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8 Attorneys for Cross-Defendants Danny Everett and Tiarzha Taylor

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

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

13 Petitioner,

14 vs.

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

17 Defendants.

18 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

19
20 Cross-Defendants Danny Everett and Tiarzha Taylor make the following initial
21 disclosures:

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

24 2. The quantity of groundwater extracted from the basin by the party and the method
25 of measurement used by the party or the party's predecessor in interest for each of the previous
26 10 years preceding the filing of the complaint: Quantity not measured and not known for each of
27 the previous 10 years.

28

INITIAL DISCLOSURES

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

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

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

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

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

10 8. The quantity of any beneficial use of any alternative water use that the party
11 claims as its use of groundwater under any applicable law, including but not limited to, Section
12 1005.1, 1005.2, or 1005. 4 of the Water Code: N/A.

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

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

21 11. The names, addresses, telephone numbers, and email addresses of all persons
22 possessing information that supports the party's disclosures: Danny Everett and Tiarzha Taylor,
23 12695 Koenigstein Road, Santa Paula, CA 93060, (310) 339-5221, danny_everett@msn.com.

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

25 Dated: June 1, 2021

LAW OFFICES OF DAVID R. GREIFINGER

/s/David Greifinger

David Greifinger, Esq.

Attorney for Cross-Defendants

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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.