

1 Trevor Quirk  
877 S. Victoria, Ste. 111  
2 Ventura, CA 93003  
Telephone: 805-650-7778  
3 Facsimile: 866-728-7721  
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6 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
7 COUNTY OF LOS ANGELES

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

10 Petitioner,

11 v.

12 STATE WATER RESOURCES CONTROL  
13 BOARD, et al,

14 Respondents.

15 CITY OF SAN BUENAVENTURA, et al.,

16 Cross-Complainant,

17 v.

18 DUNCAN ABBOTT, an individual, et al.,

19 Cross-Defendants.  
20

Case No. 19STCP01176

Judge: Hon. William F. Highberger

DECLARATION OF TREVOR QUIRK  
RE: JOINT TRIAL READINESS  
CONFERENCE STATEMENT

Date: 03/11/22 FSC

Time: 1:30PM

Dept.: 10

Action Filed: Sept. 19, 2014

Trial Date: March 16, 2022

21 I, Trevor Quirk, declare that:

22 1. I am an attorney duly licensed to practice before all of the Courts of the State of  
23 California. I am counsel for myself, Cross-Defendant Trevor Quirk, Trustees of the Quirk/Gooden  
24 Family Trust, Roe 199, and my wife, Cross-Defendant Aletheia Gooden, Trustee of the  
25 Quirk/Gooden Family Trust, Roe 95. Unless otherwise stated, the contents of this Declaration are  
26 based upon my personal knowledge and I could testify competently to the matters stated herein.

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1           2.       I am submitting this Declaration because the City of Ventura’s (“CITY”) JOINT  
2 TRIAL READINESS CONFERENCE STATEMENT (“STATEMENT”) is not “joint” and  
3 contains self-serving misstatements designed to mislead the Court.

4           3.       For example, the first paragraph of the CITY’S STATEMENT, at page 2, lines 4-6  
5 provides: “[o]n February 4, 2022, the City emailed a draft of this Statement to all parties who have  
6 appeared and invited input and joinder and subsequently addressed all comments received or  
7 identified areas of dispute.” (emphasis added).

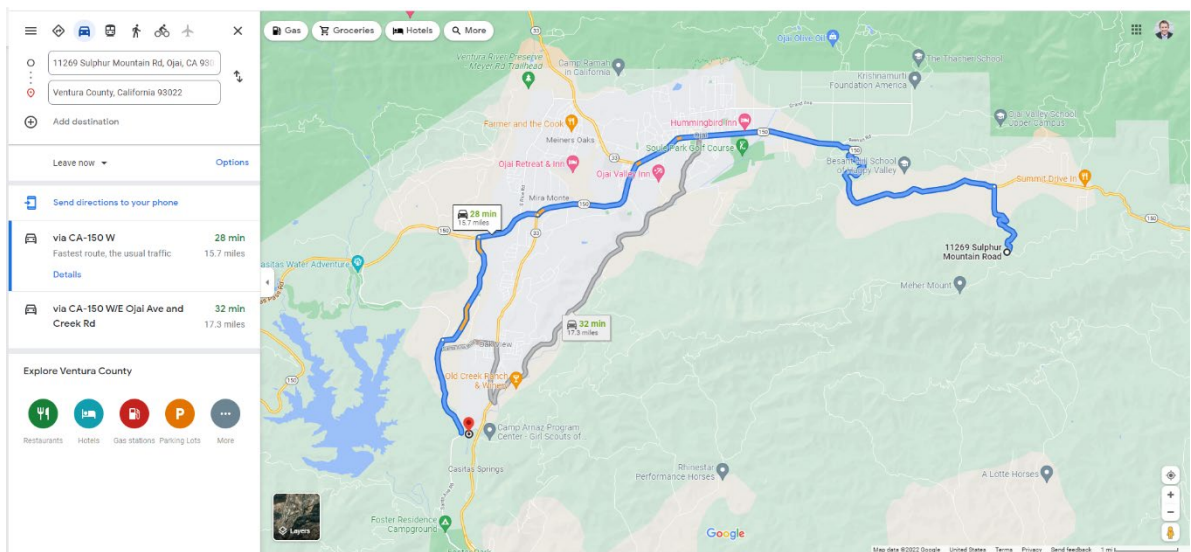
8           4.       Contrary to the CITY’s self-serving statement, it has not addressed the issue of  
9 whether my wife and I (and all other similarly situated Cross-Defendants the CITY chose to sue),  
10 are proper parties to this litigation.

11           5.       My wife and I are trustees of the Quirk/Gooden Family Trust (“TRUST”).

12           6.       The TRUST owns two parcels of land, APNs 037-0-011-35 and 037-0-012-220  
13 (“PARCELS”) located in Upper Ojai, CA.

14           7.       The PARCELS are located 15 miles away from the Ventura River.

15           8.       This is a true and correct copy of a Google Map depicting driving directions from  
16 the PARCELS to the Ventura River:



27           9.       The PARCELS are located outside of the Court determined groundwater basin  
28 boundaries.

