



1 Thomas E. Jeffry (SBN 125265); Shahiedah
2 Shabazz (SBN 258565)
3 Arent Fox LLP – 555 West Fifth Street, 48th Floor
4 Los Angeles, CA 90013-1065

5 Telephone Number: (213) 629-7400

6 Thomas.jeffry@arentfox.com;
7 Shahiedah.shabazz@arentfox.com

8 Attorneys for Cross-Defendant **Community**
9 **Memorial Health System**

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

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

14 Petitioner,

15 v.

16 STATE WATER RESOURCES
17 CONTROL BOARD, etc., et al.,

18 Respondents.

19 CITY OF SAN BUENAVENTURA, etc.,

20 Cross-Complainant

21 v.

22 DUNCAN ABBOTT, an individual, et al.

23 Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

1 **INTRODUCTION**

2
3 Cross-Defendant Community Memorial Health System (“CMHS”), pursuant to Code of
4 Civil Procedure Code of Civil Procedure section 842(a), hereby submits its initial disclosures.
5 CMHS reserves the right to supplement this disclosure, where appropriate, at a future date. [Code
6 of Civ. Proc. §842(d)(1-3)]
7

8 **INITIAL DISCLOSURES**

9
10 1. **The name, address, telephone number, and email address of the party and, if**
11 **applicable, the party's attorney.**

12 Party Information:

13 Community Memorial Health System

14 Address: 147 N. Brent Street, Ventura, CA 93003

15 Phone Number: (805) 652-5011

16 Email Address: erayman@cmhshealth.org

17 Attorney Information:

18 ARENT FOX LLP

19 Thomas E. Jeffry and Shahiedah Shabazz

20 555 West Fifth Street, 48th Floor

21 Los Angeles, CA 90013-1065

22 Phone Number: (213) 629-7400

23 Email Addresses: Thomas.jeffry@arentfox.com; Shahiedah.shabazz@arentfox.com
24

25 2. **The quantity of any groundwater extracted from the basin by the party and**
26 **the method of measurement used by the party or the party's predecessor in interest for each**
27 **of the previous 10 years preceding the filing of the complaint:**
28

1 CMHS does not allege that it has extracted groundwater from the basin during the 10
2 years preceding the filing of the complaint.

3 3. **The type of water right or rights claimed by the party for the extraction of**
4 **groundwater.**

5 Not applicable, as CMHS does not allege that it has extracted groundwater from the basin
6 during the 10 years preceding the filing of the complaint.

8 4. **A general description of the purpose to which the groundwater has been put.**

9 Not applicable, as CMHS does not allege that it has extracted groundwater from the basin
10 during the 10 years preceding the filing of the complaint.

12 5. **The location of each well or other source through which groundwater has**
13 **been extracted.**

14 None.

16 6. **The area in which the groundwater has been used.**

17 Not applicable, as CMHS does not allege that it has extracted groundwater from the basin
18 during the 10 years preceding the filing of the complaint.

20 7. **Any claims for increased or future use of groundwater.**

21 CMHS claims and reserves the right to a reasonable and beneficial amount of water in the
22 future to irrigate its property's irrigable areas.

24 8. **The quantity of any beneficial use or any alternative water use that the party**
25 **claims as its use of groundwater under any applicable law, including, but not limited to,**
26 **Section 1005.1 , 1005.2 , or 1005.4 of the Water Code.**

1 Not applicable, as CMHS does not allege that it has extracted groundwater from the basin
2 during the 10 years preceding the filing of the complaint.

3
4 9. **Identification of all surface water rights and contracts that the party claims**
5 **provides the basis for its water right claims in the comprehensive adjudication.**

6 N/A.

7
8 10. **The quantity of any replenishment of water to the basin that augmented the**
9 **basin's native water supply, resulting from the intentional storage of imported or non-**
10 **native water in the basin, managed recharge of surface water, or return flows resulting**
11 **from the use of imported water or non-native water on lands overlying the basin by the**
12 **party, or the party's representative or agent, during each of the 10 calendar years**
13 **immediately preceding the filing of the complaint.**

14 CMHS asserts no replenishment of water to the basin that augmented the basin's native
15 water supply, during the 10 calendar years immediately preceding the filing of the
16 complaint.

17
18 11. **The names, addresses, telephone numbers, and email addresses of all persons**
19 **possessing information that supports the party's disclosures.**

20 Name: Emilie Rayman

21 Ms. Rayman may be contacted through her attorneys of record, Thomas E. Jeffry and
22 Shahiedah Shabazz, of Arent Fox LLP:

23 555 West Fifth Street, 48th Floor

24 Los Angeles, CA 90013-1065

25 Phone Number: (213) 629-7400

26 Email Addresses: Thomas.jeffry@arentfox.com; Shahiedah.shabazz@arentfox.com

12. **Any other facts that tend to prove the party's claimed water right.**

CMHS and its predecessors have provided medical and health care services on its Ojai property since 1960. As the population and needs within CMHS's service area increase, it has built additional buildings and expanded its existing buildings. Although CMHS does not currently extract groundwater from the basin, its water needs may increase in the future in correlation to operation and maintenance of its use of its property. CMHS reserves the right to supplement this disclosure, where appropriate, at a future date. (Code of Civ. Proc. § 842, subd. (d)(1)-(3).)

Dated: June 1, 2021

By:



Shahiedah Shabazz
Attorneys for Cross-Defendant
Community Memorial Health System

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3

4

6

7

9

10

11

12

14