



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

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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,
17 a California non-profit corporation,
18
19 Petitioner,
20
21 v.
22 STATE WATER RESOURCES
23 CONTROL BOARD, etc., et al.,
24
25 Respondents.

23 CITY OF SAN BUENAVENTURA, etc.,
24
25 Cross-Complainant
26
27 v.
28 DUNCAN ABBOTT, an individual, et al.
29
30 Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

SECOND SUPPLEMENTAL DECLARATION
OF MARNIE PROCK IN SUPPORT OF EX
PARTE APPLICATION BY CROSS-
COMPLAINANT CITY OF SAN
BUENAVENTURA IN SUPPORT OF ORDER
TO SHOW CAUSE FOR PUBLICATION OF
SUMMONS ON UNSERVED CROSS-
DEFENDANTS [CCP §§ 415.50]

Action Filed: Sept. 19, 2014
Trial Date: Feb. 14, 2022

1 I, Marnie A. Prock, declare and state as follows:

2 1. I am over the age of eighteen years and a senior paralegal employed by the law
3 firm of Best Best & Krieger LLP (“BBK”), attorneys of record for Respondent and Cross-
4 Complainant, City of San Buenaventura (“CITY”) in the above-entitled action (“Action”).

5 2. I have been a paralegal in California for more than 21 years and have held various
6 positions in two of California’s largest and most historic public law firms for more than 31 years.
7 I have been employed by BBK since September, 2010.

8 3. My day to day activities include all facets of litigation, including research related
9 to real property ownership, analyzing deeds and title reports, locating individuals and corporate
10 entities for service of process, researching probate records for heirs and devisees, analyzing
11 policy and procedures relating to court filings and processes, and seeking orders for publication
12 and posting of summons when necessary for quiet title, title defect, eminent domain and
13 prescriptive rights cases.

14 4. Each of the facts stated herein are within my personal knowledge, and I would so
15 testify if called as a witness at any hearing.

16 5. This is a supplement to my declaration which was filed on July 15, 2021 in support
17 of the order to show cause regarding request for publication of unserved Cross-Defendants.

18 6. I and staff that I oversee and supervise sent an overnight delivery package to Cross
19 Defendant Linh T. Andren’s Simi Valley address as stated in my Supplemental Declaration on
20 July 15, 2021. The proof of delivery via UPS is attached hereto and incorporated herein by
21 reference as Exhibit A.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct, and that this declaration was executed on July 16, 2021, at Stockton,
24 California.


25 
26 Marnie Prock

EXHIBIT A

Ann Brown

From: UPS <pkginfo@ups.com>
Sent: Friday, July 16, 2021 12:56 PM
To: Ann Brown
Subject: UPS Delivery Notification, Tracking Number 1Z0047351395945896

CAUTION - EXTERNAL SENDER.



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BEST BEST & KRIEGER LLP

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Number of Packages:	1
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