



JENNIFER T. BUCKMAN, State Bar No. 179143
HOLLY J. JACOBSON, State Bar No. 281839
BARTKIEWICZ, KRONICK & SHANAHAN
A PROFESSIONAL CORPORATION
1011 Twenty-Second Street
Sacramento, California 95816-4907
Telephone: (916) 446-4254
Facsimile: (916) 446-4018
E-Mail: jtb@bkslawfirm.com
hjj@bkslawfirm.com

Attorneys for City of Ojai

Exempt from Filing Fees
Gov. Code, § 6103

SUPERIOR COURT FOR 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 BUENA VENTURA, a
California municipal corporation, incorrectly
named as CITY OF BUENA VENTURA,

Respondents.

CITY OF SAN BUENA VENTURA, a
California municipal corporation,

Cross-Complainant,

v.

DUNCAN ABBOTT;
AGR BREEDING, INC; et al.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

**CITY OF OJAI'S INITIAL
DISCLOSURES**

Action Filed: September 19, 2014

First Amended Complaint Filed:
September 7, 2018

TO ALL PARTIES HEREIN AND TO THEIR RESPECTIVE ATTORNEYS OF
RECORD:

The City of Ojai ("Ojai") hereby submits the following initial disclosures pursuant to the Court's Order regarding the need for the same under California Code of Civil Procedure section 842¹. Ojai makes these disclosures after reasonable investigation and based on information reasonably available to it. Ojai reserves the right to supplement these disclosures as discovery and investigation continue. By this disclosure, Ojai in no way waives its defenses or stated objections to this proceeding or its rights to rely on documents or other information which have not been included in this initial disclosure due to good faith oversight, mistake, inadvertence, or other justifiable reasons. Further, Ojai does not waive any privileges or protections that may be related to any information or documents disclosed herein, all of which are reserved. Finally, Ojai objects to the term "basin" as vague and ambiguous as it relates to this matter.

DISCLOSURE

1. The name, address, telephone number, and email address of the party and, if applicable, the party's attorney:

Party Information: City of Ojai

Party of Attorney Information: Jennifer T. Buckman

Holly J. Jacobson

1011 22nd Street, Sacramento, CA 95816

(916) 446-4254

jtb@bkslawfirm.com; hjj@bkslawfirm.com

¹ Ojai's filing of these disclosures is not a waiver of its objections to the nature of this action and all processes that ignore the procedural requirements of C.C.P. section 832 et. seq., including the requirement to that Ventura establish appropriate jurisdiction over the four basins and cross-defendants.

2. **The quantity of any 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:**

Ojai is a named Cross-Defendant based upon its status as an overlying landowner. It has not extracted any groundwater in the Ojai Basin, or any of the four basins, at any time in the 10 years preceding the filing of the complaint. For this reason, responses to the items 3-10 are not applicable ("N/A") to Ojai. This response and disclosure does not waive Ojai's rights to groundwater as an overlying landowner of the Ojai basin, as defined in Bulletin 118. Ojai reserves its rights as an overlying landowner to all future use of groundwater.

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**

Ojai does not manage the groundwater basin and therefore lacks information sufficient to answer the question.

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

James Vega
City Manager
City of Ojai
401 S. Ventura St., Ojai, CA 93023
(805) 646-5581
james.vega@ojai.ca.gov

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

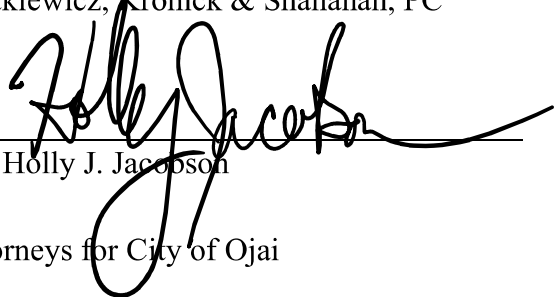
Ojai is an owner of property overlying the groundwater basin and has the right to exercise the groundwater pumping rights associated with that property. Ojai reserves the right to supplement or amend these disclosures to include additional information or as otherwise provided by Code of Civil Procedure section 842 or other authority.

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

Dated: June 1, 2021

Respectfully submitted,

Bartkiewicz, Kronick & Shanahan, PC

By: 

Holly J. Jacobson

Attorneys for City of Ojai