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Attorneys for Cross-Defendant Oak Haven, LLC

**Superior Court Of 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  
Buenaventura, a California municipal  
corporation, incorrectly named as City  
of Buenaventura,

Respondents

Case No.: 19STCP01176

[Unlimited Jurisdiction]

Assigned for all Purposes to Judge William  
F. Highberger, Dept. C10

Complaint Filed: September 19, 2014

Trial Date: TBD

Initial Disclosures

City of San Buenaventura, a California  
municipal corporation,

Cross-Complainant

v.

Duncan Abbott, an individual, et al.

Cross-Defendants





**Initial Disclosures – Code of Civil Procedure Section 842 (a)'**

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

a). Name: Oak Haven, LLC; represented by:

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b). 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 ten (10) years preceding the filing of the complaint.

2. The quantity of water extracted in the last ten years and the method.

Year	Amount of Groundwater Extracted	Method of Extraction
2010-2020	Average of 2.5 acres per year	One well on property

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

Overlying water rights to produce and use groundwater.

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

Landscaping use.

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

3           One well with a depth of approximately 257 feet. It is identified as state well  
4 number 04N23W03Q2.

5           6.       The area in which the groundwater has been used.  
6 Landscaping on the property.

7           7.       Any claims for increased or future use of groundwater.  
8 No.

9           8.       The quantity of any beneficial use of any alternative water use that the party  
10 claims as its use of groundwater under any applicable law, including, but no limited to,  
11 Section 105.1, 1005.2, or 1005.4 of the Water Code.

12           Not applicable.

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

15           Oak Haven maintains that it has overlying water rights.

16           10.      The quantity of any replenishment of water to the basis that augmented the  
17 basin's native water supply, resulting from the intentional storage of imported or non-  
18 native water in the basin, managed recharge of surface water, or return flows resulting  
19 from the use of imported water or non-native water on lands overlying the basis by the  
20 party, or the party's representative or agent, during each of the 10 calendar years  
21 immediately preceding the filing of the complaint.

22           N/A

23           11.      The name, addresses, telephone numbers, and email addresses of all  
24 persons possessing information that supports the party's disclosures.

25           Please see response to the first question.

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

27           At this time, no other facts. However, discovery has not yet started and Oak  
28 Haven reserves the right to amend this Response.

Dated: June 1, 2021

KroescheSchindler LLP

By: Lindley Fraley

Eric J. Schindler

Michelle J. Berner, Lindley Fraley

Attorneys for Oak Haven, LLC



## Certificate of Service

I am employed in Orange County, California. I am over the age of 18 and not a party to this action; my business address is 2603 Main St., Suite 200, Irvine, California 92614; direct: 949-387-0495; fax 888-588-0034; email: bvossler@kslaw.legal.

I hereby certify that on June 1, 2021, I served Initial Disclosures on the following parties or counsel of record:

See Attached Service List

☒ Electronic Transmission: By transmission via E-Service to File & ServeXpress to the service list for this matter

☐ By Placing ☐ the original ☐ an accurate copy in sealed envelope(s) to the notification address(es) of record and sending by:

☐ U.S. Mail: I arranged for the envelope(s) to be delivered by first-class mail. I am readily familiar with the firm's practice of collection and processing of First Class Mail. It is deposited with the Postal Service on the same day with postage thereon fully prepaid at Irvine, California in the ordinary course of business and deposited in a mailbox or other like facility regularly maintained by the United States Postal Service.

☐ Overnight Delivery: I arranged for the envelope(s) to be delivered by overnight delivery by close of business of the next business day. I am readily familiar with the firm's practice of collection and processing parcels for overnight carrier. They are deposited with the overnight carrier or at a location authorized to receive parcels on behalf of the overnight carrier on the same day, fully prepaid at Irvine, California in the ordinary course of business.

☐ Personal Delivery: ☐ the original ☐ a true copy thereof to be delivered by hand to the notification address(es) of record by an employee or independent contractor of a registered California process service.

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

Executed on June 1, 2021, in Irvine, Orange County, California.

Name: Brent L. Vossler

Brent L. Vossler  
(Signature)



**Service List**

Dakotah Benjamin Gene Tanaka Sarah Christopher Foley Shawn Hagerty Law Offices of Best Best & Krieger LLP 2001 N. Main Street, Suite 390 Walnut Creek, CA 94596	Attorneys for Respondent and Cross Complainant City of San Buenaventura
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File & ServeXpress	
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