut; Lanspring, LP; Larry and Joyce Heath, individually; Larry Davis; Larry Hubenthal, Trustee of the Larry Hubenthal Living Trust; Larry Neff, Trustee of the Larry Neff Trust; Las Encinas Mobile Home Park;</p>
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- 1 Laura B. Peck and Andrew D. Viles,
2 individually as Trustees of the William L.
3 and Laura B. Peck Trust - Marital Trust;
4 Laura Green, Trustee of the Green Survivors
5 Trust;
6 Laurie Johnson, Trustee of the Laurie A.
7 Johnson Living Trust;
8 Laurie Smith;
9 Lawrence and Sharon McMillan,
10 individually;
11 Lawrence I. and Patricia A. Hartmann,
12 individually as Trustees of the Larry and Pat
13 Hartmann Family Trust;
14 Lee and Janet Cassel, individually;
15 Lee Fitzgerald, Trustee of the Lee I
16 Fitzgerald 2007 Revocable Living Trust;
17 Lee Lebeck;
18 Lee Rosenbaum, Trustee of the Chief
19 Cornerstone Trust;
20 Leon and Caroline Pahle, individually;
21 Leonard Petitt and Kay Rolfe, individually;
22 Leslee and Terry Gustafson, individually;
23 Leslie McCleary;
24 Lester L. and Linda L. Barbee, individually
25 as Trustees of the Lester L. Barbee and
26 Linda L. Barbee Joint Revocable Living
27 Trust;
28 Liana Harp and Nathan Jones, individually;
Lilian Ruvalcaba;
Linda Chapman, Trustee Linda of the Jean
Chapman Living Trust;
Linda Griffin;
Linda McLaughlin, Trustee of the Linda
Landrieu McLaughlin Living Trust;
Linda Oliver, Trustee of the Linda A Oliver
2005 Revocable Living Trust;
Lipka Richard, Trustee of the Lorraine Trust;
Lisa Lopez and Brian Merrill, individually;
Lisa Smith and Nathaniel Cox, individually;
Lloyd Smith;
Logan and Misty Hagege, individually;
Logan and Tiffany Gould, individually;
Lois Stone Erburu, as Trustee of the
Surviving Spouse's Trust created in the
Robert and Lois Erburu Living Trust;
Lon and Margareta Kirkgaard, individually;
Longhorn Lane, LLC;
Lorene Cleary;
Lori Schloredt;
Lou and Barton Matthews, individually;
Louis and Irene Gutierrez, individually;
Louis Price;
Louise and Gary Culver, individually;
Louise Konstanzer, Trustee of the Ron and
Louise Konstanzer Family Trust;
Louise Tindle, Sole Trustee of the "Bypass
Trust" created under the Tindle Trust;
Luis Herrera and Kimberly Oyama,
individually;
Lupe Milner, Trustee of the Lupe Milner
Family Trust;
Lydia Jimenez;
Lyle and Cecilia Hallblom, individually;
Lyndon Hebenstreit;
Lynn Coleman;
Lynn Pike, Trustee of the Lynn 2016 Trust;
Lysiane Wallis;
M. Snyder;
Malcolm and Brenda Knight, individually;
Malcolm and Kelley McDowell,
individually;
Mandy Macaluso, Trustee of the Living
Trust of Mandy Macaluso;
Manuel Almeida and Kevin Bagley,
individually;
Marcus and Amy Hueppe, individually;
Marcus and Eva Kettles, individually;
Margaret M. Aldrich, Trustee of the Russell
F. Aldrich and Margaret M. Aldrich
"Decedent's Trust," and Trustee of the
Russell F. Aldrich and Margaret M. Aldrich
Living Trust;
Margo Kelly, Trustee of the Kelly Trust;
Maria Blasco;
Maria Collins;
Marie W. Wallace, Trustee of the Marie
Weismiller Wallace Separate Property Trust;
Marika Zoll;
Marilyn Sweeney, Trustee of the Marilyn
Sweeney Revocable Living Trust;
Mario and Shawn Reyes, individually;
Marion and Betty Earnest, individually;
Mark and Colleen Rusin, individually;
Mark and Connie Cline, individually;
Mark and Helen Moskovitz, individually;
Mark and Marcia Albertsen, individually;

1 Mark Bellini;
2 Mark W. Etchart, Trustee of the Mark W.
3 Etchart Separate Property Trust, and Trustee
4 of the Michel A. Etchart Separate Property
5 Trust;
6 Marsha MacDonald;
7 Marshall and Dina Murphy, individually;
8 Martha Fast, Trustee of the Martha L Fast
9 Living Trust;
10 Martha Laliberte;
11 Martha Moran;
12 Martin and Barbara Pops, individually;
13 Martin and Natalie Ehrlich, individually;
14 Martin and Patricia Henderson, individually;
15 Mary and Thomas Snow, individually;
16 Mary Downer, Trustee of the Arthur and
17 Mary Downer Family Trust;
18 Mary L. Vomund, Trustee of the Mary L.
19 Vomund 1987 Trust;
20 Mary Thomas, Trustee of The Thomas
21 Survivors Trust;
22 Mary Wingate, Trustee of the Mary Louise
23 Wingate Trust;
24 Mattawa and Rond Larue Clements,
25 individually;
26 Matthew and Judy Farmer, individually;
27 Matthew and Kimberly Hultgen,
28 individually;
Max Reed;
Maximiano and Norma Ortiz, individually;
J. McGlinchey;
McNell Creek Ranch, a general partnership;
McNell Properties, LLC;
Melesio Ramirez;
Melissa Van Sieten;
Merl and Kim Melstrand, individually;
Michael and Allison Sedlak, individually;
Michael and Annell La Barge, individually;
Michael and Barbara McCarthy,
individually;
Michael and Bernard Clark, individually;
Michael and Carol Jackson, individually;
Michael and Dianna Farrar, individually;
Michael and Heidi Bradbury, individually;
Michael and Kimberly Robertson,
individually;
Michael and Nancy Krumpschmidt,
individually;

Michael and Sharon Williams, individually;
Michael and Sonja Barrett, individually;
Michael and Terri Imwalle, individually;
Michael Chambliss;
Michael Hoover, Trustee of the Michael
Hoover Living Trust;
Michael Kelley;
Michael L. Delamore and Deborah Finley-
Delamore, individually as Trustees of the
Delamore Finley Family Trust;
Michael Lombardo, Trustee of the Michael
Lombardo Living Trust;
Michael Marietta, individually and as
Trustee of the Marietta Separate Property
Trust;
Michael Prentice;
Michael Purdy, Trustee of the Purdy Family
Revocable Trust;
Michael Saleh, Trustee of the Saleh and Lea
Saleh 1984 Family Trust;
Michael T. Marshall and Lisa Skyheart
Marshall, individually as Trustees of the
Marshall Living Trust;
Micky Froelich;
Miguel and Elvia Ramirez, individually;
Miguel Estrada;
Murelle Stevens, Trustee of the Stevens
Family Trust;
Nancy Ferrell, Trustee of the Nancy A.
Ferrell Family Trust;
Nancy Graham;
Nancy Jackson, Trustee of the Nancy J.
Jackson Living Trust;
Natalia Moore, Trustee of the Moore Family
Trust;
Nathan Allen;
Nathaniel and Suzette O'Grady,
individually;
Nathaniel Traudt and Karen Traudt,
individually and as Trustees of the Traudt
Family Trust;
Neil and Patricia Friedrichsen, individually;
Neil Kreitman, Trustee of the Neil Kreitman
Living Trust;
Nick and Morna Taminich, individually;
Nick Daily;
Nina Menconi;
Nye Ranch, LLC;

<p>1 Oak Haven, LLC; 2 Oak View Sanitary District; 3 Krishnamurti Foundation of America; 4 Oilfield Service and Truck Co.; 5 Oilfield Service and Truck, Inc.; 6 Ojai Assembly of God, Inc., dba Ojai's 7 Church of the Living Christ, Inc. 8 Ojai Home, LLC; 9 Ojai Unified School District; 10 Ojai Valley Athletic Club; 11 Ojai Valley Land Conservancy; 12 Ojai-Jackman, LLC; 13 Ole Behrendtsen; 14 Olga and Trent Jones, individually; 15 Orin Jr. and Karen Chappell, individually; 16 Orville Hernvall, Trustee of Hervnall Orville 17 and Marion Orville Trust; 18 Oscar and Mary Kaas, individually; 19 Oscar Acosta, Trustee of the Acosta Trust; 20 OST Trucks and Cranes; 21 Ovis, LLC; 22 Pamela Grau, Trustee of the Pamela Grau 23 Living Trust; 24 Pamela Melone, Trustee of the Pamela M. 25 Melone Living Trust; 26 Patricia Boan and Alina Hoffman, 27 individually; 28 Patricia Boan and John Hoffman, individually; Patricia Marshall, Trustee of the Patricia Ann Marshall Trust; Patricia McPherson; Patricia McGann; Patricia Unruhe and Andrew Jarvis, individually; Patrick Henderson and Jessica Maharry, Trustees of the Maharry Henderson Family Trust; Patrick Tumamait; Paul and Aldine Hennigan, individually; Paul and Janet Bailey, individually; Paul and June Clem, individually; Paul and Kim Robie, individually; Paul and Maelyn Ebert, individually; Paul and Sally Centeno, individually; Paul Fonteyn, individually; Paul Holahan and Julie Grist, individually; Paul Lepiane and Bo Bengtson, individually;</p>	<p>Paula Brown, Trustee of the Paula Jean Brown Trust; Paula Lasiter; Paula McCullough, Trustee of the Paula J. McCullough Living Trust; Pauline Mercado, Trustee of the Pauline Mercado Revocable Trust; Pedro Cisneros; Pedro Tepesano; Per and Inge Christiansen, individually; Perry Family, LLC; Peter and Linda Daprix, individually; Peter and Norma Dworkis, individually; Peter Dufau; Peter Passell; Peter Strauss and Rachel Ticotin, individually; Petrochem Development I, LLC; Philip and Darylyn Long, individually; Philip and Mary Pierpont, individually; Philip and Robert Pierpont, individually; Philippe and Betsy Caland, Trustees of the Philippe M. and Betsy C. Trust; Preparatory Villanova; Quint Morris; Rachel Kondor and Brian Segee, individually; Rafael and Magdalena Villalpando, individually; Raffi J. Mesrobian and Myrna R. Mesrobian, individually as Trustees of the Mesrobian Family Trust; Rainer Buschmann and John Johnston, individually; Ralph and Lynne Lundy, individually; Ramaa Mosley; Randal R. O'Connor, Successor Trustee of the Red Clay Trust, and Successor Trustee of the Le Cedre Trust; Ranjit Sevaprakasam; Ray Hall, Trustee-in-Trust of the 30 Acre Trust; Raymond and Esther Kardly, individually; Raymond and Eva Lyons, individually; Raymond Magee and Linda Taylor, individually; RDK Land, LLC; Rebecca Adams;</p>
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| <p>1 Red Mountain Land and Farming, LLC;
 2 Reeves Orchard, LLC;
 3 Refugio Gomez;
 4 Rex and Heidi Lanning, individually;
 5 Reynolds Fleming;
 6 Ricardo Gonzalez;
 7 Richard and Billie Sumner, individually;
 8 Richard and Emily Cargill, individually;
 9 Richard and Katherine Godfrey,
 10 individually;
 11 Richard and Lee Harper, individually;
 12 Richard and Marilyn Kallas;, individually
 13 Richard and Nancy Francis, individually;
 14 Richard and Teresa Turner, individually;
 15 Richard Dodson, Trustee of the Richard E.
 16 Dodson 2010 Revocable Trust;
 17 Richard Francis;
 18 Richard Frey and Wendy Appleby,
 19 individually;
 20 Richard and Emma Kline, individually;
 21 Richard Lowen;
 22 Richard Magana;
 23 Richard Mcgrath, Trustee of the Richard K
 24 McGrath Living Trust;
 25 Richard Sojka;
 26 RJPR Ltd. Partnership;
 27 Robert and Anamaria Schmid, individually;
 28 Robert and Antoinette Tivy, individually;
 Robert and Diana Petropulos, individually;
 Robert and Dianne Stone, individually;
 Robert and Dominique Daniels, individually;
 Robert and Dora Balitzer, individually;
 Robert and Emily Martin, individually;
 Robert and Gaea Cannaday, individually;
 Robert and Geraldine Hunsaker,
 individually;
 Robert and Jacqueline McDaniel,
 individually;
 Robert and Janice Hastie, individually;
 Robert and Marilyn Salas, individually;
 Robert and Maureen Young, individually;
 Robert and Sheila Ghen, individually;
 Robert and Sonia Rodarte, individually;
 Robert and Taundra Roddick, individually;
 Robert and Anna J. Auric, individually as
 Trustees of the Auric Anna J. Family Trust;
 Robert Calder Davis, Jr., Trustee of the
 Robert Davis Surviving Spouse's Trust,</p> | <p>Trustee of the Davis Family Bypass Trust
 and Trustee of the Davis Family Trust;
 Robert Dekkers;
 Robert Erickson and Ronald Wilson,
 individually;
 Robert Grasmere;
 Robert Polidori and Brittany Sanders,
 individually;
 Roberto and Maria Alonso, individually;
 Rocky Mann;
 Roderick and Joyce Greene, individually;
 Roger and Susan Dickens, individually;
 Roger Burke;
 Roger Haley; Trustee of the Roger and
 Christina Haley Survivors Trust;
 Roger Walker;
 Rogers-Cooper Memorial Foundation;
 Ronald and Bette Bluhm, individually;
 Ronald and Julia Bruns, individually;
 Ronald Blood and Linda Jordan,
 individually;
 Ronald E. Novak and Linda L. Lewis,
 individually as Trustees of the Novak Family
 Trust;
 Ronald K. Freeland and Doreen Freeland,
 individually as Trustees or their successors
 in interest of the Freeland Trust and any
 amendment;
 Ronald L.R. Hill and Debi R. Hill, Trustees
 of the R&D Hill Family Trust;
 Ronald Vogt;
 Rosemarie Singer;
 Rosemary Payne, Trustee of the Rosemary
 Payne Trust;
 Ross Anderson;
 Rowland A. Hill II and Brenda M. Hill,
 individually as Trustees of the Trust dated
 November 1, 2002;
 Roy Hicks, Trustee of the Roy and
 Jacquelyn Hicks Family Trust;
 Ruben and Marisa Martinez, individually;
 Ruben Chavez;
 Ruben Magana and Janette Lupercio,
 individually;
 Rudy Baez;
 Russel and Laura Alford, individually;
 Russell and Golden Wiley, individually;</p> |
|---|--|

<p>1 Russell Waldrop, Trustee of the Russell B. 2 Waldrop Living Trust; 3 Ryan and Lauren Nichols, individually; 4 Sabino and Nicki Perez, individually; 5 Sabrina Venskus, Trustee of the Sabrina 6 Venskus Living Trust; 7 Sally Crain; 8 Salvatore Scarpato; 9 Samuel and Joanna Schindel, individually; 10 Samuel Eaton; 11 Santa Ana Ranch, Inc.; 12 Sarah Young; 13 Saunie Krewson; 14 Scott and Brittany Denton, individually; 15 Scott and Carol Rasmussen, individually; 16 Scott and Keela Allison, individually; 17 Scott and Maria Hertzog, individually; 18 Scott and Michele Supan; 19 Scott Chasse, Trustee of the Scott Chasse 20 Revocable Living Trust; 21 Scott Forsyth and Joy Fedele, individually; 22 Scott Lundy, Trustee of the Scott Lundy 23 Trust; 24 Scott Luttenberger and Natasha Wilcox, 25 individually; 26 Scottie Monical; 27 Sean and Leslie Bennett, individually; 28 Serafin and Martha Flores, individually; Sevan Gerard; Shahram Shahrokhfar and Dina Nava, individually; Shanks Investment Group, LLC; Shawn Fulbright, Trustee of the Shawn Fulbright 2014 Revocable Trust; Shawn Reed; Shell Oil Co.; Sherrice and John Weeces, individually; Sherrie Daily; Sheryl Shushan; Shippee, LLC; Shull Bonsall, Jr., Trustee of the Shull Bonsall Family Trust; Evangeline Bonsall Smith, a married woman; Sidney and Jayne Rice, individually; Steven P. Smith and Lynn Davis-Smith, individually as Trustees of the Smith Revocable Living Trust;</p>	<p>Southern California Edison Co.; Southern California Associated Investors, Ltd.; Spencer and Bailey Hill, individually; SRPS, LP; Stacy Cadenasso; Stanley and Theresa Wyatt, individually; Stanley and W Hubbell, individually; State of California, Department of Transportation; Stefan Kozak and Ana Lopes, individually; Stephanie and Cheryl Beas, individually; Stephen Matzkin, Trustee of the Stephen Matzkin Trust; Stephen Turner, Trustee of the Stephen R. Turner Living Trust; Steven and Brent Kanaly, individually; Steven and Christine Vaughan, individually; Steven and Ka Rapholz, individually; Steven and Karen Erickson, individually; Steven and Krissell Dutter, individually; Steven Elliot Edelson, Trustee of the Los Angeles Entertainment Trust; Sumeet Bhatia and Michael McDonald, individually; Sumpuran Khalsa, Trustee of the Sumpuran S. Khalsa Living Trust; Suria and John Gottesman, individually; Susan Bee, Trustee of the John and Susan Bee Family Trust; Susan Conley, Trustee of the William and Susan Conley Family Trust; Susan Diller, Trustee of the Susan J Diller Trust; Susan Garand; Susan Gruber, individually and as Trustee of the Susan Gruber Living Trust; Susan McCord-Neufeld; Susan Moll; Susan Webster; Suzanne Harvey, individually and as Trustee of the Suzanne G. Harvey Revocable Trust; T Bone Holdings, LLC; Tanya Smith and Michael Montano, individually; Tanya Starceovich; Ted Robinson, Trustee of the Robinson Family Trust;</p>
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<p>1 Telos Development Ojai, LLC; 2 Terry Wilson, Trustee of the Terry Coultas 3 Wilson Living Trust; 4 The Ojai Rental, LLC; 5 The Roman Catholic Archbishop of Los 6 Angeles, a sole corporation; 7 Theodor and Lore Exner, individually; 8 Theresa Stark; 9 Thomas and Cynthia Carver, individually; 10 Thomas and Nanette Benbrook, individually; 11 Thomas and Jadona Collier Harper, 12 individually; 13 Thomas Jackson; 14 Thomas Tamplin and Michelle Wells, 15 individually; 16 Thomas Walbridge, Trustee of the Thomas C 17 Walbridge Trust; 18 Three Oaks, LLC; 19 Three Sisters Orchard, LP; 20 Timothy and Cheryl Austin, individually; 21 Timothy and Kathleen McHugh, 22 individually; 23 Timothy and Kathryn Moran, individually; 24 Timothy and Linda Turner, individually; 25 Timothy and Mary Williamson, individually; 26 Timothy Jones; 27 Todd and Christina McGinley, individually; 28 Todd Ryan and Jessica Click, individually; Todd Tullett, Trustee of the Todd Tullett Revocable Living Trust; Tom and Nancy Roland, individually; Tony and Heather Carlos, individually; Tracey and Melanie Boulton, individually; Trent and Kris Greco, individually; Tyler and Maria Barrell, individually; Tyler Labine and Carrie Ruscheinsky, individually; Uldine and Fabien Castel, individually; Uriel and Chieko Lopez, individually; US Natural Resources, Inc.; Vanlaw Investment Corp.; Ventura Land Trust; Ventura Unified School District; Vicente Guzman; Vicki Daw; Vicki L. Hollingsworth, Trustee of the Hollingsworth Trust;</p>	<p>Virginia M. McCarthy, Trustee of the Virginia M. McCarthy Living Trust; Virginia Siegfried, Trustee of the Virginia A. Siegfried Revocable Trust; Vivian Arber; Vivienne Moody; Walter and Evelyn Golis, individually; Walter and Linda Boysiewick, individually; Walter McGowan, Individually and as Trustee of the Walter Robert McGowan 1995 Trust; Wanda and Meniford Canterberry, individually; Watermark Carp II LLC; Wayne Tate and Janice Priebe-Tate, individually as Trustees of the Tate Trust, as community property; Weiss Investment Properties; Wendy and David Churchill, individually; Werner and Elva Fischer, individually; Wesley Scott and Kasey Perins, individually; West Crag Glen Smith, Successor Trustee of the Melissa Irene Elizabeth Smith Irrevocable Special Needs Trust - 1993; Willi and Stefanie U. Coeler, individually and as Trustees of the W. and S. Coeler Living Trust; William and Cynthia Anderson, individually; William and Jacqueline Boch, individually; William and Lorraine Walsh, individually; William and Melinda Welch, individually; William and Susan Luther, individually; William B. Hart, Jr., Trustee of the Constance Eaton Personal Residence Trust; William Bailey, Trustee of the William F. Bailey Living Trust; William Brothers, Trustee of the William C. Brothers Living Trust; William Erickson; William F. Newton and Charlotte R. Newton, individually as Trustees of the Newton Family Trust; William Gilbreth, Trustee of the William J. Gilbreth Trust; William Hawksworth; William Lowes; William L. Reynolds;</p>
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1 William White, Trustee of the William C.
2 White Trust;
3 William Whorf;
4 Wilmetta Davis;
5 Winfried and Carol Boersch, individually;
6 Wynn Johnson and Lisa Ayala Johnson,
7 individually;

Yan and Alili Comment, individually;
Yarrow and Caroline Cheney, individually;
Yitzhak and Smadar Orlans, individually;
Yvon and Malinda Chouinard, individually;
Zobeida Olson

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9
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12
13
14 Overlying Landowners

94. Pursuant to California Civil Procedure Code section 836(d)(1)(A), City will serve the owners all real property overlying the Watershed's Groundwater Basins ("Overlying Landowners") with this Third Amended Cross-Complaint and court-approved notice of adjudication and form answer. Pursuant to California Civil Procedure Code section 836(k), upon receipt of the requisite notice, Overlying Landowners interested in this proceeding shall have the duty to appear in this action and become a party if they so choose.

15
16
17
18
19
20
21
22 Roe Cross-Defendants

95. City is informed and believes that:

(a) Cross-Defendants Roes 1 through 50 operate wells and/or diversions which extract surface and/or subsurface water from the Ventura River.

(b) Cross-Defendants Roes 51 through 100 operate wells and/or diversions which extract surface and/or subsurface water from Matilija Creek.

(c) Cross-Defendants Roes 101 through 150 operate wells and/or diversions which extract surface and/or subsurface water from North Fork Matilija Creek.

(d) Cross-Defendants Roes 151 through 200 operate wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

(e) Cross-Defendants Roes 201 through 250 operate wells and/or diversions which extract surface and/or subsurface water from Coyote Creek.

(f) Cross-Defendants Roes 251 through 300 operate wells and/or diversions which extract surface and/or subsurface water from Cañada Larga Creek.

1 (g) Cross-Defendants Roes 301 through 350 operate wells and/or diversions
2 which extract surface and/or subsurface water from Santa Ana Creek.

3 (h) Cross-Defendants Roes 351 through 400 operate wells which extract water
4 from the Upper Ventura River Groundwater Basin.

5 (i) Cross-Defendants Roes 401 through 450 operate wells which extract water
6 from the Ojai Valley Groundwater Basin.

7 (j) Cross-Defendants Roes 451 through 500 operate wells which extract water
8 from the Lower Ventura River Groundwater Basin.

9 (k) Cross-Defendants Roes 501 through 550 operate wells which extract water
10 from the Upper Ojai Valley Groundwater Basin.

11 (l) Cross-Defendants Roes 551 through 1,000 are the owners, lessees, or other
12 persons or entities (i) holding or claiming to hold ownership or possessory interests in real
13 property within the boundaries of the Watershed; (ii) extracting water from the Watershed; (iii)
14 claiming some right, title, or interest to water located within the Watershed; or (iv) having or
15 asserting claims adverse to City's rights and claims.

16 96. City is unaware of the true names and capacities of Cross-Defendants Roes 1
17 through 1,000. When the City becomes aware of their true names and capacities, it will seek
18 leave of court to amend this Cross-Complaint accordingly.

19
20 BACKGROUND
21

22 97. The Watershed is located in western Ventura County, with a small section located
23 in eastern Santa Barbara County. The City is informed and believes that the Watershed is fan-
24 shaped and covers 226 square miles.

25 98. The Ventura River and its headwater tributary run through the center of the
26 Watershed along a 33.5 mile stretch from its headwaters in the Transverse Ranges to the Pacific
27 Ocean.
28

1 99. The Ventura River and its headwater tributary is fed by several major tributaries,
2 including Matilija Creek, North Fork Matilija Creek, San Antonio Creek, Cañada Larga Creek,
3 and Coyote Creek.

4 100. Lake Casitas is a man-made reservoir located in the Watershed primarily filled by
5 runoff from Coyote Creek and Santa Ana Creek and water diverted from the Ventura River.

6 101. The Ventura River consists of five distinct reaches starting upstream from the
7 Pacific Ocean: Reach 1 (Pacific Ocean to Ventura River Estuary), Reach 2 (Ventura River
8 Estuary to Foster Park), Reach 3 (Foster Park to the San Antonio Creek Confluence), Reach 4
9 (just above the Ventura River's confluence with San Antonio Creek to below the Robles
10 Diversion Facility), and Reach 5 (Robles Diversion Facility to confluence of Matilija Creek and
11 North Folk Matilija Creek).

12 102. There are four significant groundwater basins in the Watershed:

13 (a) Upper Ventura River Groundwater Basin (DWR Bulletin 118,
14 Groundwater Basin Number 4-3.01);

15 (b) Ojai Valley Groundwater Basin (DWR's Bulletin 118, Groundwater Basin
16 Number 4-2);

17 (c) Lower Ventura River Groundwater Basin (DWR's Bulletin 118,
18 Groundwater Basin Number 4-3.02); and

19 (d) Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118 Groundwater
20 Basin Number 4-1)

21 (collectively "Watershed's Groundwater Basins"). There is a hydrological connection between
22 the Ventura River and its tributaries and the Watershed's Groundwater Basins. Three maps of the
23 Watershed and the Watershed's Groundwater Basins are attached as **Exhibit A**.

24 103. In its First Amended Complaint and Verified Petition for Writ of Mandate
25 ("Complaint"), Plaintiff Santa Barbara Channelkeeper ("Channelkeeper") alleges that City's use
26 of the Ventura River water harms the steelhead trout and its critical habitat and exceeds water
27 quality standards. Channelkeeper also alleges City's use of water is unreasonable and violates the
28

1 public trust doctrine. Channelkeeper further alleges that City's water rights are subordinate to
2 upstream riparian and overlying groundwater rights in the Ventura River Watershed.

3 104. City is informed and believes that Cross-Defendants' use of water from the
4 Ventura River and the Watershed's Groundwater Basins reduces the surface and/or subsurface
5 water flow of the Ventura River.

6 105. City is informed and believes and thereon alleges that there are conflicting claims
7 of rights to the Watershed and/or its water.

8 106. City is informed and believes and thereon alleges that it has pueblo, prescriptive,
9 and/or appropriative rights to water in the Watershed. City is a successor to the Mission San
10 Buenaventura pueblo water right, which gives it a priority to use sufficient water from the
11 Ventura River Watershed to meet its needs. It has utilized water from the Watershed for more
12 than five years prior to the filing of this Cross-Complaint. It has used the Watershed and/or its
13 water for reasonable and beneficial purposes; and it has done so under a claim of right in an
14 actual, open, notorious, exclusive, continuous, uninterrupted, hostile, adverse use and/or manner
15 for a period of time of at least five years before filing this Cross-Complaint. City holds pre-1914
16 appropriative water rights.

17 107. Upon information and belief, each Cross-Defendant claims a right to utilize water
18 and threatens to increase its taking of water without regard to the City's rights. Cross-
19 Defendants' pumping and/or diversions reduces Watershed groundwater tables and surface flows
20 and contributes to the deficiency of the Watershed water supply as a whole.

21 108. Cross-Defendants' continued and increasing extraction and/or diversion of
22 Watershed waters has resulted in, and will result in a diminution, reduction, and impairment of
23 the Watershed's water supply.

24 109. Cross-Defendants' continued and increasing extraction and/or diversion of
25 Watershed waters has and will deprive the City of its rights to provide water for the public health,
26 welfare, and benefit.

FIRST CLAIM FOR RELIEF

(Cal. Const. art. X, § 2 - Against All Cross-Defendants)

110. City incorporates by reference the allegations of paragraphs 1 through 109.

111. Water resources in California must be put to reasonable and beneficial use, and parties exercising a right to use water must engage in a reasonable method of use and reasonable method of diversion.

112. City's reasonable and beneficial use of water requires consideration of Channelkeeper's claims and Cross-Defendants' uses and diversions of water from the Ventura River or the Watershed's Groundwater Basins.

113. City's reasonable and beneficial use of water also requires consideration of all other uses and users in the Watershed in the context of Statewide laws favoring domestic use of water; conservation of water; service of safe, clean, affordable, and accessible water; and protection of municipal water rights.

114. Based on those considerations, City's use of water from the Ventura River Watershed as compared to all other uses and users is reasonable and beneficial because:

(a) City's water is used for domestic purposes.

(b) City encourages conservation of water by its users, does not waste water in its operations, and only uses water for municipal purposes.

(c) City provides safe, clean, affordable, and accessible water.

(d) City is exercising vested water rights.

115. City seeks a preliminary and permanent injunction reducing Cross-Defendants' use of surface and/or subsurface water and groundwater affecting the surface and/or subsurface flow of the Ventura River to a level of reasonable and beneficial use and a level that protects public trust resources after a consideration of all water uses and users in the Watershed pursuant the Court of Appeal's decision in Santa Barbara Channelkeeper v. City of San Buenaventura (2018) 19 Cal.App.5th 1176, 1192–1193.

SECOND CLAIM FOR RELIEF

(Public Trust Doctrine - Against All Cross-Defendants)

116. City incorporates by reference the allegations of paragraphs 1 through 109.

117. The public trust doctrine protects the environmental values of rivers and streams in California for the benefit of the public, but is subject to parties reasonably exercising their water rights. Additionally, public trust doctrine uses are limited by the doctrine of reasonable and beneficial use.

118. Evaluating the City's reasonable and beneficial use of water requires consideration of all other uses and users in the Watershed.

119. Evaluating the City's reasonable and beneficial use of water also requires consideration of Water Code provisions and Statewide laws favoring domestic use of water; conservation of water; service of safe, clean, affordable, and accessible water; and protection of municipal water rights and the potential that non-flow related mitigation measures may reasonably reduce the quantity of water required to protect the environment and public trust resources.

120. Based on those considerations, City's use of water from the Ventura River and Lake Casitas is reasonable and beneficial because:

(a) City's water is used for domestic purposes.

(b) City encourages conservation of water by its users, does not waste water in its operations and only uses water for municipal purposes.

(c) City provides safe, clean, affordable and accessible water.

(d) City is exercising vested water rights.

121. City seeks a preliminary and permanent injunction reducing Cross-Defendants' use of surface and/or subsurface water and groundwater affecting the surface and/or subsurface flow of the Ventura River to a level of reasonable and beneficial use and a level that protects public trust resources after consideration of Channelkeeper's claims.

THIRD CLAIM FOR RELIEF

(Declaratory Relief - Pueblo and/or Treaty Water Rights -
Against All Cross-Defendants)

122. City incorporates by reference the allegations of paragraphs 1 through 109.

123. The City, or a portion of it, is located within the boundaries of the former Mission San Buenaventura. The designation of the Mission San Buenaventura and its subsequent secularization led to the creation of a pueblo water right. The City is a successor to the pueblo right which gives it a priority water right to use sufficient water from the Ventura River Watershed to meet its needs.

124. City is located on land that used to be part of Mexico. While that land was part of Mexico, a vested water right was established on it that was subsequently recognized by the United States in the Treaty of Guadalupe-Hidalgo. City is a successor to the Mexican water right, which has a priority over any right established under California law.

125. City contends that each Cross-Defendant's rights to utilize water from the Watershed are subordinate to City's pueblo and/or treaty water rights and to the general welfare of the citizens, inhabitants, and customers within City's jurisdiction.

126. An actual controversy has arisen between City and Cross-Defendants, and each of them. City alleges, on information and belief, that each Cross-Defendant disputes City's contentions, as described in the immediately preceding paragraph.

127. City seeks a judicial determination as to the correctness of its contentions and a finding as to the priority and amount of water it and each Cross-Defendant are entitled to utilize from the Watershed.

1 FOURTH CLAIM FOR RELIEF

2 (Declaratory Relief - Prescriptive Water Rights -
3 Against All Cross-Defendants)
4

5 128. City incorporates by reference the allegations of paragraphs 1 through 109.

6 129. The California Supreme Court has long recognized prescriptive water rights to
7 both surface and groundwater. City alleges that, for more than five years and before the date of
8 this Cross-Complaint, it has utilized water from the Watershed for reasonable and beneficial
9 purposes, and done so under a claim of right in an actual, open, notorious, exclusive, continuous,
10 hostile, and adverse manner. City further alleges that each Cross-Defendant had actual and/or
11 constructive notice of these activities, either of which is sufficient to establish City's prescriptive
12 rights.

13 130. City contends that each Cross-Defendant's rights to utilize water from the
14 Watershed are subordinate to City's prescriptive rights and to the general welfare of the citizens,
15 inhabitants, and customers within City's jurisdiction.

16 131. An actual controversy has arisen between City and Cross-Defendants, and each of
17 them. City alleges, on information and belief, that each Cross-Defendant disputes City's
18 contentions, as described in the immediately preceding paragraph.

19 132. City seeks a judicial determination as to the correctness of its contentions and a
20 finding as to the priority and amount of water it and each Cross-Defendant are entitled to utilize
21 from the Watershed.

22
23 FIFTH CLAIM FOR RELIEF

24 (Declaratory Relief - Appropriative Water Rights -
25 Against All Cross-Defendants)
26

27 133. City incorporates by reference the allegations of paragraphs 1 through 109.
28

134. City alleges that, alternatively or in addition to its prescriptive rights, it has priority pre-1914 appropriative rights to utilize water from the Watershed based upon extensive historic and beneficial use of local water in the Ventura River, including local water impounded and collected in Lake Casitas.

135. An actual controversy has arisen between City and Cross-Defendants, and each of them. City alleges, on information and belief, that all Cross-Defendants, and each of them, seek to prevent City from exercising its priority pre-1914 appropriative rights to utilize water from the Watershed.

136. City seeks a judicial determination of the rights of persons and/or entities with overlying, appropriative, and prescriptive rights to utilize water from the Watershed.

SIXTH CLAIM FOR RELIEF

(Cal. Civ. Proc Code §§ 830-852 - Comprehensive Adjudication
and Physical Solution - Against All Cross-Defendants)

137. City incorporates by reference the allegations of paragraphs 1 through 109.

138. The physical solution doctrine imposes a duty on this Court to resolve competing claims to water by cooperatively satisfying the reasonable and beneficial needs of each user while protecting the substantial enjoyment of their prior rights. A physical solution can achieve this result by: compelling non-flow related improvements for the protection of public trust resources thereby preserving and protecting water supply for domestic use, the highest and best use, and for irrigation use, the next highest and best use (Water Code section 106); augmenting the Watershed's water supply; and imposing other measures. The physical solution is a practical way of fulfilling the mandate of the California Constitution (article X, section 2) that the water resources of the State be put to use to the fullest extent of which they are capable.

139. Further, the Code of Civil Procedure authorizes the comprehensive adjudication of groundwater rights, including interconnected surface waters, and the imposition of physical solution. Cal. Civ. Proc. Code §§ 830-852.

140. Accordingly, City seeks a physical solution among City and Cross-Defendants regarding their respective uses of surface and/or subsurface water and groundwater affecting the Ventura River.

SEVENTH CLAIM FOR RELIEF

(Declaratory Relief - Municipal Priority - Against All Cross-Defendants)

141. City incorporates by reference the allegations of paragraphs 1 through 109.

142. City has the right to utilize water from the Watershed to meet existing public water needs and also to utilize increased amounts of water from the Watershed as necessary to meet future public needs. City's rights to the Watershed's water exist both as a result of the priority and extent of its pueblo, appropriative, and prescriptive rights, and as a matter of law and public policy of the State of California: "It is hereby declared to be the established policy of this State that the use of water for domestic purposes is the highest use of water and that the next highest use is for irrigation." Cal. Water Code § 106.

143. California Water Code Section 106.5 provides: "It is hereby declared to be the established policy of this State that the right of a municipality to acquire and hold rights to the use of water should be protected to the fullest extent necessary for existing and future uses. . . ."

144. Under California Water Code Sections 106 and 106.5, City has a prior and paramount right to Watershed water as against all non-municipal uses.

145. An actual controversy has arisen between City and Cross-Defendants. City alleges, on information and belief, that Cross-Defendants dispute the contentions contained in the preceding paragraphs of this Cross-Complaint. City is informed and believes, and on that basis alleges, that the certain Cross-Defendants utilize water from the Watershed for non-municipal purposes.

146. City seeks a judicial determination as to the correctness of its contentions and to the amount of water the parties may utilize from the Watershed. City also seeks a declaration of its right to utilize water from the Watershed to meet its reasonable present and future needs, and

1 that such rights are prior and paramount to the rights, if any, of Cross-Defendants to use
2 Watershed water for non-municipal purposes.

3
4 EIGHTH CLAIM FOR RELIEF

5 (Declaratory Relief - Human Right to Water - Against All Cross-Defendants)

6
7 147. City incorporates by reference the allegations of paragraphs 1 through 109.

8 148. City has the right to utilize water from the Watershed to meet existing public water
9 needs to protect the human right to water and also to utilize increased amounts of water from the
10 Watershed as necessary to meet future public needs to protect the human right to water. City's
11 rights to the Watershed's water exist both as a result of the priority and extent of its pueblo,
12 appropriative, and prescriptive rights, and as a matter of law and public policy of the State of
13 California: "It is hereby declared to be the established policy of the state that every human being
14 has the right to safe, clean, affordable, and accessible water adequate for human consumption,
15 cooking, and sanitary purposes." Cal. Water Code § 106.3.

16 149. Under California Water Code Section 106.3, City has a prior and paramount right
17 to Watershed water to protect the human right to water.

18 150. An actual controversy has arisen between City and Cross-Defendants. City
19 alleges, on information and belief, that Cross-Defendants dispute the contentions contained in the
20 preceding paragraphs of this Cross-Complaint. City is informed and believes, and on that basis
21 alleges, that the certain Cross-Defendants utilize water from the Watershed for purposes that are
22 inferior to the paramount human right to water.

23 151. City seeks a judicial determination as to the correctness of its contentions and to
24 the amount of water the parties may utilize from the Watershed to protect the human right to
25 water. City also seeks a declaration of its right to utilize water from the Watershed to meet its
26 reasonable present and future needs to protect the human right to water, and that such rights are
27 prior and paramount to the rights, if any, of Cross-Defendants to use Watershed water for
28 purposes that are inferior to the paramount human right to water.

NINTH CLAIM FOR RELIEF

(Declaratory Relief - Against All Cross-Defendants)

152. City incorporates by reference the allegations of paragraphs 1 through 109.

153. City contends, and is informed and believes that Cross-Defendants dispute, that:

(a) City's use of the Ventura River Watershed as compared to all other users and uses is reasonable and beneficial and does not violate the public trust doctrine.

(b) Cross-Defendants' uses are not reasonable or beneficial and violate the public trust doctrine as compared to City's use of the Ventura River Watershed.

154. Therefore, an actual, present controversy exists between City and Cross-Defendants concerning City's and Cross-Defendant's use of surface and/or subsurface water and groundwater affecting the Ventura River Watershed.

155. City seeks a declaration and judicial determination as to the validity of its contentions set forth in this Cross-Complaint.

PRAYER FOR RELIEF

WHEREFORE, City prays for the following relief:

1. For a preliminary and permanent injunction reducing Cross-Defendants' uses of surface water and groundwater affecting the surface and/or subsurface flow of the Ventura River to a level of reasonable and beneficial use and a level that protects public trust resources after consideration of all water uses and users in the Watershed;

2. For a physical solution allocating City's and Cross-Defendants' reasonable and beneficial use of water affecting the Ventura River Watershed, and protecting the substantial enjoyment of their water rights;

3. For judicial declarations consistent with City's contentions in the Third, Fourth, Fifth, Seventh, Eighth, and Ninth Claims for Relief in this Cross-Complaint;

4. For City's costs incurred in this action; and

1 5. For such other and further relief as the Court deems just and proper.

2
3 Dated: _____, 2019

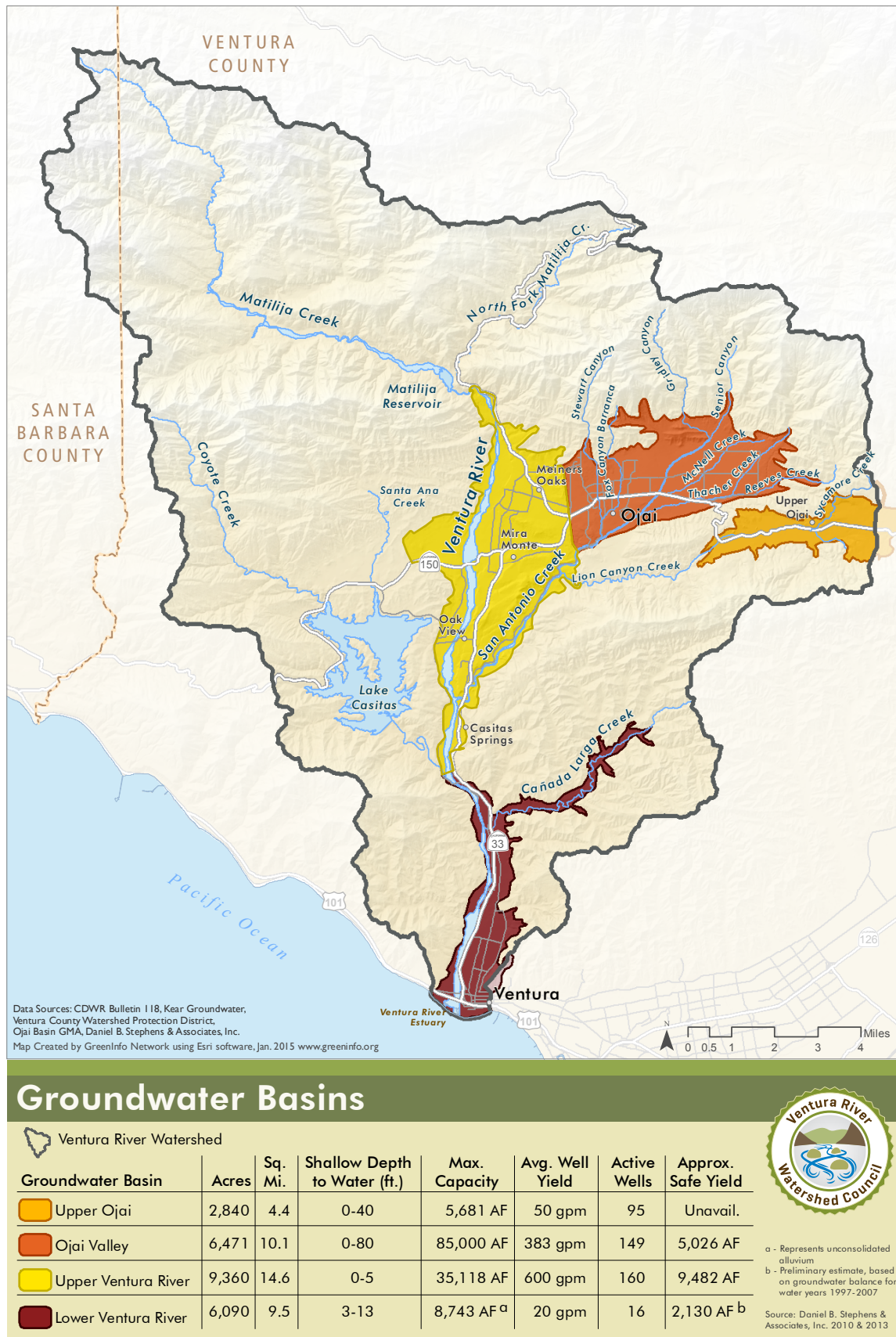
BEST BEST & KRIEGER LLP

4
5 By: _____

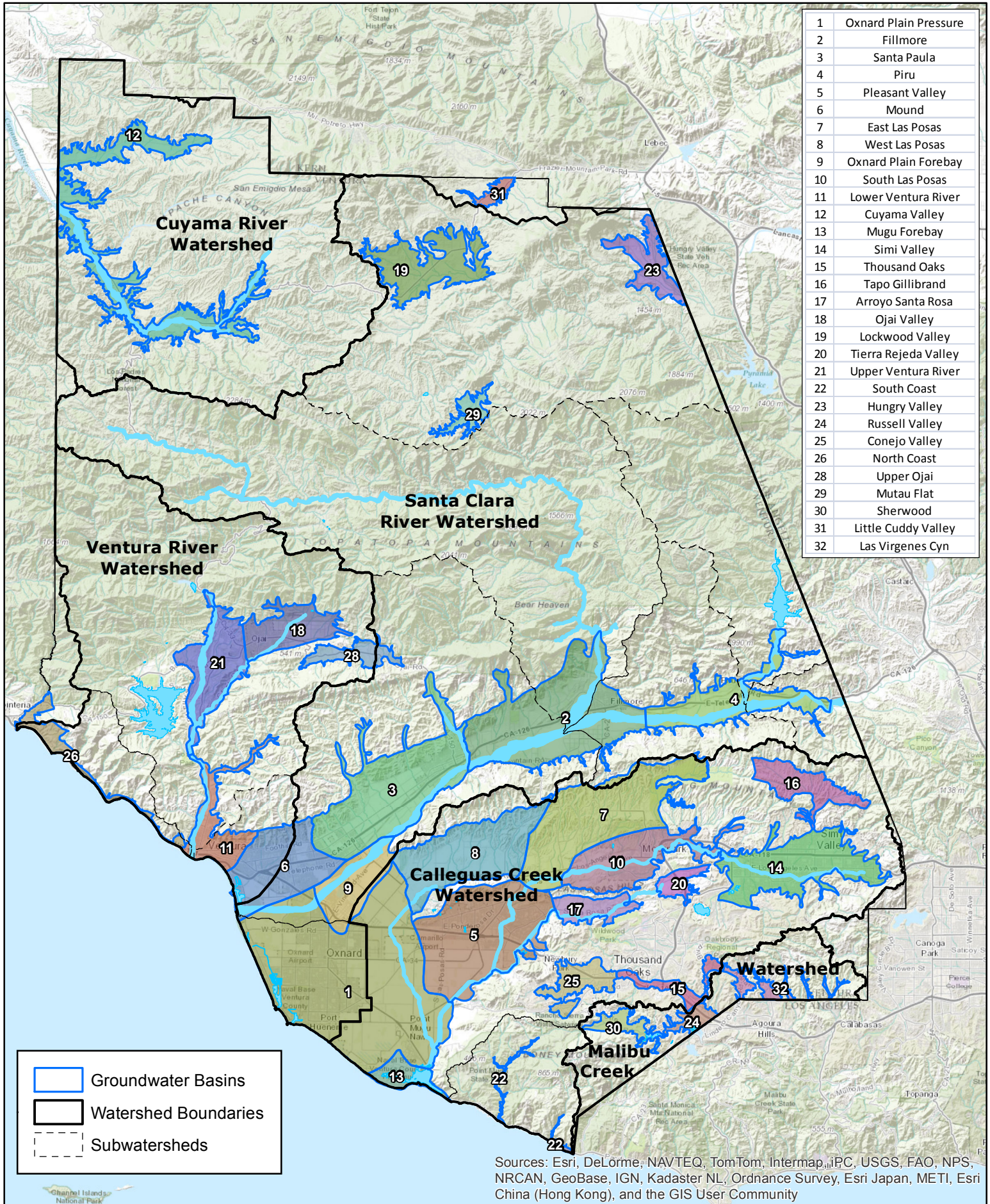
6 GENE TANAKA
7 SHAWN HAGERTY
8 SARAH CHRISTOPHER FOLEY
9 DAKOTAH BENJAMIN
10 Attorneys for Respondent and Cross-
11 Complainant CITY OF SAN
12 BUENAVENTURA

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LAW OFFICES OF
BEST BEST & KRIEGER LLP
2001 N. MAIN STREET, SUITE 390
WALNUT CREEK, CALIFORNIA 94596

EXHIBIT A

**Figure 3.3.3.2 Groundwater Basins Map**

Data sources: See Table 3.4.2.1.3 Groundwater Basins Map Data Sources in "3.4.2 Water Supplies" for an explanation of the various data in the table.



Ventura County
Resource Management Agency
Information Systems Department
Map created on 04/07/2014



Figure 3-8
Groundwater Basins
WCVC IRWM Region

0 2 4 8 Miles

Disclaimer: this map was created by the Ventura County Resource Management Agency, Mapping Services - GIS, which is designed and operated solely for the convenience of the County and related public agencies. The County does not warrant the accuracy of this map and no decision involving a risk of economic loss or physical injury should be made in reliance therein.





Figure 3.3.1.1.1 Drainage Network Map

EXHIBIT B

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9 Tel.: 619.525.1300; Fax: 619.233.6118

10 Attorneys for Respondent and Cross-Complainant
11 CITY OF SAN BUENAVENTURA

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES

14 SANTA BARBARA CHANNELKEEPER,
15 a California non-profit corporation,

16 Petitioner,

17 v.

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

22 Respondents.

23 CITY OF SAN BUENAVENTURA, a
24 California municipal corporation,

25 Cross-Complainant

26 v.

27 DUNCAN ABBOTT, an individual, et al.

28 Cross-Defendants.

Case No. 19STCP01176
Judge: Honorable William F. Highberger

NOTICE OF COMMENCEMENT OF
GROUNDWATER BASIN AND
WATERSHED ADJUDICATION

CMC:
Time:
Dept: 10

Action Filed: Sept. 19, 2014
FAC Filed: Sept. 7, 2018
Trial Date: Not Set

NOTICE OF COMMENCEMENT OF GROUNDWATER BASIN ADJUDICATION

THIS NOTICE IS IMPORTANT. ANY RIGHTS YOU CLAIM TO PUMP OR STORE GROUNDWATER FROM THE BASINS IDENTIFIED IN THIS NOTICE MAY BE AFFECTED BY A LAWSUIT INITIATED BY THE THIRD AMENDED CROSS-COMPLAINT SUMMARIZED BELOW.

Failing to participate in this lawsuit could have a significant adverse effect on any right to pump or store groundwater that you may have. You may seek the advice of an attorney in relation to this lawsuit. Such attorney should be consulted promptly. A case management conference (“CMC”) in this groundwater basin adjudication proceeding is currently scheduled to occur on the date specified on the cover page of this notice. If you intend to participate in the groundwater adjudication proceeding to which this notice applies, you are advised to attend the next case management conference in person or have an attorney represent you at the next case management conference.

1 Participation requires the production of all information regarding your
2 groundwater use. You must provide this information within six months of
3 appearing in the comprehensive adjudication, unless otherwise stipulated by the
4 parties or ordered by the Court pursuant to Code of Civil Procedure section 842.
5

6 A form answer is provided for your convenience. You may fill out the form
7 answer and file it with the court. Should you choose to file the form answer, it will
8 serve as an answer to all complaints and cross-complaints filed in this case.
9

10 The following information is provided pursuant to Code of Civil
11 Procedure section 836(a)(1)(B):
12

13 (i) Names of Basins:

- 14 a. Upper Ventura River Groundwater Basin (Department of Water
15 Resources' ("DWR") Bulletin 118 Groundwater Basin Number
16 4-3.01);
17 b. Ojai Valley Groundwater Basin (DWR's Bulletin 118
18 Groundwater Basin Number 4-2);
19 c. Lower Ventura River Groundwater Basin (DWR's Bulletin 118
20 Groundwater Basin Number 4-3.02); and
21 d. Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118
22 Groundwater Basin Number 4-1)
23 (collectively "Ventura River Watershed Groundwater Basins").
24

25 A map of each of the Ventura River Watershed Groundwater Basins is
26 available at <https://gis.water.ca.gov/app/bbat/>.
27
28

1 (ii) Case No. 19STCP01176, Los Angeles County Superior Court,
2 Complex Civil Litigation Division, Department No. 010, Judge William F.
3 Highberger presiding, located at 312 North Spring Street, Los Angeles,
4 California 90012.

5
6 (iii) Cross-Complainant's counsel may be contacted at the following
7 mailing address, telephone number, and email address:

8
9 Dakotah Benjamin
Best Best & Krieger LLP
2001 N. Main Street, Suite 390
10 Walnut Creek, California 94596
Telephone: 925.977.3330
11 dakotah.benjamin@bbklaw.com

12
13 (iv) The Third Amended Cross-Complaint initiating this action for a
14 comprehensive adjudication of the Ventura River Watershed including the Ventura
15 River Watershed Groundwater Basins alleges nine claims for relief: (1)
16 preliminary and permanent injunction reducing Cross-Defendants' use of surface
17 and/or subsurface water and groundwater affecting the surface and/or subsurface
18 flow of the Ventura River to a level of reasonable and beneficial use under
19 California Constitution Article X, Section 2; (2) preliminary and permanent
20 injunction reducing Cross-Defendants' use of surface and/or subsurface water and
21 groundwater affecting the surface and/or subsurface flow of the Ventura River to a
22 level of reasonable and beneficial use and a level that protects public trust
23 resources under the public trust doctrine; (3) declaratory relief for pueblo and/or
24 treaty water rights; (4) declaratory relief for prescriptive water rights; (5)
25 declaratory relief for appropriative water rights; (6) comprehensive adjudication
26 and physical solution; (7) declaratory relief for municipal priority; (8) declaratory
27 relief for the human right to water; and (9) declaratory relief regarding the Cross-
28 Complainant's use of surface and/or subsurface water and groundwater affecting

1 the Ventura River Watershed and declaratory relief that Cross-Defendants' water
2 uses are not reasonable or beneficial and violate the public trust doctrine. This
3 Third Amended Cross-Complaint includes claims regarding the groundwater uses
4 in the Ventura River Watershed Groundwater Basins. The Third Amended Cross-
5 Complaint also includes claims regarding surface water uses from the Ventura
6 River and its tributaries, which may be governed by future court orders.

7
8 (v) Date by which persons receiving this notice must appear in
9 comprehensive adjudication: Pursuant to Judge Highberger's Order, within sixty
10 (60) days of receipt of this notice and accompanying form answer, either by filing
11 the attached form answer or other appearance authorized by law.

12
13 (vi) Filing and Service of Court Documents. Filing in this case must be
14 done in one of three ways at the Stanley Mosk Courthouse, located at 111 North
15 Hill Street, Los Angeles, CA 90012,
16 <http://www.lacourt.org/courthouse/info/address/la>.

- 17 a. Deliver in person to: Stanley Mosk Courthouse, Complex Civil
18 Filing Window, First Floor, Room 102, between the hours of
19 8:30 a.m. and 4:30 p.m., Monday through Friday, except for
20 Court Holidays;
21 b. Mail to: Stanley Mosk Courthouse, 111 North Hill Street, Los
22 Angeles, CA 90012; or
23 c. Fax filing: Stanley Mosk Courthouse, General Jurisdiction-
24 Complex (Room 102), Facsimile Telephone Number: (442) 247-
25 3769

26 All service shall be made by electronic service through the provider File &
27 ServeXpress. To register, visit their website,
28

1 <https://os.fileandservexpress.com/web/ui/welcomepage.aspx>, or call 1-888-529-
2 7587.

3
4 (vii) Court fees. A first appearance fee of \$435 will be required for all
5 newly appearing cross-defendants, subject to any applicable waiver. No additional
6 complex fees are required in accordance with California Government Code section
7 70616.

8
9 (viii) Public Meetings. The City of San Buenaventura will hold two public
10 community meetings to explain the proceedings in this comprehensive adjudication
11 of the Ventura River Watershed. The meetings shall take place on:

12 Tuesday, December 10, 2019, 6:00 to 8:00 p.m.
13 Oak View Community Center, Kunkle Room
14 18 Valley Road
Oak View, CA 93022

15 Wednesday, December 18, 2019, 6:00 to 8:00 p.m.
16 Bell Arts Factory, Community Room
432 N. Ventura Ave
Ventura, CA 93001

17
18 Dated: _____, 2019

BEST BEST & KRIEGER LLP

19
20 By:

21 GENE TANAKA
22 SHAWN HAGERTY
23 SARAH CHRISTOPHER FOLEY
24 DAKOTAH BENJAMIN
25 Attorneys for Respondent and Cross-
26 Complainant CITY OF SAN
27 BUENAVENTURA
28

EXHIBIT C

1 GENE TANAKA, Barra No. 101423
gene.tanaka@bbklaw.com
2 SARAH CHRISTOPHER FOLEY, Nro. del Colegio de Abogados 277223
sarah.foley@bbklaw.com
3 DAKOTAH BENJAMIN, Nro. del Colegio de Abogados 316446
dakotah.benjamin@bbklaw.com
4 BEST BEST & KRIEGER LLP
2001 N. Main Street, Suite 390
5 Walnut Creek, California 94596
Tel.: 925.977.3300; Fax: 925.977.1870
6
7 SHAWN HAGERTY, Nro. del Colegio de Abogados 182435
shawn.hagerty@bbklaw.com
8 BEST BEST & KRIEGER LLP
655 West Broadway, Piso 15vo.
San Diego, California 92101
9 Tel.: 619.525.1300; Fax: 619.233.6118

10 Abogados de la Parte Demandada y Contrademandante
11 CIUDAD DE SAN BUENAVENTURA

12 TRIBUNAL SUPERIOR DEL ESTADO DE CALIFORNIA

13 CONDADO DE LOS ANGELES

14 SANTA BARBARA CHANNELKEEPER,
15 una corporación no lucrativa de California

16 Solicitante,

17 v.

18 JUNTA ESTATAL DE CONTROL DE
19 RECURSOS HÍDRICOS, una dependencia
estatal de California;
20 CIUDAD DE SAN BUENAVENTURA,
una corporación municipal de California,
21 nombrada de manera incorrecta como
CIUDAD DE BUENAVENTURA,

22 Demandados.

23 CIUDAD DE SAN BUENAVENTURA,
24 una corporación municipal de California,

25 Contrademandante

26 v.

26 DUNCAN ABBOTT, un individuo et al.

27 Contrademandados.

Caso No. 19STCP01176
Juez: Honorable William F. Highberger

AVISO DE INICIO DE ADJUDICACIÓN DE
CUENCAS Y CUENCAS SUBTERRÁNEAS

CMC:
Hora:
Dept: 10

Acción presentada: 19 de septiembre de 2014
FAC Presentada: 7 de septiembre de 2018
Fecha del juicio: Por definir

1 **AVISO DE INICIO DE ADJUDICACIÓN DE**
2 **CUENCA SUBTERRÁNEA**
3

4 ESTE AVISO ES IMPORTANTE. TODO DERECHO QUE USTED
5 RECLAME PARA BOMBLEAR O ALMACENAR AGUA SUBTERRÁNEA DE
6 LAS CUENCAS IDENTIFICADAS EN ESTE AVISO PUEDE SER AFECTADO
7 POR UNA DEMANDA INICIADA POR LA TERCERA CONTRADEMANDA
8 MODIFICADA QUE SE RESUME A CONTINUACIÓN.

9
10 Se puede obtener copia de la Tercera Contrademanda Modificada contactando
11 al abogado del Contrademandante identificado en este aviso. Si usted reclama
12 derechos para bombear o almacenar agua subterránea dentro de las cuencas
13 identificadas aquí, ya sea ahora o en un futuro, usted puede pasar a ser parte de esta
14 demanda al presentar una respuesta a la demanda en o antes de la fecha límite
15 especificada en este aviso. Usted puede presentar una respuesta completando el
16 formulario de respuesta adjunto, presentándolo ante el juzgado indicado en este aviso y
17 enviando copia al abogado del Contrademandante identificado abajo en este aviso.

18
19 El no participar en esta demanda podría tener un efecto adverso importante
20 sobre los derechos a bombear o almacenar agua subterránea que usted pudiera tener.
21 Usted puede buscar asesoría legal al respecto. En dado caso deberá hacerlo de
22 manera expedita. Una conferencia de administración de casos (“CMC”) en este
23 procedimiento de adjudicación de cuenca de aguas subterráneas está actualmente
24 programada para la fecha especificada en la portada de este aviso. Si tiene la
25 intención de participar en el procedimiento de adjudicación de agua subterránea
26 aplicable a este aviso, se le sugiere asistir personalmente a la próxima conferencia de
27 manejo de caso, o estar representado por un abogado en la próxima conferencia de
28 manejo de casos.

1 La participación requiere presentar toda la información relacionada con el
2 uso de agua subterránea. Usted deberá proporcionarla en un plazo de seis meses
3 a partir de la fecha en que aparezca en la adjudicación integral, salvo que las
4 partes estipulen lo contrario o que el Tribunal lo haya ordenado de conformidad
5 con la sección 842 del Código de Procedimiento Civil.

6
7 Para su conveniencia, se proporcionará un formulario de respuesta. Usted
8 puede llenarlo y presentarlo ante el tribunal. Si así lo decide, servirá como
9 respuesta a todas las demandas y contrademandas relativas a este caso.

10
11 Se proporciona la siguiente información de conformidad con el Código de
12 Procedimientos Civiles sección 836(a)(1)(B):

13 (i) Nombres de las Cuencas:

- 14 a. Cuenca subterránea superior del Río Ventura (Boletín 118
15 Cuenca subterránea Número 4-3.01 del Departamento de
16 Recursos Hídricos “DWR”);
17 b. Cuenca subterránea del Valle de Ojai (Boletín 118 Cuenca
18 Subterránea Número 4-2 del DWR);
19 c. Cuenca subterránea inferior del Río Ventura (Boletín 118
20 Cuenca subterránea Número 4-3.02 del DWR); y
21 d. Cuenca subterránea superior del Valle de Ojai (Boletín 118
22 Cuenca subterránea Número 4-1 del DWR)
23 (colectivamente “Cuencas subterráneas de la Cuenca del Río Ventura”).

24
25 Un mapa de cada una de las Cuenca Subterráneas de la Cuenca del Río Ventura está
26 a su disposición en <https://gis.water.ca.gov/app/bbat/>.

1 (ii) Caso No. 19STCP01176, Tribunal Superior del Condado de Los
2 Ángeles, División de Litigios Civiles Complejos, Departamento No. 010,
3 presidiendo el Juez William F. Highberger, ubicado en el 312 de North Spring,
4 en Los Ángeles, California 90012.

5
6 (iii) El abogado del Contrademandante puede ser contactado en la siguiente
7 dirección, número de teléfono, y correo electrónico:

8
9 Dakotah Benjamin
Best Best & Krieger LLP
2001 N. Main Street, Suite 390
10 Walnut Creek, California 94596
11 Teléfono: 925.977.3330
dakotah.benjamin@bbklaw.com

12
13 (iv) La Tercera Contrademanda Modificada que inicia esta acción para una
14 adjudicación integral de la Cuenca del Río Ventura, incluyendo las Cuencas
15 Subterráneas de la Cuenca del Río Ventura, alega nueve reclamaciones de
16 indemnización: (1) orden judicial preliminar y permanente que reduce el uso, por
17 parte de los Contrademandados, del agua superficial y/o subsuperficial y del agua
18 subterránea que afecta el flujo superficial y/o subsuperficial del Río Ventura a un
19 nivel de uso razonable y benéfico de acuerdo con el Artículo X, Sección 2 de la
20 Constitución de California; (2) orden judicial preliminar y permanente que reduce
21 el uso, por parte de los Contrademandados, del agua superficial y/o subsuperficial
22 y del agua subterránea que afecta el flujo superficial y/o subsuperficial del Río
23 Ventura a un nivel de uso razonable y benéfico y a un nivel que proteja los
24 recursos del fideicomiso público de acuerdo con la doctrina del fideicomiso
25 público; (3) medidas declaratorias para los derechos de agua de los pueblos y/o
26 tratados; (4) medidas declaratorias para los derechos de agua prescriptivos; (5)
27 medidas declaratorias para los derechos de agua apropiados; (6) adjudicación
28 integral y solución física; (7) medidas declaratorias para prioridad municipal; (8)

medidas declaratorias para el derecho humano al agua; y (9) medidas declaratorias con respecto al uso, por la parte Contrademandante, del agua superficial y/o subsuperficial y del agua subterránea que afecta la Cuenca del Río Ventura y una medida declaratoria de que los usos del agua, por la parte Contrademandada, no son razonables ni benéficos y violan la doctrina del fideicomiso público. Esta Tercera Contrademanda Modificada incluye reclamos relacionados con los usos del agua subterránea en las Cuencas Subterráneas de la Cuenca del Río Ventura. La Tercera Contrademanda Modificada también incluye reclamos relacionados por los usos de aguas superficiales del Río Ventura y sus afluentes, los cuales pueden ser regulados por futuras órdenes judiciales.

(v) Fecha límite para que las personas que reciben este aviso deban aparecer en la adjudicación integral: De conformidad con la Orden del Juez Highberger, deberá ser dentro de los sesenta (60) días siguientes a la recepción de esta notificación y formulario de respuesta que lo acompaña, sea al presentar el formulario de respuesta adjunto u otra comparecencia autorizada por la ley.

(vi) Presentación y notificación de los documentos de la Corte. La presentación de la demanda en este caso debe hacerse en una de las siguientes tres modalidades ante el Juzgado Stanley Mosk, ubicado en 111 de la calle North Hill, en Los Ángeles, CA 90012, <http://www.lacourt.org/courthouse/info/address/la>.

- a. En persona en: Juzgado de Stanley Mosk, Ventana de Archivo Civil Complejo, Primer Piso, Cuarto 102, de las 8:30 a.m. a las 4:30 p.m., lunes a viernes, excepto en vacaciones de la Corte;
- b. Por correo postal a: Juzgado de Stanley Mosk, 111 de la calle North Hill, Los Angeles, CA 90012; o

c. Presentación por Fax: Juzgado de Stanley Mosk, Complejo de
Jurisdicción General (Cuarto 102), Número de teléfono para
Facsimile: (442) 247-3769

Todos los servicios se deberán llevar a cabo por vía electrónica a través del
proveedor File & ServeXpress. Para registrarse, visite su sitio web,
<https://os.fileandservexpress.com/web/ui/welcomepage.aspx>, o llame al 1-888-529-
7587.

(vii) Honorarios judiciales. Se requerirá una cuota por primera
comparecencia de \$435 a todos los Contrademandados que aparezcan por primera
vez, sujeta a cualquier dispensa aplicable. No se requieren cargos compuestos
adicionales de acuerdo con la sección 70616 del Código de Gobierno de California.

(viii) Reuniones públicas. La ciudad de San Buenaventura llevará a cabo
dos reuniones públicas para explicar los procedimientos en esta adjudicación
integral de la vertiente de agua del río Ventura. Las reuniones habrán de tener
lugar:

10 de Diciembre de 2019, 6:00 p.m. a 8:00 p.m.
Centro Comunitario Oak View, Habitación Kunkle
18 Valley Road.
Ciudad de Oak View, CA 93022

18 de Diciembre de 2019, 6:00 p.m. a 8:00 p.m.
Centro Comunitario de Bells Arts Factory
432 N. Ventura Avenue
Ciudad de Ventura, CA 93001

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Fechado: _____, 2019

BEST BEST & KRIEGER LLP

Por: _____

GENE TANAKA
SHAWN HAGERTY
SARAH CHRISTOPHER FOLEY
DAKOTAH BENJAMIN
Abogados de la Parte Demandada y
Contrademandante CIUDAD DE
SAN BUENAVENTURA

EXHIBIT D

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER,
a California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES
CONTROL BOARD, a California State
Agency; et al.,

Respondents.

CITY OF SAN BUENAVENTURA, a
California municipal corporation,

Cross-Complainant,

v.

DUNCAN ABBOTT, an individual; et al.

Cross-Defendants.

Case No. 19STCP01176
Judge: Honorable William F. Highberger

[PROPOSED] ORDER GRANTING
RESPONDENT AND CROSS-
COMPLAINANT CITY OF SAN
BUENAVENTURA'S MOTION FOR
APPROVAL OF NOTICE AND FORM
ANSWER

Date: November 1, 2019
Time: 1:30 p.m.
Dept.: 10

Action Filed: September 19, 2014
Trial Date: Not Set

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After consideration of the papers filed in connection with the Motion and arguments of counsel, IT IS HEREBY ORDERED:

- 82470.00018\32405243.1

- 1 a. Deliver in person to: Stanley Mosk Courthouse, Complex Civil Filing
2 Window, First Floor, Room 102, between the hours of 8:30 a.m. and 4:30
3 p.m., Monday through Friday, except for Court Holidays;
4
5 b. Mail to: Stanley Mosk Courthouse, 111 North Hill Street, Los Angeles, CA
6 90012; or
7
8 c. Fax filing: Stanley Mosk Courthouse, General Jurisdiction-Complex
9 (Room 102), Facsimile Telephone Number: (442) 247-3769.
10

11 6. All service shall be made by electronic service through the provider File &
12 ServeXpress. To register, visit their website,
13 <https://os.fileandservexpress.com/web/ui/welcomepage.aspx>, or call 1-888-529-
14 7587.
15

16 7. A first appearance fee of \$435 will be required for all newly appearing cross-
17 defendants, subject to any applicable waiver.
18

19 8. No additional complex fees are required in accordance with California
20 Government Code section 70616.
21
22

23 Dated: _____

23 By: _____
24 The Honorable William F. Highberger
25 Judge of the Superior Court
26 County of Los Angeles
27
28

EXHIBIT A

1 GENE TANAKA, Bar No. 101423
gene.tanaka@bbklaw.com
2 SARAH CHRISTOPHER FOLEY, Bar No. 277223
sarah.foley@bbklaw.com
3 DAKOTAH BENJAMIN, Bar No. 316446
dakotah.benjamin@bbklaw.com
4 Best Best & Krieger LLP
2001 N. Main Street, Suite 390
5 Walnut Creek, California 94596
Tel.: 925.977.3300; Fax: 925.977.1870
6
7 SHAWN HAGERTY, Bar No. 182435
shawn.hagerty@bbklaw.com
Best Best & Krieger LLP
8 655 West Broadway, 15th Floor
San Diego, California 92101
9 Tel.: 619.525.1300; Fax: 619.233.6118

10 Attorneys for Respondent and Cross-Complainant
11 CITY OF SAN BUENAVENTURA

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES

14 SANTA BARBARA CHANNELKEEPER,
15 a California non-profit corporation,

16 Petitioner,

17 v.

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

22 Respondents.

23 CITY OF SAN BUENAVENTURA, a
24 California municipal corporation,

25 Cross-Complainant

26 v.

27 DUNCAN ABBOTT, an individual, et al.

28 Cross-Defendants.

Case No. 19STCP01176
Judge: Honorable William F. Highberger

NOTICE OF COMMENCEMENT OF
GROUNDWATER BASIN AND
WATERSHED ADJUDICATION

CMC:
Time:
Dept: 10

Action Filed: Sept. 19, 2014
FAC Filed: Sept. 7, 2018
Trial Date: Not Set

NOTICE OF COMMENCEMENT OF GROUNDWATER BASIN ADJUDICATION

THIS NOTICE IS IMPORTANT. ANY RIGHTS YOU CLAIM TO PUMP OR STORE GROUNDWATER FROM THE BASINS IDENTIFIED IN THIS NOTICE MAY BE AFFECTED BY A LAWSUIT INITIATED BY THE THIRD AMENDED CROSS-COMPLAINT SUMMARIZED BELOW.

Failing to participate in this lawsuit could have a significant adverse effect on any right to pump or store groundwater that you may have. You may seek the advice of an attorney in relation to this lawsuit. Such attorney should be consulted promptly. A case management conference (“CMC”) in this groundwater basin adjudication proceeding is currently scheduled to occur on the date specified on the cover page of this notice. If you intend to participate in the groundwater adjudication proceeding to which this notice applies, you are advised to attend the next case management conference in person or have an attorney represent you at the next case management conference.

1 Participation requires the production of all information regarding your
2 groundwater use. You must provide this information within six months of
3 appearing in the comprehensive adjudication, unless otherwise stipulated by the
4 parties or ordered by the Court pursuant to Code of Civil Procedure section 842.
5

6 A form answer is provided for your convenience. You may fill out the form
7 answer and file it with the court. Should you choose to file the form answer, it will
8 serve as an answer to all complaints and cross-complaints filed in this case.
9

10 The following information is provided pursuant to Code of Civil
11 Procedure section 836(a)(1)(B):
12

13 (i) Names of Basins:

- 14 a. Upper Ventura River Groundwater Basin (Department of Water
15 Resources' ("DWR") Bulletin 118 Groundwater Basin Number
16 4-3.01);
17 b. Ojai Valley Groundwater Basin (DWR's Bulletin 118
18 Groundwater Basin Number 4-2);
19 c. Lower Ventura River Groundwater Basin (DWR's Bulletin 118
20 Groundwater Basin Number 4-3.02); and
21 d. Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118
22 Groundwater Basin Number 4-1)
23 (collectively "Ventura River Watershed Groundwater Basins").
24

25 A map of each of the Ventura River Watershed Groundwater Basins is
26 available at <https://gis.water.ca.gov/app/bbat/>.
27
28

1 (ii) Case No. 19STCP01176, Los Angeles County Superior Court,
2 Complex Civil Litigation Division, Department No. 010, Judge William F.
3 Highberger presiding, located at 312 North Spring Street, Los Angeles,
4 California 90012.

5
6 (iii) Cross-Complainant's counsel may be contacted at the following
7 mailing address, telephone number, and email address:

8
9 Dakotah Benjamin
Best Best & Krieger LLP
2001 N. Main Street, Suite 390
10 Walnut Creek, California 94596
Telephone: 925.977.3330
11 dakotah.benjamin@bbklaw.com

12
13 (iv) The Third Amended Cross-Complaint initiating this action for a
14 comprehensive adjudication of the Ventura River Watershed including the Ventura
15 River Watershed Groundwater Basins alleges nine claims for relief: (1)
16 preliminary and permanent injunction reducing Cross-Defendants' use of surface
17 and/or subsurface water and groundwater affecting the surface and/or subsurface
18 flow of the Ventura River to a level of reasonable and beneficial use under
19 California Constitution Article X, Section 2; (2) preliminary and permanent
20 injunction reducing Cross-Defendants' use of surface and/or subsurface water and
21 groundwater affecting the surface and/or subsurface flow of the Ventura River to a
22 level of reasonable and beneficial use and a level that protects public trust
23 resources under the public trust doctrine; (3) declaratory relief for pueblo and/or
24 treaty water rights; (4) declaratory relief for prescriptive water rights; (5)
25 declaratory relief for appropriative water rights; (6) comprehensive adjudication
26 and physical solution; (7) declaratory relief for municipal priority; (8) declaratory
27 relief for the human right to water; and (9) declaratory relief regarding the Cross-
28 Complainant's use of surface and/or subsurface water and groundwater affecting

1 the Ventura River Watershed and declaratory relief that Cross-Defendants' water
2 uses are not reasonable or beneficial and violate the public trust doctrine. This
3 Third Amended Cross-Complaint includes claims regarding the groundwater uses
4 in the Ventura River Watershed Groundwater Basins. The Third Amended Cross-
5 Complaint also includes claims regarding surface water uses from the Ventura
6 River and its tributaries, which may be governed by future court orders.

7
8 (v) Date by which persons receiving this notice must appear in
9 comprehensive adjudication: Pursuant to Judge Highberger's Order, within sixty
10 (60) days of receipt of this notice and accompanying form answer, either by filing
11 the attached form answer or other appearance authorized by law.

12
13 (vi) Filing and Service of Court Documents. Filing in this case must be
14 done in one of three ways at the Stanley Mosk Courthouse, located at 111 North
15 Hill Street, Los Angeles, CA 90012,
16 <http://www.lacourt.org/courthouse/info/address/la>.

- 17 a. Deliver in person to: Stanley Mosk Courthouse, Complex Civil
18 Filing Window, First Floor, Room 102, between the hours of
19 8:30 a.m. and 4:30 p.m., Monday through Friday, except for
20 Court Holidays;
21 b. Mail to: Stanley Mosk Courthouse, 111 North Hill Street, Los
22 Angeles, CA 90012; or
23 c. Fax filing: Stanley Mosk Courthouse, General Jurisdiction-
24 Complex (Room 102), Facsimile Telephone Number: (442) 247-
25 3769

26 All service shall be made by electronic service through the provider File &
27 ServeXpress. To register, visit their website,
28

1 <https://os.fileandservexpress.com/web/ui/welcomepage.aspx>, or call 1-888-529-
2 7587.

3
4 (vii) Court fees. A first appearance fee of \$435 will be required for all
5 newly appearing cross-defendants, subject to any applicable waiver. No additional
6 complex fees are required in accordance with California Government Code section
7 70616.

8
9 (viii) Public Meetings. The City of San Buenaventura will hold two public
10 community meetings to explain the proceedings in this comprehensive adjudication
11 of the Ventura River Watershed. The meetings shall take place on:

12 Tuesday, December 10, 2019, 6:00 to 8:00 p.m.
13 Oak View Community Center, Kunkle Room
14 18 Valley Road
Oak View, CA 93022

15 Wednesday, December 18, 2019, 6:00 to 8:00 p.m.
16 Bell Arts Factory, Community Room
432 N. Ventura Ave
Ventura, CA 93001

17
18 Dated: _____, 2019

BEST BEST & KRIEGER LLP

19
20 By:

21 GENE TANAKA
22 SHAWN HAGERTY
23 SARAH CHRISTOPHER FOLEY
24 DAKOTAH BENJAMIN
25 Attorneys for Respondent and Cross-
26 Complainant CITY OF SAN
27 BUENAVENTURA
28

EXHIBIT B

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San Diego, California 92101
9 Tel.: 619.525.1300; Fax: 619.233.6118

10 Abogados de la Parte Demandada y Contrademandante
11 CIUDAD DE SAN BUENAVENTURA

12 TRIBUNAL SUPERIOR DEL ESTADO DE CALIFORNIA

13 CONDADO DE LOS ANGELES

14 SANTA BARBARA CHANNELKEEPER,
15 una corporación no lucrativa de California

16 Solicitante,

17 v.

18 JUNTA ESTATAL DE CONTROL DE
19 RECURSOS HÍDRICOS, una dependencia
estatal de California;
20 CIUDAD DE SAN BUENAVENTURA,
una corporación municipal de California,
21 nombrada de manera incorrecta como
CIUDAD DE BUENAVENTURA,

22 Demandados.

23 CIUDAD DE SAN BUENAVENTURA,
24 una corporación municipal de California,

25 Contrademandante

26 v.

26 DUNCAN ABBOTT, un individuo et al.

27 Contrademandados.

Caso No. 19STCP01176
Juez: Honorable William F. Highberger

AVISO DE INICIO DE ADJUDICACIÓN DE
CUENCAS Y CUENCAS SUBTERRÁNEAS

CMC:
Hora:
Dept: 10

Acción presentada: 19 de septiembre de 2014
FAC Presentada: 7 de septiembre de 2018
Fecha del juicio: Por definir

1 **AVISO DE INICIO DE ADJUDICACIÓN DE**
2 **CUENCA SUBTERRÁNEA**
3

4 ESTE AVISO ES IMPORTANTE. TODO DERECHO QUE USTED
5 RECLAME PARA BOMBLEAR O ALMACENAR AGUA SUBTERRÁNEA DE
6 LAS CUENCAS IDENTIFICADAS EN ESTE AVISO PUEDE SER AFECTADO
7 POR UNA DEMANDA INICIADA POR LA TERCERA CONTRADEMANDA
8 MODIFICADA QUE SE RESUME A CONTINUACIÓN.

9
10 Se puede obtener copia de la Tercera Contrademanda Modificada contactando
11 al abogado del Contrademandante identificado en este aviso. Si usted reclama
12 derechos para bombear o almacenar agua subterránea dentro de las cuencas
13 identificadas aquí, ya sea ahora o en un futuro, usted puede pasar a ser parte de esta
14 demanda al presentar una respuesta a la demanda en o antes de la fecha límite
15 especificada en este aviso. Usted puede presentar una respuesta completando el
16 formulario de respuesta adjunto, presentándolo ante el juzgado indicado en este aviso y
17 enviando copia al abogado del Contrademandante identificado abajo en este aviso.

18
19 El no participar en esta demanda podría tener un efecto adverso importante
20 sobre los derechos a bombear o almacenar agua subterránea que usted pudiera tener.
21 Usted puede buscar asesoría legal al respecto. En dado caso deberá hacerlo de
22 manera expedita. Una conferencia de administración de casos (“CMC”) en este
23 procedimiento de adjudicación de cuenca de aguas subterráneas está actualmente
24 programada para la fecha especificada en la portada de este aviso. Si tiene la
25 intención de participar en el procedimiento de adjudicación de agua subterránea
26 aplicable a este aviso, se le sugiere asistir personalmente a la próxima conferencia de
27 manejo de caso, o estar representado por un abogado en la próxima conferencia de
28 manejo de casos.

1 La participación requiere presentar toda la información relacionada con el
2 uso de agua subterránea. Usted deberá proporcionarla en un plazo de seis meses
3 a partir de la fecha en que aparezca en la adjudicación integral, salvo que las
4 partes estipulen lo contrario o que el Tribunal lo haya ordenado de conformidad
5 con la sección 842 del Código de Procedimiento Civil.

6
7 Para su conveniencia, se proporcionará un formulario de respuesta. Usted
8 puede llenarlo y presentarlo ante el tribunal. Si así lo decide, servirá como
9 respuesta a todas las demandas y contrademandas relativas a este caso.

10
11 Se proporciona la siguiente información de conformidad con el Código de
12 Procedimientos Civiles sección 836(a)(1)(B):

13 (i) Nombres de las Cuencas:

- 14 a. Cuenca subterránea superior del Río Ventura (Boletín 118
15 Cuenca subterránea Número 4-3.01 del Departamento de
16 Recursos Hídricos “DWR”);
17 b. Cuenca subterránea del Valle de Ojai (Boletín 118 Cuenca
18 Subterránea Número 4-2 del DWR);
19 c. Cuenca subterránea inferior del Río Ventura (Boletín 118
20 Cuenca subterránea Número 4-3.02 del DWR); y
21 d. Cuenca subterránea superior del Valle de Ojai (Boletín 118
22 Cuenca subterránea Número 4-1 del DWR)
23 (colectivamente “Cuencas subterráneas de la Cuenca del Río Ventura”).

24
25 Un mapa de cada una de las Cuenca Subterráneas de la Cuenca del Río Ventura está
26 a su disposición en <https://gis.water.ca.gov/app/bbat/>.

1 (ii) Caso No. 19STCP01176, Tribunal Superior del Condado de Los
2 Ángeles, División de Litigios Civiles Complejos, Departamento No. 010,
3 presidiendo el Juez William F. Highberger, ubicado en el 312 de North Spring,
4 en Los Ángeles, California 90012.

5
6 (iii) El abogado del Contrademandante puede ser contactado en la siguiente
7 dirección, número de teléfono, y correo electrónico:

8
9 Dakotah Benjamin
Best Best & Krieger LLP
2001 N. Main Street, Suite 390
10 Walnut Creek, California 94596
11 Teléfono: 925.977.3330
dakotah.benjamin@bbklaw.com

12
13 (iv) La Tercera Contrademanda Modificada que inicia esta acción para una
14 adjudicación integral de la Cuenca del Río Ventura, incluyendo las Cuencas
15 Subterráneas de la Cuenca del Río Ventura, alega nueve reclamaciones de
16 indemnización: (1) orden judicial preliminar y permanente que reduce el uso, por
17 parte de los Contrademandados, del agua superficial y/o subsuperficial y del agua
18 subterránea que afecta el flujo superficial y/o subsuperficial del Río Ventura a un
19 nivel de uso razonable y benéfico de acuerdo con el Artículo X, Sección 2 de la
20 Constitución de California; (2) orden judicial preliminar y permanente que reduce
21 el uso, por parte de los Contrademandados, del agua superficial y/o subsuperficial
22 y del agua subterránea que afecta el flujo superficial y/o subsuperficial del Río
23 Ventura a un nivel de uso razonable y benéfico y a un nivel que proteja los
24 recursos del fideicomiso público de acuerdo con la doctrina del fideicomiso
25 público; (3) medidas declaratorias para los derechos de agua de los pueblos y/o
26 tratados; (4) medidas declaratorias para los derechos de agua prescriptivos; (5)
27 medidas declaratorias para los derechos de agua apropiados; (6) adjudicación
28 integral y solución física; (7) medidas declaratorias para prioridad municipal; (8)

medidas declaratorias para el derecho humano al agua; y (9) medidas declaratorias con respecto al uso, por la parte Contrademandante, del agua superficial y/o subsuperficial y del agua subterránea que afecta la Cuenca del Río Ventura y una medida declaratoria de que los usos del agua, por la parte Contrademandada, no son razonables ni benéficos y violan la doctrina del fideicomiso público. Esta Tercera Contrademanda Modificada incluye reclamos relacionados con los usos del agua subterránea en las Cuencas Subterráneas de la Cuenca del Río Ventura. La Tercera Contrademanda Modificada también incluye reclamos relacionados por los usos de aguas superficiales del Río Ventura y sus afluentes, los cuales pueden ser regulados por futuras órdenes judiciales.

(v) Fecha límite para que las personas que reciben este aviso deban aparecer en la adjudicación integral: De conformidad con la Orden del Juez Highberger, deberá ser dentro de los sesenta (60) días siguientes a la recepción de esta notificación y formulario de respuesta que lo acompaña, sea al presentar el formulario de respuesta adjunto u otra comparecencia autorizada por la ley.

(vi) Presentación y notificación de los documentos de la Corte. La presentación de la demanda en este caso debe hacerse en una de las siguientes tres modalidades ante el Juzgado Stanley Mosk, ubicado en 111 de la calle North Hill, en Los Ángeles, CA 90012, <http://www.lacourt.org/courthouse/info/address/la>.

- a. En persona en: Juzgado de Stanley Mosk, Ventana de Archivo Civil Complejo, Primer Piso, Cuarto 102, de las 8:30 a.m. a las 4:30 p.m., lunes a viernes, excepto en vacaciones de la Corte;
- b. Por correo postal a: Juzgado de Stanley Mosk, 111 de la calle North Hill, Los Angeles, CA 90012; o

c. Presentación por Fax: Juzgado de Stanley Mosk, Complejo de
Jurisdicción General (Cuarto 102), Número de teléfono para
Facsimile: (442) 247-3769

Todos los servicios se deberán llevar a cabo por vía electrónica a través del
proveedor File & ServeXpress. Para registrarse, visite su sitio web,
<https://os.fileandservexpress.com/web/ui/welcomepage.aspx>, o llame al 1-888-529-
7587.

(vii) Honorarios judiciales. Se requerirá una cuota por primera
comparecencia de \$435 a todos los Contrademandados que aparezcan por primera
vez, sujeta a cualquier dispensa aplicable. No se requieren cargos compuestos
adicionales de acuerdo con la sección 70616 del Código de Gobierno de California.

(viii) Reuniones públicas. La ciudad de San Buenaventura llevará a cabo
dos reuniones públicas para explicar los procedimientos en esta adjudicación
integral de la vertiente de agua del río Ventura. Las reuniones habrán de tener
lugar:

10 de Diciembre de 2019, 6:00 p.m. a 8:00 p.m.
Centro Comunitario Oak View, Habitación Kunkle
18 Valley Road.
Ciudad de Oak View, CA 93022

18 de Diciembre de 2019, 6:00 p.m. a 8:00 p.m.
Centro Comunitario de Bells Arts Factory
432 N. Ventura Avenue
Ciudad de Ventura, CA 93001

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Fechado: _____, 2019

BEST BEST & KRIEGER LLP

Por: _____

GENE TANAKA
SHAWN HAGERTY
SARAH CHRISTOPHER FOLEY
DAKOTAH BENJAMIN
Abogados de la Parte Demandada y
Contrademandante CIUDAD DE
SAN BUENAVENTURA

EXHIBIT C

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER,
a California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES
CONTROL BOARD, a California State
Agency;
CITY OF SAN BUENAVENTURA, a
California municipal corporation,
incorrectly named as CITY OF
BUENAVENTURA,

Respondents.

Case No. 19STCP01176
Judge: Honorable William F. Highberger

FORM ANSWER

Action Filed: Sept. 19, 2014
FAC Filed: Sept. 7, 2018
Trial Date: Not Set

CITY OF SAN BUENAVENTURA, a
California municipal corporation,

Cross-Complainant

v.

DUNCAN ABBOTT, an individual, et al.

Cross-Defendants.

ANSWER TO ADJUDICATION **CROSS-COMPLAINT**

The undersigned denies all material allegations in the cross-complaint in this action that seeks to adjudicate rights in the Ventura River Watershed, including its groundwater basins, which are the (1) Upper Ventura River Groundwater Basin (Department of Water Resources' ("DWR") Bulletin 118, Groundwater Basin Number 4-3.01); (2) Ojai Valley Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-2); (3) Lower Ventura River Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-3.02); and (4) Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118 Groundwater Basin Number 4-1) and asserts all applicable affirmative defenses to that cross-complaint.

Date: _____

Signature

Name – Printed

Cross-Defendant Name

Mailing Address:

Street

City

State, Zip Code

Phone Number

Email Address

Attorney Information (if applicable):

Company/Firm Name

Attorney Name

Street Address

City

State, Zip Code

Phone Number

Fax Number

Email Address