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Attorneys for Cross-Defendants Danny Everett and Tiarzha Taylor

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER, a California non-profit corporation, Petitioner, vs. STATE WATER RESOURCES CONTROL BOARD, etc., et. al., Defendants. And related cross-complaint	CASE NO. 19STCP01176 Judge: Hon William F. Highberger **VERIFIED INITIAL DISCLOSURES (Code Civ. Proc., § 842, subd. (a))** Action Filed: September 19, 2014 Trial Date: None Set

Cross-Defendants Danny Everett and Tiarzha Taylor make the following initial disclosures:

1. Names: Danny Everett and Tiarzha Taylor, 12695 Koenigstein Road, Santa Paula, CA 93060.

2. The quantity of groundwater extracted from the basin by the party and the method of measurement used by the party or the party's predecessor in interest for each of the previous 10 years preceding the filing of the complaint: Quantity not measured and not known for each of the previous 10 years.

3. The type of water right claimed by the party for the extraction of groundwater: Overlaying property owners.

4. A general description of the purpose to which groundwater has been put: Domestic and agricultural use.

5. The location of each well or other source through which groundwater has been extracted: On property.

6. The area in which the groundwater has been used: In residence and on grounds.

7. Any claims for increased or future use of groundwater: As needed, including but not limited to expanded agricultural use.

8. The quantity of any beneficial use of any alternative water use that the party claims as its use of groundwater under any applicable law, including but not limited to, Section 1005.1, 1005.2, or 1005. 4 of the Water Code: N/A.

9. Identification of all surface water rights and contracts and contracts that the party claims provides the basis for its water right claims in the comprehensive adjudication: N/A.

10. The quantity of any replenishment of water to the basin that augmented the basin's native water supply, resulting from the intentional storage of imported or non-native water in the basin, managed recharge of surface water, or return flows resulting from the use of imported water or non-native water on lands overlying the basin by the party or the party's representative or agent, during each of the 10 calendar years immediately preceding the filing of the complaint: N/A for preceeding 10 calendar years.

11. The names, addresses, telephone numbers, and email addresses of all persons possessing information that supports the party's disclosures: Danny Everett and Tiarzha Taylor, 12695 Koenigstein Road, Santa Paula, CA 93060, (310) 339-5221, danny_everett@msn.com.

12. Any other facts that tend to prove the party's claimed water right: N/A.

Dated: June 1, 2021

LAW OFFICES OF DAVID R. GREIFINGER

/s/David Greifinger
David Greifinger, Esq.
Attorney for Cross-Defendants

VERIFICATION

I am the attorney of record for Danny Everett and Tiarzha Taylor, parties to this action. Such parties are absent from the county in which I have my office, and I make this verification for and on behalf of the parties for that reason. I have read the foregoing document. I am informed and believe and on that ground alleged that the matters stated in it are true.

Executed at Pacific Palisades, California on June 1, 2021.

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

/s/David Greifinger

David Greifinger, Esq.

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is: Law Offices of David Greifinger, 15515 W. Sunset Blvd., No. 214, Pacific Palisades, California 90272.

On June 1, 2021, I served the foregoing document described as **DEFENDANT SOULEFETE LLC'S MEMORANDUM OPPOSING SUMMARY ADJUDICATION** on the interested parties in this action as follows:

__ **BY MAIL -** I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

___ I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

___ **BY PERSONAL SERVICE -** I delivered such envelope by hand to the offices of the addressee.

_X_ **BY FILE & SERVEXPRESS-**I caused this document to be filed and electronically served via File & ServeXpress.

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

___ **FEDERAL -** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 1, 2021, in Pacific Palisades, California.

__David Greifinger _____ __*/s/ David Greifinger*__
Type or Print Name Signature

PROOF OF SERVICE LIST

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