



ANDREW K. WHITMAN (SBN 128358)
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In Pro Per and Attorney for
Heidi A. Whitman, Nancy L.
Whitman and John R. and Nancy
L. Whitman Family Trust

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE 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 BUENAVENTURA, a
California municipal corporation, incorrectly
named as CITY OF BUENAVENTURA,

Respondents.

CITY OF SAN BUENAVENTURA,
a California municipal corporation,

Cross-Complainant,

v.

DUNCAN ABBOTT, an individual, et al.

Cross-Defendants.

Case No. 19STCP01176

Assigned to Judge William F. Highberger
Dept.: 10

Complaint filed: September 19,
2014 INITIAL DISCLOSURE OF
DEFENDANTS ANDREW K. WHITMAN,
HEIDI A. WHITMAN, NANCY L.
WHITMAN AND JOHN R. AND NANCY
L. WHITMAN FAMILY TRUST [CIVIL
CODE 842]

DISCLOSURES OF ANDREW AND HEIDI WHITMAN

CC 842(a)(1) Name, address, telephone number, and email address

Andrew and Heidi Whitman; property address 821 N. Signal St., Ojai CA
andyw821@gmail.com; Represented by attorney Andrew K. Whitman

CC 842(a)(2) Quantity of Groundwater Extracted

No groundwater is extracted from the property nor has any water been extracted from the property during the past 10 years. All water for the property is for residential use supplied by Casitas Municipal Water District (previously by Golden State Water).

CC 842(a)(3) Type of Water Right Claimed for Groundwater Extraction

Property overlies the Ojai Groundwater Basin. Cross-defendants claim all rights available to overlying owners who do not currently extract groundwater.

CC 842(a)(4) Description of the purpose to which the groundwater has been put

No groundwater is extracted from the property. All water use on the property is reasonable and beneficial residential use.

CC 842(a)(5) The location of each well

There are no groundwater extraction wells on the property

CC 842(a)(6) The area in which the groundwater has been used

There are no groundwater extraction wells on the property.

CC 842(a)(7) Any claims for increased or future use of groundwater.

Cross-defendants claim all rights available to overlying land owners who do not currently extract groundwater (including but not limited to a future groundwater well and groundwater extraction).

CC 842(a)(8) The quantity of any beneficial use of any alternative water

Not applicable.

CC 842(a)(9) Surface water rights and contracts

No surface water right is claimed.

CC 842(a)(10) Replenishment of water to the basin

Not applicable.

CC 842(a)(11) Persons with knowledge of these disclosures

Andrew and Heidi Whitman

CC 842(a)(12) Any other facts that tend to prove the party's claimed water right

Cross-Complainant City of Ventura has no right to claim any form of water right associated with the subject property.

DISCLOSURES OF JOHN AND NANCY WHITMAN FAMILY TRUST

CC 842(a)(1) Name, address, telephone number, and email address

The trust can be contacted through its attorney Andrew Whitman 821 N. Signal St., Ojai CA andyw821@gmail.com. The property is located at 12615 Koenigstein Rd., Santa Paula, CA

CC 842(a)(2) Quantity of Groundwater Extracted

No groundwater is or has ever been extracted from the Ventura River Lower Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.

CC 842(a)(3) Type of Water Right Claimed for Groundwater Extraction

No groundwater is or has ever been extracted from the Ventura River Lower Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin. This cross-defendant claims no right to extract any groundwater to any of the four basins.

CC 842(a)(4) Description of the purpose to which the groundwater has been put

No groundwater is or has ever been extracted from the Ventura River Lower Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin. CC

842(a)(5) The location of each well

No groundwater is or has ever been extracted from the Ventura River Lower Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.

CC 842(a)(6) The area in which the groundwater has been used

No groundwater is or has ever been extracted from the Ventura River Lower Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.

1 **CC 842(a)(7) Any claims for increased or future use of groundwater.**

2 Cross-defendant makes no claims for groundwater usage from the Ventura River Lower
3 Basin, Ventura River Upper Basin, Ojai Groundwater Basin or Upper Ojai Groundwater Basin.
4 claim all rights available to overlying owners who do not currently extract groundwater. Cross-
5 defendant does not anticipate making such claims in the future.

6 **CC 842(a)(8) The quantity of any beneficial use of any alternative water**

7 Not applicable.

8 **CC 842(a)(9) Surface water rights and contracts**

9 No surface water that flows to the Ventura River is claimed. Any surface water on the
10 property flows to the Santa Clara River.

11 **CC 842(a)(10) Replenishment of water to the basin**

12 Not applicable.

13 **CC 842(a)(11) Persons with knowledge of these disclosures**

14 Andrew Whitman

15 **CC 842(a)(12) Any other facts that tend to prove the party's claimed water right**

16 Cross-Complainant City of Ventura has no right to make any claim concerning surface
17 or groundwater associated with Cross-defendant's property.

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Andrew K. Whitman, individually,
21 and as attorney for Heidi Whitman and
22 John R. and Nancy L. Whitman
23 Family Trust
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