



1 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**  
2 **RECORD:**

3           Upon filing the Verified Third Amended Cross-Complaint herein, Defendant and Cross-  
4 Complainant CITY OF SAN BUENAVENTURA, a California municipal corporation, being  
5 ignorant of the true names of cross-defendants of change of ownership parcels, and having  
6 designated such cross-defendants in the Cross-Complaint by fictitious names ROES 1 through  
7 1000, and having discovered the true names of said cross-defendants, hereby amends the Cross-  
8 Complaint by inserting such true names in the place and stead of such fictitious names where it  
9 appears in said Cross-Complaint, as follows:

NAME	ROE DESIGNATION
2705 Maricopa LLC, a California limited liability company	Roe 250
4205 Thacher Road LLC, a Delaware limited liability company	Roe 251
Richard Adams, Trustee of The Richard N. Adams and Verna Joy Adams Revocable Trust	Roe 252
Verna Adams, Trustee of The Richard N. Adams and Verna Joy Adams Revocable Trust	Roe 253
Lori M. Ahlberg, Trustee of The Chris V. Browning and M. Laverne Browning Trust dated September 13, 1990	Roe 254
Felipe Varela Arredondo, individually	Roe 255
Arroyo Mobile Home Park LLC, a California limited liability company	Roe 256
Holly Bakarich, individually	Roe 257
Baldwin Ranch LLC, a Nevada limited liability company	Roe 258
Edgar S. Benson, individually	Roe 259

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

NAME	ROE DESIGNATION
Nicolas G. Berbari, individually	Roe 260
Berryessa 1564, LLC, a California limited liability company	Roe 261
Boulevard Haussmann, LLC, a California limited liability company	Roe 262
Jennifer Kirsten Brewer, Trustee of The Nathan Ray Brewer and Jennifer Kirsten Brewer Trust of 2014	Roe 263
Nathan Ray Brewer, Trustee of The Nathan Ray Brewer and Jennifer Kirsten Brewer Trust of 2014	Roe 264
Lorne M. Buchman, Trustee of The Lorne Buchman Revocable Trust, 2004	Roe 265
Hinderikus Busz, Trustee of The Hinderikus Busz Revocable Trust	Roe 266
Samantha Casey, individually	Roe 267
Channel Island Holdings, LLC, a Delaware limited liability company	Roe 268
Herbert D. Chisum, individually	Roe 269
Virgil Clary, individually	Roe 270
James Congdon, Trustee of The Congdon Family Revocable Trust	Roe 271
Sandra Congdon, Trustee of The Congdon Family Revocable Trust	Roe 272
Culbert Family Partnership	Roe 273
Joshua L. Currier, individually	Roe 274
Kristen D. Currier, individually	Roe 275
Leland George Davis, Trustee of The Davis Lee Trust and The First Amended Lee Davis Trust	Roe 276

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

NAME	ROE DESIGNATION
Mario Del Nagro, individually	Roe 277
Maria Depaola, individually	Roe 278
James Desurra, individually	Roe 279
John Desurra, individually	Roe 280
Karen L. Edwards, individually	Roe 281
Cynthia A. Ellestad, Trustee of The Cynthia Ellestad Trust dated August 22, 2007	Roe 282
Christopher P. Fabian, individually	Roe 283
Adam C. Fenn, individually	Roe 284
Kimberly Fernandez, individually	Roe 285
Michael Flett, individually	Roe 286
Gary R. Gallion, Trustee of The Gary and Nancy Gallion Trust	Roe 287
Nancy L. Gallion, Trustee of The Gary and Nancy Gallion Trust	Roe 288
Robert Gavula, individually	Roe 289
Chris W. Gedwed, individually	Roe 290
Kalli N. Gedwed, individually	Roe 291
Steven J. Gluck, individually	Roe 292
Thayer A. Gowdy, individually	Roe 293
Kristine Griswold, individually	Roe 294
Ronda Grow, Trustee of The Grow Family Trust	Roe 295
Michael P. Halsell, individually	Roe 296
Linda Anne Shufeldt Gidden Haque, Trustee of The Haque Family Trust "A"	Roe 297

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

NAME	ROE DESIGNATION
Brandon Hansen, individually	Roe 298
Jamie Hansen, individually	Roe 299
Meghann L. Haven, individually	Roe 300
Juan L.R. Hernandez, individually	Roe 301
Brett Hitchman, Trustee of The George Replogle Statutory Minor's Trust	Roe 302
Lee Ann Hitchman, Trustee of The George Replogle Statutory Minor's Trust	Roe 303
Bethalyn Jonker, individually	Roe 304
Willem Jonker, individually	Roe 305
Janice Kanellis, individually	Roe 306
Kerstin C. Kuhn, individually	Roe 307
Lakeside Housing Partners, LP, a California limited partnership	Roe 308
Leap of Faith Partners, LLC, a California limited liability company	Roe 309
Left Coast Property Investments, LLC, a California limited liability company	Roe 310
Donald A. Lesch, individually	Roe 311
Sheryl A. Lesch, individually	Roe 312
Kelsey M. Lindsey, individually	Roe 313
Matthew D. Lindsey, individually	Roe 314
Honey Sharp Lippman, Trustee of The Nadia Szold Irrevocable Trust	Roe 315
Justin T. Lucia, individually	Roe 316
Patrick N. McCracken, individually	Roe 317

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

NAME	ROE DESIGNATION
Jeffrey McManus, individually	Roe 318
Julie McManus, individually	Roe 319
Deborah S. Meyer, individually	Roe 320
Megan Meyer, individually	Roe 321
Robert Meyer, individually	Roe 322
Byron Kathleen Mitchell, Trustee of The Stephen Mitchell and Byron Katie Trust Dated June 4, 2002, as amended	Roe 323
Stephen Mitchell, Trustee of The Stephen Mitchell And Byron Katie Trust Dated June 4, 2002, as amended	Roe 324
Brent Monsour, individually	Roe 325
Everest Mueller	Roe 326
Megan J. Rider-Mueller, individually	Roe 327
Niji Productions, Inc., a California corporation	Roe 328
Christopher Noxon, Trustee of The Christopher Noxon Living Trust	Roe 329
Cheryl Mae Olivere, Trustee of The Cheryl Mae Olivere and James Victor Olivere Trust	Roe 330
Michele Ouellet, individually	Roe 331
Pearl Street Associates, LLC, a California limited liability company	Roe 332
David Pickles, Trustee of The Pickles Family Trust dated December 13, 2016	Roe 333
Sasha Pickles, Trustee of The Pickles Family Trust dated December 13, 2016	Roe 334
Jillian Pinto, individually	Roe 335

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

NAME	ROE DESIGNATION
Hillary D. Plichter, individually	Roe 336
Joseph M. Plichter, individually	Roe 337
Jaime H. Redin, Trustee of The Jaime H. Redin and Maria De Lourdes Living Trust dated December 17, 2007	Roe 338
Maria De Lourdes Redin, Trustee of The Jaime H. Redin and Maria De Lourdes Living Trust dated December 17, 2007	Roe 339
Edward R. Richter, Trustee of The Nadia Szold Irrevocable Trust	Roe 340
Austin Ringelstein, individually	Roe 341
Kathleen P. Robertson, individually	Roe 342
Fatima Robinson, Trustee of The Fatima Robinson Living Trust dated June 2, 2015	Roe 343
Carmel A Rodriguez, individually	Roe 344
Haley K. Ryan, individually	Roe 345
Brian Smith, individually	Roe 346
Sharon Smith, individually	Roe 347
Justin Stiegemeyer, Trustee of The 4569 Grand Avenue Trust	Roe 348
Jason T. Stowell, Trustee of The Stowell Family Trust Dated June 6, 2007	Roe 349
Nanette Stowell, Trustee of The Stowell Family Trust Dated June 6, 2007	Roe 350
Dana Stuart, Trustee of The Dana Stuart Trust	Roe 351
Ann M. Supan, individually	Roe 352
Scott T. Supan, individually	Roe 353

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

<b>NAME</b>	<b>ROE DESIGNATION</b>
Zvi Azriel Swiatycki, Trustee of The Gary Barnett Trust	Roe 354
Charles J. Swift, individually	Roe 355
Nicole L. Swift, individually	Roe 356
Nadia Szold, Trustee of The Nadia Szold Irrevocable Trust	Roe 357
Pamela N. Tellez, individually	Roe 358
Brandon S. Titus, individually	Roe 359
Jessica M. Traviglia, individually	Roe 360
Alexandro Xavier Varela, individually	Roe 361
Angelina Manzo Varela, individually	Roe 362
Scott Warner, individually	Roe 363
Matthew Waterson, Trustee of The Green Door Trust	Roe 364
Rachel Waterson, Trustee of The Green Door Trust	Roe 365
Camren D. Whitledge, individually	Roe 366
Kelly L. Whitledge, individually	Roe 367
Daniel Wilber, individually	Roe 368
Jenna Wilber, individually	Roe 369
Thomas W. Wilber, individually	Roe 370
Yvonne Wilber, individually	Roe 371
Andrew T. Williams, individually	Roe 372
Iliana V. Dehoyos-Williams, individually	Roe 373
Rebecca Williams, individually	Roe 374
Scott Williams, individually	Roe 375





1 SHAWN HAGERTY, Bar No. 182435  
shawn.hagerty@bbkllaw.com  
2 BEST BEST & KRIEGER LLP  
655 West Broadway, 15th Floor  
3 San Diego, California 92101  
Telephone: (619) 525-1300  
4 Facsimile: (619) 233-6118

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

5 CHRISTOPHER M. PISANO, Bar No. 192831  
christopher.pisano@bbkllaw.com  
6 SARAH CHRISTOPHER FOLEY, Bar No. 277223  
sarah.foley@bbkllaw.com  
7 PATRICK D. SKAHAN, Bar No. 286140  
patrick.skahan@bbkllaw.com  
8 Best Best & Krieger LLP  
300 South Grand Avenue, 25th Floor  
9 Los Angeles, California 90071  
Telephone: (213) 617-8100  
10 Facsimile: (213) 617-7480

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

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

16 SANTA BARBARA CHANNELKEEPER,  
a California non-profit corporation,

Case No. 19STCP01176

17 Petitioner,

PROOF OF SERVICE

18 v.

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

19 STATE WATER RESOURCES  
20 CONTROL BOARD, a California State  
Agency;

21 Respondents.

22  
23 CITY OF SAN BUENAVENTURA, a  
California municipal corporation,

24 Cross-Complainant

25 v.

26 DUNCAN ABBOTT, an individual, et al.

27 Cross-Defendants.  
28

PROOF OF SERVICE

I am a resident of the State of California and over the age of eighteen years, and not a party to the action herein; my business address is Best Best & Krieger LLP, 2001 N. Main St. Suite 390, Walnut Creek, CA 94596. On March 3, 2021, I served the following document(s):

**AMENDMENT NUMBER 3 TO THE CITY OF BUENAVENTURA'S THIRD AMENDED CROSS-COMPLAINT TO SUBSTITUTE TRUE NAMES OF ROE CROSS-DEFENDANTS (FICTITIOUS NAME, CCP §474) (CHANGE OF OWNERSHIP)**

- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Walnut Creek, California addressed as set forth below. 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 that same day with postage thereon fully prepaid in the ordinary course of business.
- I caused such envelope to be delivered via overnight delivery. Such envelope was deposited for delivery by United Parcel Service following the firm's ordinary business practices.
- by transmission via **E-Service to File & ServeXpress** to the person(s) set forth below. Local Rules of Court 2.10 (P).
- By e-mail or electronic transmission.** I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Daniel Cooper  
Sycamore Law  
1004 O'Reilly Ave.  
San Francisco CA 94129  
Tel: (415) 360-2962  
daniel@sycamore.law

Matthew Bullock  
Deputy Attorney General  
California Department of Justice  
Natural Resources Law Section  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Tel: (415) 510-3376  
matthew.bullock@doj.ca.gov

Attorneys for Petitioner and Plaintiff  
Santa Barbara Channelkeeper

Attorneys for Respondent and Defendant State  
Water Resources Control Board

Marc N. Melnick  
Deputy Attorney General  
Attorney General's Office  
1515 Clay Street, 20th Floor  
P.O. Box 70550  
Oakland, CA 94612-0550

Eric M. Katz  
Supervising Deputy Attorney General  
Noah Golden – Krasner  
Deputy Attorney General  
Carol Boyd  
Deputy Attorney General

1 Tel: 510-879-0750  
2 Marc.melnick@doj.ca.gov

300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Tel. (213) 269-6343  
Fax (213) 897-2802  
Eric.Katz@doj.ca.gov  
Noah.goldenrasner@doj.ca.gov  
Carol.boyd@doj.ca.gov

5 Attorneys for Respondent and Defendant State  
6 Water Resources Control Board

Attorneys for Proposed Intervenor California  
Department of Fish & Wildlife

7 Edward J. Casey  
8 Alston & Bird LLP  
9 333 South Hope Street, 16th Floor  
10 Los Angeles, CA 90071  
11 Tel: 213.576.1000  
12 ed.casey@alston.com

Paul Blatz  
Ryan Blatz  
Blatz Law Firm  
206 N. Signal St. Suite G  
Ojai, CA 93023  
Tel: (805) 646-3110  
blatzlawfirm@gmail.com  
ryan@ryanblatzlaw.com

10 Attorneys for Cross-Defendants Bentley  
11 Family Limited Partnership; AGR Breeding,  
12 Inc.; and Southern California Edison  
13 Company

Attorneys for Cross-Defendants Troy Becker  
and Jeri Becker; Janet Boulton; Michael  
Boulton; Michael Caldwell; Joseph Peter  
Clark, successor in interest to the Joseph  
Clark and Linda Epstein Family Trust; Linda  
Louise Epstein, successor in interest to the  
Joseph Clark and Linda Epstein Family Trust;  
Michael I. Cromer and Jody D. Cromer;  
Michel A. Etchart, Trustee of the Michel A.  
Etchart Separate Property Trust, and Mark W.  
Etchart, Trustee of the Mark W. Etchart  
Sepertate Property Trust; Lawrence  
Hartmann; Ole Konig; Krotona Institute of  
Theosophy; Stephen Michtell and Kathleen  
Reid Mitchell, Trustees of the Stephen  
Mitchell and Byron Katie Trust; North Fork  
Springs Mutual Water Company; Stephen  
Robert Smith, Trustee of the Charles R. Rudd  
and Lola L. Rudd Trust, dated May 20, 2976;  
Shlomo Raz; Sylvia Raz; Senior Canyon  
Mutual Water Company; Siete Robles Mutual  
Water Company; Soule Park Golf Course,  
Ltd.; Telos, LLC; Victor C. Timar, Jr. Trustee  
of the Timar Family Trust; John Town; Trudie  
Town; Asquith Family Limited Partnership,  
Ltd.; Burgess Ranch; Cary Cheldin; Cynthia  
Daniels; Wayne Francis; David Friend; The  
Larry & Pat Hartmann Family Trust; The John  
N. Hartmann Trust; Gary Hirschcron; Cheryl  
Jensen; Lutheran Church of the Holy Cross of  
Ojai, California; Janice Sattler (Mineo); Eitan  
Sloustcher; Rogers-Cooper Memorial  
Foundation; Robert Norris (not yet appeared);  
Patricia Norris; Old Creek Road Mutual  
Water Company (not yet appeared); Margaret

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

Vanderfin; Telos Ojai, LLC (not yet appeared); Jennifer Ware; The Walker Jr. Living Trust; David Altman, Trustee of the 1190 El Toro Trust ; Babtiste Foundation; Sean A. Bennett and Leslie Bennett, Trustees of the Bennett Family Trust; Dwayne A. Bower and Marilyn E. Bower Trustees of the Bower Family Trust; Mark Terry Cline and Bonnie Bureson Cline, Trustees of the Mark Terry Cline and Connie Bureson Cline Revocable Trust; Robert R. Daddi and Darlene J. Daddi; Lucille A. Elrod, Trustee of the John and Lucille Elrod Family Trust; Friend's Stable & Orchard Inc. Daniel Hultgen, Trustee of the Hultgen Living Trust; Ojai Golf, LLC; Three Oaks, LLC, Erica J. Abrams, Trustee of the Erica J. Abrams Trust; Raul E. Alvarado and Hildegard M. Alvarado, Trustees of the Alvarado Family Trust; William Armstrong and April Nardini; Joseph Lynn Barthelemy and Elvira Lilly Barthelemy, Trustees of the Joseph Lynn Barthelemy and Elvira Lilly Barthelemy 2002 Family Trust; James S. Bennett and Carolyn D. Bennett, Trustees of the Bennett Family Trust; Sumeet Bhatia and Michael McDonald; John Joseph Broesamle and Katharine Sue Broesamle, Trustees of the Broesamle Family Trust; Richard Aaron Carlson, Trustee of the Richard Aaron Carlson Trust and Michelle Larson, Trustee of the Michelle Larson Family Trust; Thomas D. Carver and Cynthia L. Carver; Dana Cenicerros, Trustee of the Dana and Dawn Cenicerros Revocable Living Trust; Deborah Lys Martin Crawford; Frank Clay Creasey Jr.; Debra Joy Reed, Trustee of The Debra Joy Reed Revocable Trust Dated November 3, 1994; Frederic Devault; Diana Syvertson, Trustee of the Diana Syvertson Living Trust; Dive Deep L.L.C.; Douglas Roy Parent and Ann Marie Parent; William Erickson; Gelb Enterprises, L.P.; Jan Stephen Granade and Priscilla K. Granade, Trustees of the Granade Family Revocable Living Trust; Margot J. Griswold; Brian C. Haase and Marie Haase, Trustees of the B&M Haase Trust Dated October 8, 2019; Thomas Lann Harper and Jadona Collier-Harper; Ojai-Jackman L.L.C.; Kevin Rainwater and Marianne Ratcliff; Keith M. Nightingale and Victoria V. Nightingale, Trustees of The Nightingale Family Trust; Heide C. Kurtz, Trustee of The Kurtz Family Trust Dated January 19, 2019; Randall Leavitt, Trustee of The Randall B. Leavitt 2010 Trust; Edward C.

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

Leicht and Jacqueline M. Leicht, Trustees of The Leicht Family 2013 Revocable Trust Dated March 1, 2013; Paul Lepiane and Bengtson Bo; Robert Levin and Lisa Solinas, Trustees of The Levin Family Living Trust; Francis Longstaff and Shauna Longstaff, Trustees of The Longstaff Trust Dated October 11, 2018; Mandy Macaluso, Trustee of The Living Trust of Mandy Macaluso; Marilyn Wallace, Trustee of The Marilyn Wallace Separate Property Trust; Daniel J. McSweeney and Yoko McSweeney; Wendell M. Mortensen and Laura L. Mortensen, Trustees of The Mortensen Family Revocable Trust; Timothy Jerome Murch and Jody Caren Murch, Trustees of The Jodim Family 2007 Trust Dated July 31, 2007; Chris E. Platt and Hanh H. Platt; Robert Erickson, Trustee and Ronald Wilson; Michael D. Robertson and Kimberly A. Robertson, Trustees of The Robertson Family Trust; James P. Robie, Trustee of the Robie Family Trust; Petter Romming and Kimi Romming, Trustees; Marc Saleh, Trustee of The Saleh Family Trust; Konrad Stefan Sonnenfeld, Trustee of The Konrad Stefan Sonnenfeld Living Trust; Mark Sutherland, Trustee of The Sutherland Marital Trust; John H. Thacher and Caroline H. Thacher, Trustees of The Thacher Family Trust Dated January 2004; Gilbert G. Vondriska and Carolyn J. Vondriska, Trustees of The Vondriska Living Trust; William D. Rusin, Sr., Trustee of the William D. Rusin Sr. Revocable Trust; Oscar D. Acosta, Trustee of the Acosta Trust

William G. Short, Esq.  
Law Offices of William G. Short  
Post Office Box 1313  
Ojai, California 93024-1313  
Tel: (805) 490-6399  
Fax: (805) 640-1940  
billshortesq@me.com

Anthony Lee Francois  
Jeremy Talcott  
David Deerson  
Pacific Legal Foundation  
930 G Street  
Sacramento, CA 95814-1802  
Tel: (916) 419-7111  
Fax: (916) 419-7111  
alf@pacificlegal.org  
TFrancois@pacificlegal.org  
jtalcott@pacificlegal.org  
ddeerson@pacificlegal.org

Attorney for Cross-Defendant Robin Bernhoft

Attorney for Cross-Defendant Robin Bernhoft

1 Robert N. Kwong  
2 Dennis O. La Rochelle  
3 Arnold Larochelle Mathews Vanconas &  
4 Zirbel, LLP  
5 300 Esplanade Dr Ste 2100  
6 Oxnard, CA 93036  
7 Tel: (805) 988-9886  
8 rk Wong@atozlaw.com

6 Attorneys for Cross-Defendant Casitas  
7 Municipal Water District

8 Gregory J. Patterson  
9 Musick, Peeler & Garrett LLP  
10 2801 Townsgate Road, Suite 200  
11 Westlake Village, CA 91361  
12 Tel: (805) 418-3103  
13 Fax: (805) 418-3101  
14 g.patterson@musickpeeler.com

12 Attorneys for Cross-Defendants Robert C.  
13 Davis, Jr.; James Finch; Topa Topa Ranch  
14 Company, LLC; The Thacher School;  
15 Thacher Creek Citrus, LLC; Ojai Oil  
16 Company; Ojai Valley School; Sharon  
17 Hamm-Booth and David Robert Hamm, Co-  
18 Trustees of The Hamm 2004 Family Trust  
19 Dated April 29, 2004; and Reeves Orchard,  
20 LLC

17 Jeanne Zolezzi  
18 Herum Crabtree Suntag  
19 5757 Pacific Avenue, Suite 222  
20 Stockton, CA 95207  
21 Tel: (209) 472-7700  
22 Fax: (209) 472.7986  
23 jzolezzi@herumcrabtree.com

21 Attorneys for Cross-Defendant Meiners Oaks  
22 Water District and Ventura River Water  
23 District

23 Attorneys for Cross-Defendants Rancho  
24 Matilija Mutual Water Company; Bettina  
25 Chandler, Trustee of the Bettina Chandler  
26 Trust; Martin Gramckow and Linda  
27 Gramckow individually; Martin Gramckow,  
28 Trustee of the Monika G. Huss Irrevocable  
Trust, Trustee of the Karin W. Gramckow  
Irrevocable Trust, and Trustee of the Kurt J.  
Gramckow Irrevocable Trust

Patrick Loughman  
Cristian Arrieta  
Lowthorp, Richards, McMillan, Miller &  
Templeman  
300 Esplande Drive, Suite 850  
Oxnard, CA 93036  
Tel: 805.804.3848  
Ploughman@lrmmmt.com  
Carrieta@lrmmmt.com

Attorneys for Cross-Defendants Ernest Ford,  
Tico Mutual Water Company, and Betty  
Withers and Betty Bow Withers Trust

Lindsay F. Nielson  
Law Office of Lindsay F. Nielson  
845 E Santa Clara Street  
Ventura, CA 93001  
Tel: 805-658-0977  
nielsonlaw@aol.com

Attorneys for Cross-Defendant Meiners Oaks  
Water District and Ventura River Water  
District

Neal P. Maguire  
Ferguson Case Orr Patterson LLP  
1050 South Kimball Road  
Ventura, CA 93004  
Tel: (805) 659-6800  
nmaguire@fcoplw.com

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

Thomas S. Bunn III  
Elsa Sham  
Lagerlof Senecal Gosney & Kruse LLP  
301 N. Lake Avenue, 10th Floor  
Pasadena, CA 91101-5123  
Tel.: (626) 793-9400  
Fax: (626) 793-5900  
tombunn@lagerlof.com  
esham@lagerlof.com

Attorneys for Cross-Defendant St. Joseph's  
Associates of Ojai, California, Inc. and St.  
Joseph's Health and Retirement Center, Janis  
Long Nicholas, John Jay Nicholas, Jess Earl  
Long (aka Jess E. Long), Johana Rae Long,  
and Mary Margaret Long, Janis Long  
Nicholas and Jess E. Long as Trustees of the  
Long Family Trust

Alberto Boada  
Karen V. Marble  
Ventura County Counsel's Office  
800 South Victoria Avenue  
Ventura, CA 93009-1830  
Tel.: (805) 654-2590  
Fax: (805) 654-2185  
alberto.boada@ventura.org  
karen.marble@ventura.org

Attorneys for Cross-Defendant Ventura  
County Watershed Protection District and  
County of Ventura

Michael J. Van Zandt  
Nathan A. Metcalf  
Sean G. Herman  
Hanson Bridgett LLP  
425 Market Street, 26 Floor  
San Francisco, CA 94105  
Tel: 415-777-3200  
Fax: 415-541-9366  
mvanzandt@hansonbridgett.com  
nmetcalf@hansonbridgett.com  
sherman@hansonbridgett.com

Attorneys for Cross-Defendant Ventura  
County Watershed Protection District and  
County of Ventura

Scott Slater  
Bradley Herrema  
Christopher Guillen  
Brownstein Hyatt Farber Schreck LLP  
1021 Anacapa Street, 2nd Floor  
Santa Barbara, CA 93101  
Tel: (805) 963-7000  
Fax: (805) 965-4333  
sslater@bhfs.com  
bherrema@bhfs.com  
cguillen@bhfs.com

Attorneys for Cross-Defendant The Wood-  
Claeysens Foundation



1 Joseph C. Chrisman  
2 Hathaway, Perrett, Webster, Powers,  
3 Chrisman & Gutierrez  
4 5450 Telegraph Road  
5 Ventura, CA 93003  
6 (805) 644-7111  
7 jchrisman@hathawaylawfirm.com

David B. Cosgrove  
Jeffrey M. Oderman  
Douglas J. Dennington  
Jeremy N. Jungreis  
Rutan & Tucker, LLP  
611 Anton Boulevard, Suite 1400  
Costa Mesa, CA 92626-1931  
Tel: 714-641-5100  
Fax: 714-546-9035  
dcosgrove@rutan.com  
joderman@rutan.com  
ddennington@rutan.com  
jjungreis@rutan.com

8 Attorneys for Cross-Defendant Wood-  
9 Claeysens Foundation

Attorneys for Cross-Defendant Casitas  
Municipal Water District

10 Thomas E. Jeffry  
11 Debra J. Albin-Riley  
12 Stefan Bogdanovich  
13 Arent Fox LLP  
14 555 West Fifth Avenue, 48th Floor  
15 Los Angeles, CA 90013-1065  
16 (213) 629-7400  
17 (213) 629-7401  
18 Thomas.jeffry@arentfox.com  
19 Stefan.bogdanovich@arentfox.com

Andrew Brady  
DLA Piper LLP (US)  
550 South Hope Street, Suite 2400  
Los Angeles, CA 90071-2618  
Tel. (213) 330-7700  
Fax: (213) 330-7701  
andrew.brady@us.dlapiper.com

20 Attorneys for Cross-Defendant Community  
21 Memorial Health System

Attorneys for Cross-Defendant Integritas Ojai,  
LLC

22 Jennifer T. Buckman  
23 Andrew J. Ramos  
24 Holly Jacobson  
25 Bartkiewicz Kronick & Shanahan, PC  
26 1011 Twenty-Second Street  
27 Sacramento, CA 95816-4907  
28 Tel. (916) 446-4254  
Fax (916) 446-4018  
jtb@bkslawfirm.com  
hjj@bkslawfirm.com

David R. Krause-Leemon  
BEAUDOIN & KRAUSE-LEEMON LLP  
15165 Ventura Blvd., Suite 400  
Sherman Oaks, CA 91403  
Tel. (818) 205-2809  
Fax (818) 788-8104  
david@bk-llaw.com

Attorneys for Cross-Defendant City of Ojai

Attorneys for Cross-Defendant RDK Land,  
LLC

1 Eric J. Schindler  
Michelle J. Berner  
2 Kroesche Schindler LLP  
2603 Main Street, Suite 200  
3 Irvine, CA 92614  
Tel. (949) 387-0495  
4 Fax (888) 588-0034 Fax  
eschindler@kslaw.legal  
5 mberner@kslaw.legal

6 Attorneys for Cross-Defendant Oak Haven,  
LLC

7

8 Adam D. Wieder  
Barry C. Groveman  
9 Ryan Hiete  
Groveman Hiete LLP  
10 35 East Union Street, Suite B  
Pasadena, CA 91103  
11 Tel (626) 747-9383  
Fax (626) 747-9370  
12 awieder@grovemanhiete.com  
bgroveman@grovemanhiete.com  
13 rhiete@grovemanhiete.com

14 Attorneys for Cross-Defendant Michael  
Bradbury; Heidi Bradbury; and The Heidi  
15 Gramkow Trust

16 Ernest J. Guadiana  
Elkins Kalt Weintraub Reuben Gartside LLP  
17 10345 W. Olympic Boulevard  
Los Angeles, CA 90064  
18 Tel. (310) 746-4425  
eguardiana@elkinskalt.com

19

20

21 Attorneys for Michael Lombardo and Charles  
L. Ward III, as Co-Trustees of the Ward-  
22 Lombardo Living Trust

23

24

25

26

27

28

Brian A. Osborne  
Osborne Law Firm  
674 County Square Drive, Suite 308  
Ventura, CA 93003  
Tel. (805) 642-9283  
Fax (805) 642-7054  
osbornelawyer@gmail.com

Attorney for Cross-Defendants Brian A.  
Osborne; Ronald W. Rood and Susan B.  
Rood, Trustees of the Rood Family Trust

Peter A. Goldenring  
Mark R. Pachowicz  
Pachowicz | Goldenring A Professional Law  
Corporation  
6050 Seahawk Street  
Ventura, CA 93003-6622  
Tel. (805) 642-6702  
Fax (805) 642-3145  
attorneys@gopro-law.com

Attorneys for Cross-Defendant The Manfred  
Krankl and Elaine V. Krankl Living Trust

Justin M. Alvarez  
Lamdien T. Le  
The Alvarez Firm, A Law Corporation  
24005 Ventura Boulevard  
Calabasas, CA 91302  
Tel. (818) 224-7077  
Fax (818) 224-1380  
jalvarez@alvarezfirm.com  
dle@alvarezfirm.com

Attorneys for Cross-Defendant Rancho Sueño,  
LLC

1 Patrick L. Rendon  
2 Lamb and Kawakami LLP  
3 333 South Grand Avenue, Suite 4200  
4 Los Angeles, CA 90071  
5 Tel. (213) 630-5500  
6 Fax: (213) 630-5555  
7 prendon@lkgfirm.com

8 Attorneys for Real Party in Interest Emily V.  
9 Brown

10 David A. Ossentjuk  
11 Ossentjuk & Botti  
12 2815 Townsgate Road, Suite 320  
13 Westlake Village, CA 91361  
14 Tel: (805) 557-8081  
15 Fax: (805) 456-7884  
16 DOssentjuk@oandblawyers.com

17 Attorney for Cross-Defendant Robert Martin

18 Julie A. Baker  
19 2193 Maricopa Hwy  
20 Ojai, CA 93023  
21 (805) 646-8700  
22 Jandjbaker2@gmail.com

23 T&D Nevada Trust  
24 Dennis and Antoinette Mitchell  
25 Mitchell Homes Inc.  
26 P.O. Box 360  
27 Ojai, CA 93024  
28 (805) 340-2890  
amitc74383@aol.com

29 Anthonie M. Voogd  
30 918 Palomar Road  
31 Ojai, CA93023  
32 Tel. (805) 646-1512  
33 avoogd@stanfordalumni.org

Karen A. Feld  
Daniel S. Roberts  
Cole Huber LLP  
3401 Centrelake Drive, Suite 670  
Ontario, CA 91761  
Tel: (909) 230-4209  
Fax: (909) 937-2034  
kfeld@colehuber.com  
droberts@colehuber.com

Attorneys for Cross-Defendant Ventura  
Unified School District

Hermitage Mutual Water Company, and Santa  
Ana Ranch, Inc.

Attn: J. Roger Essick  
2955 Hermitage Road  
Ojai, CA 93023  
Tel. (805) 320-1406  
rogeressick@gmail.com

The Joseph Fedele 1995 Living Trust,  
Oriana Marie Fedele, Trustee  
Attn. Oriana Fedele  
P.O. Box 298  
Lahaina, HI 96767  
Tel. (818) 601-3161  
orianafedele@gmail.com

Michaela Boehm  
12293 topa Lane  
Santa Paula, CA 93060  
Tel. (323) 493-3737  
micboehm@me.com

Lawrence S. Mihalas  
Trustees of the Mihalas Family Trust  
419 21<sup>st</sup> Place  
Santa Monica, CA 90402  
Tel. (310) 739-0700  
lmihalas@gmail.com  
lmihalas@ucla.edu

1 Heather Blair  
2 556 So. Fair Oaks Ave., Ste 101  
3 Box 356  
4 Pasadena, CA 91105  
5 Tel. (626) 755-6566  
6 Hblair1946@gmail.com

7 Robert K. Cartin  
8 Cartin Family LLC  
9 505 Estremoz Ct.  
10 Oceanside, CA 92057  
11 Tel. (760) 429-4738  
12 bob.cartin@dvm.com

13 Del Cielo LLC  
14 Attn. Tim Carey, Managing Member  
15 22410 Hawthorne Boulevard, Suite 5  
16 Torrance, CA 90505  
17 Tel. (310) 787-6569  
18 tim@calvoterguide.com

19 Janice and Jesse Hillestad  
20 9611 N. Ventura Ave.  
21 Ventura, CA 93001  
22 Tel. (310) 614-8438  
23 janicehillestad@icloud.com  
24 jessehillestad@gmail.com

25 Carlos A Mejia  
26 Sophie A Wenzlau  
27 Department of Justice  
28 1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Tel. (916) 210-6379  
Fax: (916) 327-2319  
sophie.wenzlau@doj.ca.gov

Attorneys for California Department of Parks  
and Recreation

Jacob Slujter  
Rabindra Singh  
1070 McAndrew Road.  
Ojai CA 93023; Tel.  
(805) 646-2726  
ED@KFA.ORG

In Propria Persona for Krishnamurti  
Foundation of America

Martin Hartmann  
Whitney Hartmann  
430 S. Carrillo Road  
Ojai, CA 93023  
Tel. (805) 798-2253  
earthbuilding@gmail.com

Loa E. Bliss  
Loa E. Bliss 2006 Revocable Trust  
9030 Ojai Santa Paula Road  
Ojai, CA 93023  
Tel: (617) 750-8500  
loabliss@hotmail.com

Joyce Syme, and  
The Joyce A. Syme Living Trust  
1760 Ocean Avenue  
Santa Monica, CA 90401  
Tel. (310) 403-1760  
seaviewmotel@hotmail.com

Dale and Patricia Givner  
12617 Koenigstein Rd.  
Santa Paula, CA 93060  
Tel. (805) 525-9524  
dalegivner@gmail.com

Dennis and Nadine Corte  
12812 MacDonald Drive  
Ojai, CA 93023  
Tel. (805) 701-1950  
dwcorte@outlook.com

David R. Greifinger  
Law Offices of David R. Greifinger  
15515 West Sunset Blvd., No. 214  
Pacific Palisades, CA 90272  
Tel. (424) 330-0193  
tracklaw@me.com

Attorney for Cross-Defendants Danny Everett  
and Tiarzha Talyor

1 Kelton Lee Gibson George and Sigrid Bressler  
2 878 Oak Grove Court 340 Longhorn Lane  
3 Ojai, CA 93023 Ojai, CA 93023  
4 Tel. (805) 701-9318 Tel. (805) 646-1221  
5 kgibson@mwglaw.com andybsail@gmail.com  
6 kgibson878@gmail.com  
7  
8 Kelton Lee Gibson, Trustee of the Gibson  
9 Family Trust, dated June 6, 2006  
10  
11 Rebecca C. Collins Peter Duchesneau  
12 Thomas M. Collins, Jr. Sigrid R Waggener  
13 241 Longhorn Lane Mannat, Phelps & Phillips, LLP  
14 Ojai, CA 93023 One Embarcadero Center, 30<sup>th</sup> Floor  
15 Tel. 805-312-5894 San Francisco, CA 94111  
16 tominojai@gmail.com Tel. (415) 291-7400  
17 collinst3@sbcglobal.net Fax (415) 291-7474  
18 pduchesneau@manatt.com  
19 swaggener@manatt.com  
20  
21 Attorneys for Cross-Defendant Aera Energy,  
22 LLC  
23  
24 Claude R. and Patricia E. Baggerly Judith L. Mercer  
25 119 S. Poli Avenue c/o of Jason Goldman  
26 Ojai, CA 93023-2144 Mercer Family Trust Agreement of 1992  
27 Tel. (805) 646-0767 1175 Grand Avenue  
28 Tel. (805) 766-7317 Ojai, CA 93023  
russ.baggerly65@gmail.com Tel. (310) 625-7795  
jgoldman@bgroup.com  
Matthew Haffner Brian Moskal,  
Haffner Law Group Greenberg Glusker Fields Claman &  
86 S. Laurel Street Machtinger LLP  
Ventura, CA 93001 2049 Century Park East, Suite 2600  
Los Angeles, CA 90067  
Tel. (805) 641-9334 Tel. (310) 785-6833  
Fax (805) 980-5014 Fax (310) 201-2368  
mhaffner@haffnerlawgroup.com bmoskal@greenbergglusker.com  
Attorneys for Cross-Defendant Susan Moll Attorneys for Ginnetti Living Trust

1 Harry D. Sims and Raymond P. Sims  
2 P.O. Box 1870  
3 Ojai, CA 93024  
4 Tel. (805) 646-0167  
5 1978simfamilytrust@gmail.com

Tristan F. Mackprang  
David J. Farkas  
Coleman Frost LLP  
201 Nevada Street, Smoky Hollow  
El Segundo, CA 90245  
Tel. (424) 277-1650  
Fax (31) 648-9739  
tristan@colemanfrost.com  
david@colemanfrost.com

6 Attorneys for Cross-Defendants Housing  
7 Authority of the City of San Buenaventura,  
8 Triad Properties, Inc., Encanto Del Mar  
9 Apartments, L.P., Villages at Westview I LP,  
10 Vista Del Mar Commons, LP, and Soho  
11 Associates, L.P.

12 Andrew K. Whitman  
13 821 N. Signal Street  
14 Ojai, CA 93023  
15 Tel. (805) 444-5671  
16 sfreberg@scr-legaliner  
17 .com

Christopher Danch  
16200 Maricopa Highway  
Ojai, CA 93023  
Tel. (805) 640-8534  
chrisdanch@gmail.com

18 In pro per and Atty for Cross-Defendants  
19 Andrew K. Whitman and Heidi A. Whitman;  
20 Nancy L. Whitman; John R. Whitman and  
21 Nancy L. Whitman Family Trust

Attorney for Cross-Defendants Angie Marie  
Genasci and Christopher Paul Danch, Trustees  
of the Genasci-Danch Family Trust; and  
Donald and Wendy Givens

22 Paul R. Huff  
23 The Huff Law Firm APC  
24 21 S. California Street, Suite 205  
25 Ventura, CA 93001  
26 Tel. (805) 667-8940  
27 Fax (805) 850-7399  
28 phuff@hufffirm.com

Alessandro (Alex) Lobba  
Alessandro Lobba and Mary E. Jackson,  
individually as Trustees of the Lobba-Jackson  
Family Trust  
947 Casitas Vista Road  
Ventura, CA 93001  
Tel. (805) 895-7056  
alobba@gmail.com

Attorneys for Barnard Properties, LLC

Christine Steiner  
2560 Ladera Road  
Ojai, CA 93023  
Tel. (31) 600-3220  
csteiner@csteinerlaw.com

William Slaughter  
Slaughter, Reagan & Cole, LLP  
625 East Santa Clara Street, Suite 101  
Ventura, CA 93001  
Tel. (805) 658-7800  
Fax (805) 644-2131  
slaughter@srllplaw.com

Attorneys for The Boyd S. Dron and Karin  
Dron Joint Living Trust, and Sisar Mutual  
Water Company

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

Julia Taft-Whitman, President CEO  
Taft Corporation  
111 West Topa Topa Street  
Ojai, CA 93023  
Tel. (805) 794-2837  
juliawhitman@gmail.com

Jaide Whitman, President  
Julia Whitman, Director  
Conservation Endowment Fund  
P.O. Box 6  
Oak View, CA 93022  
Tel. (805) 649-2333  
Tel. (805) 804-7005  
jaide.whitman@gmail.com  
TaftGardensOffice@gmail.com

Kelley M. Rasmussen, Trustee  
2420 Park Road  
Lake Oswego, OR 97034  
Tel. (805) 798-7125  
kelleyras@gmail.com

Angela Small Booth, Attorney  
2175 Valley Meadow Drive  
Oak View, CA 93022  
Tel. (805) 765-5413  
angie@angiesmall.org

Lindy Goetz  
lindygoetz@roadrunner.com

Via First Class Mail

Via First Class Mail

Warren W. Green  
Bonnie M. Green  
985 E. Main Street  
Ventura, CA 93001  
Tel. (805) 652-1080  
Fax (805) 652-0400

Salvatore Scarpato  
106 Calhoun Lane  
Georgetown, TX 78633  
(805) 797-8767

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

Executed on March 3, 2021 at Walnut Creek, California.



Irene Islas