



1 PATRICK T. LOUGHMAN, STATE BAR NO. 105990

ploughman@lrmmt.com

2 CRISTIAN R. ARRIETA, State Bar No. 236837

carrieta@lrmmt.com

3 LOWTHORP RICHARDS MCMILLAN

MILLER & TEMPLEMAN

4 300 Esplanade Drive, Suite 850

Oxnard, California 93036

5 Telephone: (805) 981-8555

6 Facsimile: (805) 983-1967

7 Attorneys for Cross-Defendant,

ERNIE FORD

8

9

SUPERIOR COURT OF THE STATE OF CALIFORNIA

10

COUNTY OF LOS ANGELES

11

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

13

Petitioner,

14

v.

15

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

17

Respondents.

18

CITY OF SAN BUENAVENTURA, etc.,

19

Cross-Complainant

20

v.

21

DUNCAN ABBOTT, an individual, et al.

22

Cross-Defendants.

23

24

25

26

27

28

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

1                    INITIAL DISCLOSURES – CODE OF CIVIL PROCEDURE SECTION 842(a)

2  
3            1.        The name, address, telephone number, and email address of the party and, if  
4 applicable, the party's attorney.

5            (a)        Name: Ernie Ford.

6            (b)        Address: 14845 Maricopa Highway, Ojai, California 93023.

7            (c)        Phone Number: (805) 340-5004.

8            (d)        Email Address: carlyinoj@aol.com.

9            (e)        Attorney (if applicable): Patrick T. Loughman and Cristian R. Arrieta of  
10 Lowthorp Richards McMillan Miller & Templeman.

11  
12           2.        The quantity of any groundwater extracted from the basin by the party and the  
13 method of measurement used by the party or the party's predecessor in interest for each of the  
14 previous 10 years preceding the filing of the complaint.

15

16 <b>Year</b>	16 <b>Amount of Groundwater           Extracted:</b>	16 <b>Method of Extraction:</b>
17    2019	17    75-acre feet estimate per 18    Ventura River 18    Groundwater Agency 19    subject to modification due 19    to lack of adequate records.	Pumping
20    2018	20    75-acre feet estimate per 21    Ventura River 21    Groundwater Agency 22    subject to modification due 22    to lack of adequate records.	Pumping
23    2017	23    75-acre feet estimate per 24    Ventura River 24    Groundwater Agency 25    subject to modification due 25    to lack of adequate records.	Pumping
26    2016	26    75-acre feet estimate per 27    Ventura River	Pumping

28

Year	Amount of Groundwater Extracted:	Method of Extraction:
	Groundwater Agency subject to modification due to lack of adequate records.	
2015	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2014	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2013	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2012	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2011	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2010	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping

3. The type of water right or rights claimed by the party for the extraction of groundwater.

1 Rights attendant to fee ownership including groundwater and to the surface water flowing  
2 throughout the property.

3

4 4. A general description of the purpose to which the groundwater has been put.  
5 Agricultural irrigation.

6

7 5. The location of each well or other source through which groundwater has been  
8 extracted.

9 Ventura County Assessor Parcel Numbers 010-0-050-010.

10

11 6. The area in which the groundwater has been used.  
12 Ventura County Assessor Parcel Numbers 010-0-050-010; 240; and 280.

13

14 7. Any claims for increased or future use of groundwater.  
15 Unknown at this time.

16

17 8. The quantity of any beneficial use of any alternative water use that the party  
18 claims as its use of groundwater under any applicable law, including, but not limited to, Section  
19 1005.1 , 1005.2 , or 1005.4 of the Water Code.

20 Unknown at this time.

21

22 9. Identification of all surface water rights and contracts that the party claims  
23 provides the basis for its water right claims in the comprehensive adjudication.

24 Riparian rights based on fee ownership. Water right identification number A017621.

25

26 10. The quantity of any replenishment of water to the basin that augmented the basin's  
27 native water supply, resulting from the intentional storage of imported or non-native water in the  
28 basin, managed recharge of surface water, or return flows resulting from the use of imported

1 water or non-native water on lands overlying the basin by the party, or the party's representative  
2 or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Year	Quantity of replenishment of water
2019	Not applicable.
2018	Not applicable.
2017	Not applicable.
2016	Not applicable.
2015	Not applicable.
2014	Not applicable.
2013	Not applicable.
2012	Not applicable.
2011	Not applicable.
2010	Not applicable.

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

27 (a) Name: Ernie Ford.

28 (b) Address: 14845 Maricopa Highway, Ojai, California 93023.

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

(c) Phone Number: (805) 340-5004.

(d) Email Address: carlyinoj@aol.com.

(a) Name: \_\_\_\_\_

(b) Address: \_\_\_\_\_

(c) Phone Number: \_\_\_\_\_

(d) Email Address: \_\_\_\_\_

(e) Name: \_\_\_\_\_

(f) Address: \_\_\_\_\_

(g) Phone Number: \_\_\_\_\_

(h) Email Address: \_\_\_\_\_

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

None at this time but Cross-Defendant reserves the right to amend or supplement this statement based on additional discovery and further research.

Dated: June 29, 2021

  
\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
ERNIE FORD

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

VERIFICATION

I have read the foregoing INITIAL DISCLOSURE and know its contents.

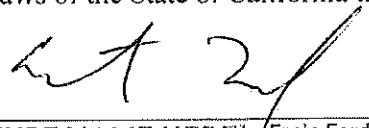
I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am \_\_\_\_\_ of \_\_\_\_\_, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

I am one of the attorneys of record for \_\_\_\_\_, a party to this action. Such party is absent from the county in which I have my office, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

Executed at [CITY] Ventura, California on June 29, 2021.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
\_\_\_\_\_  
[TYPE NAME HERE] Ernie Ford