

1 SHAWN HAGERTY, Bar No. 182435
shawn.hagerty@bbklaw.com
2 BEST BEST & KRIEGER LLP
655 West Broadway, 15th Floor
3 San Diego, California 92101
Telephone: (619) 525-1300
4 Facsimile: (619) 233-6118

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

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAR 03 2021

5 CHRISTOPHER M. PISANO, Bar No. 192831
christopher.pisano@bbklaw.com
6 SARAH CHRISTOPHER FOLEY, Bar No. 277223
sarah.foley@bbklaw.com
7 PATRICK D. SKAHAN, Bar No. 286140
patrick.skahan@bbklaw.com
8 BEST BEST & KRIEGER LLP
300 South Grand Avenue, 25th Floor
9 Los Angeles, California 90071
Telephone: (213) 617-8100
10 Facsimile: (213) 617-7480

Sherri R. Carter, Executive Officer/Clerk of Court

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,

Case No. 19STCP01176

18 Petitioner,

Judge: Honorable William F. Highberger

19 v.

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

AMENDMENT NUMBER 2 TO THE CITY
OF BUENAVENTURA'S THIRD AMENDED
CROSS-COMPLAINT TO SUBSTITUTE
TRUE NAMES OF ROE CROSS-
DEFENDANTS (FICTITIOUS NAME, CCP
§474) (RIPARIAN OWNERS)

21 Respondents.

Action Filed: Sept. 19, 2014

Trial Date: Not Set

22 CITY OF SAN BUENAVENTURA, etc.,

23 Cross-Complainant

24 v.

25 DUNCAN ABBOTT, an individual, et al.

26 Cross-Defendants.
27
28

1 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 Upon filing the Verified Third Amended Cross-Complaint herein, Defendant and Cross-
4 Complainant CITY OF SAN BUENAVENTURA, a California municipal, being ignorant of the
5 true names of cross-defendants who are riparian property owners, and having designated such
6 cross-defendants in the Cross-Complaint by fictitious names ROES 1 through 1000, and having
7 discovered the true names of said cross-defendants, hereby amends the Cross-Complaint by
8 inserting such true names in the place and stead of such fictitious names where it appears in said
9 Cross-Complaint, as follows:

NAME	ROE DESIGNATION
10740 Chismahoo LLC, a California limited liability company	Roe 2
11480 Sulphur Mountain Road, LLC, a California limited liability company	Roe 3
Aisholz LLC, a California limited liability company	Roe 4
Joellen Alflen, Trustee of The Joellen Alflen Separate Property Revocable Trust	Roe 5
Hien Dao Andren, Trustee of The Andren Family Trust	Roe 6
Linh T. Andren, individually	Roe 7
Robert Kinglsey Andren, Trustee of The Andren Family Trust	Roe 8
Son T. Andren, individually	Roe 9
Charles H. Andrews III, Trustee of The Andrews Trust	Roe 10
Susan M. Andrews, Trustee of The Andrews Trust	Roe 11

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

NAME	ROE DESIGNATION
Christine J. Bailey, Trustee of The William F. Bailey Living Trust	Roe 12
Rocky J. Baio, individually	Roe 13
Debra Bandy, Trustee of The Bandy Living Trust	Roe 14
Timothy Bandy, Trustee of The Bandy Living Trust	Roe 15
Nicholas F. Barham, individually	Roe 16
Alicia S Beaty, individually	Roe 17
J. Terry Beckett, Trustee of The Beckett Family Trust	Roe 18
Joy Annette Edwards-Beckett, Trustee of The Beckett Family Trust	Roe 19
Kelly Beckett, individually	Roe 20
June Laurie Behar, Trustee of The Behar Living Trust	Roe 21
Sheldon Behar, Trustee of The Behar Living Trust	Roe 22
Carolyn D. Bennett, Trustee of The Bennett Family Trust	Roe 23
James S. Bennett, Trustee of The Bennett Family Trust	Roe 24
Big Bagga Acorns LLC, a California limited liability company	Roe 25
Black Equine Investments, LLC, a California limited liability company	Roe 26
Loa E. Bliss, Trustee of The Loa E. Bliss 2006 Revocable Trust	Roe 27
Boulevard Haussmann LLC, a California limited liability company	Roe 28

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

NAME	ROE DESIGNATION
Ventura County Council of the Boy Scouts of America, a California nonprofit public benefit corporation	Roe 29
Claire S. Brian, Trustee of The Brad & Claire Brian Living Trust	Roe 30
Brad D. Brian, Trustee of The Brad & Claire Brian Living Trust	Roe 31
Robert Brindis, individually	Roe 32
Keith R. Brooks, Trustee of The Keith R. Brooks and Ruth E. Brooks Revocable Trust	Roe 33
Ruth E. Brooks, Trustee of The Keith R. Brooks and Ruth E. Brooks Revocable Trust	Roe 34
Tanny B. Brooks, individually	Roe 35
Bonnie J. Delperdang-Brown, Trustee of The Bonnie J. Delperdang-Brown Trust	Roe 36
Emily V. Brown, Trustee of The Restated Emily V. Brown Intervivos Trust	Roe 37
BT Ranch Ojai, LLC, a California limited liability company	Roe 38
California Department of Parks and Recreation, a division of the State of California	Roe 39
Charles Gene Cantello, Trustee of The Charles Gene and Marilyn J. Cantello Living Trust	Roe 40
Marilyn J. Cantello, Trustee of The Charles Gene and Marilyn J. Cantello Living Trust	Roe 41
Susan K. Capper, Trustee of The Capper Trust Dated August 28, 2003	Roe 42

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

NAME	ROE DESIGNATION
Gordon R Carolin, individually	Roe 43
Ileana Cataldo, Trustee of The Cataldo Family Living Trust	Roe 44
John George Cataldo, Trustee of The Cataldo Family Living Trust	Roe 45
CFC Land Inc., a California corporation	Roe 46
Marsha Kee Strong-Chandler, individually	Roe 47
Bruce Allen Chernof, Trustee of The Chernof/Garcia Living Trust	Roe 48
Chevron U.S.A. Inc., a Pennsylvania corporation	Roe 49
James E. Clark II, Trustee of The James E. Clark II Family Trust	Roe 50
Leslie L. Clark, Trustee of The Leslie L. Clark Trust	Roe 51
Mary Claire Clark, Trustee of The James E. Clark II Family Trust	Roe 52
Catherine A. Collins, individually	Roe 53
Sean D. Collins, individually	Roe 54
Pamela Cooke, Successor Trustee of The Cooke Family Trust	Roe 55
Edward J. Conner, Trustee of The Edward J. Conner Trust	Roe 56
Angela Courtin, individually	Roe 57
Joseph Davy, individually	Roe 58
Patricia A. Davy, individually	Roe 59
Tracey Davy, individually	Roe 60
Lauren Deneen, individually	Roe 61

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

NAME	ROE DESIGNATION
Paul Deneen, individually	Roe 62
Valerie Anne Giscard D'Estaing, Trustee of The Fixot-Giscard D'Estaing Family Trust	Roe 63
Patricia Clark Doerner, Trustee of The Richard E. Doerner and Patricia Clark Doerner 2003 Family Trust	Roe 64
Richard Doerner, Trustee of The Richard E. Doerner and Patricia Clark Doerner 2003 Family Trust	Roe 65
Joaquin Dominguez, individually	Roe 66
Tray R Droop, individually	Roe 67
Niall Donnelly, individually	Roe 68
Donald Dufau, Trustee of The Donald D. Dufau Family Trust	Roe 69
Roberta Dufau, Trustee of The Donald D. Dufau Family Trust	Roe 70
Jennifer Eckersley, Trustee of The John Scott and Jennifer Jane Eckersley 2004 Family Trust	Roe 71
John Eckersley, Trustee of The John Scott and Jennifer Jane Eckersley 2004 Family Trust	Roe 72
Kathy Entzel, Trustee of The Entzel Trust	Roe 73
Nathan Entzel, Trustee of The Entzel Trust	Roe 74
Mary A Ertl, individually	Roe 75
Maria Olimpia Feig, Trustee of The Steve and Maria Feig Living Trust	Roe 76
Steven Norman Feig, Trustee of The Steve and Maria Feig Living Trust	Roe 77

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

NAME	ROE DESIGNATION
Bernard Fixot, Trustee of The Fixot-Giscard D'Estaing Family Trust	Roe 78
Janet K. Fredrick, Trustee of The Fredrick Family Marital Trust and Fredrick Family Exemption Trust	Roe 79
Carl Fout, Trustee of The Carl Fout 2018 Trust	Roe 80
Richard Franklin, Trustee of The Richard E. Franklin and Yvette M. Franklin Revocable Trust	Roe 81
Yvette Franklin, Trustee of The Richard E. Franklin and Yvette M. Franklin Revocable Trust	Roe 82
W. Eric Fulton, Trustee of The Elizabeth Mazell Trust	Roe 83
Mandy K. Gaddie, individually	Roe 84
William E. Gaddie II, individually	Roe 85
Joseph Gamm, Trustee of The Joseph Gamm and Victoria J. Gamm Revocable Trust	Roe 86
Victoria J. Gamm, Trustee of The Joseph Gamm and Victoria J. Gamm Revocable Trust	Roe 87
Norman B. Garber, individually	Roe 88
Daniel Garcia, Trustee of The Chernof/Garcia Living Trust	Roe 89
Manuel A. Garcia, Trustee of The Sulphur Mountain Ranch Trust	Roe 90
Stephen J. Garcia, Trustee of The Sulphur Mountain Ranch Trust	Roe 91
Gloria Gerace, individually	Roe 92

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

NAME	ROE DESIGNATION
Benjamin Gilbert, individually	Roe 93
David A. Gilbert, Trustee of The Loa E. Bliss 2006 Revocable Trust	Roe 94
Aletheia Gooden, Trustee of The Quick/Gooden Family Trust	Roe 95
Robert L. Goddard, individually	Roe 96
Moshe Graber, Trustee of The Rain Trust	Roe 97
Gail Graham, individually	Roe 98
Zachary W. Griffin, III, Trustee of The Zachary W. Griffin, III Living Trust	Roe 99
Gerrold Grigsby, individually	Roe 100
Karen Grigsby, individually	Roe 101
Guadalupe Guzman, individually	Roe 102
Ofelia E. Guzman, individually	Roe 103
James Hall, individually	Roe 104
Marcia Hall, individually	Roe 105
Hammond Canyon I, LLC, a California corporation	Roe 106
Ralph Hansen, individually	Roe 107
Sandra Hansen, individually	Roe 108
Happy Valley Foundation, a California corporation	Roe 109
Jana C. Hedman, Trustee of The Hedman Trust	Roe 110
Ira Paul Heilveil, Trustee of The Heilveil Family Trust	Roe 111

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

NAME	ROE DESIGNATION
Marsha Jeanne McKeon Heilveil, Trustee of The Heilveil Family Trust	Roe 112
C.B. Heller, Trustee of The Heller Family Trust	Roe 113
Miranda Heller, Trustee of The Heller Family Trust	Roe 114
Jennie Hilliger, Trustee of The Jorgenson Estate Trust	Roe 115
Holguin Family Ventures, LLC, a California limited liability company	Roe 116
Brian E. Holly, individually	Roe 117
Camille Carlson-Holly, individually	Roe 118
Douglas J. Homze, individually	Roe 119
Sharon M. Homze, individually	Roe 120
Helen Huyler, individually	Roe 121
Amira J. Ingram, individually	Roe 122
Arthur T. Jarvis III, Trustee of The Arthur T. Jarvis III Separate Property Trust	Roe 123
Jessica Jeffrey, individually	Roe 124
JLA, LLC, a Delaware limited liability company	Roe 125
Jonesy-B Limited Partnership, a California limited partnership	Roe 126
Domlin A. Juul, Trustee of The Domlin A. Juul Trust	Roe 127
Paula Kaiser, individually	Roe 128
Thomas Kaiser, individually	Roe 129
Soheila Kolahi, individually	Roe 130

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

NAME	ROE DESIGNATION
David Laag, Successor Trustee of The Arthur E. Laag Family 1978 Trust	Roe 131
Elizabeth Anne Lane, Trustee of The Moody/Lane Family Trust	Roe 132
Beverly L. Lanning, Trustee of The Lanning Family Survivor's Trust	Roe 133
Eugene Larson, Trustee of The Larson Living Trust	Roe 134
Jacqueline Larson, Trustee of The Larson Living Trust	Roe 135
Steven A Lasiter, individually	Roe 136
John Lee, individually	Roe 137
Gail M. Light, individually	Roe 138
Michael T. Lindsay, individually	Roe 139
Susan L. Lindsay, individually	Roe 140
Catherine M. Logan, Successor Trustee of The Feeney Family Trust	Roe 141
Gunnar Lovelace, Trustee of The Gunnar Lovelace Revocable Trust	Roe 142
John Lee, individually	Roe 143
Richard C. Loy, Trustee of The Loy Family Trust	Roe 144
Virginia N. Loy, Trustee of The Loy Family Trust	Roe 145
Robin Luttenberger, individually	Roe 146
Linda J.G. MacDougall, Trustee of The Linda J.G. MacDougall Living Trust	Roe 147
Elizabeth Mallinson, Trustee of The Mallinson-Temmel Living Trust	Roe 148

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

NAME	ROE DESIGNATION
Mike Marietta, Trustee of The Marietta Living Trust	Roe 149
Michelle Mason, individually	Roe 150
Matilija Canyon Properties, a California limited partnership	Roe 151
Matilija Center, LLC, a California limited liability company	Roe 152
Matilija Investment Property, LLC	Roe 153
Dominick McCormick, Trustee of The Dominick and Stefanie McCormick Trust	Roe 154
Stefanie McCormick, Trustee of The Dominick and Stefanie McCormick Trust	Roe 155
Meditation Groups, Inc., a California non-profit public benefit corporation	Roe 156
Meher Mount Corporation, a California corporation	Roe 157
Baulio Mejia, individually	Roe 158
Rosamaria Mejia, individually	Roe 159
Curtis Menefee, individually	Roe 160
Violette Menefee, individually	Roe 161
Lisane S. Menezes, Trustee of The Menezes Community Property Trust	Roe 162
Voltaire Gustavo K. Menezes, Trustee of The Menezes Community Property Trust	Roe 163
Justin M Mesker, individually	Roe 164
John Minkel, individually	Roe 165
Theresa Minkel, individually	Roe 166
Thomas Molyneux, individually	Roe 167

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

NAME	ROE DESIGNATION
Thomas Mone, individually	Roe 168
Joel Alan Moody, Trustee of The Moody/Lane Family Trust	Roe 169
Bethany A. Moore, individually	Roe 170
Juan J. Morales, individually	Roe 171
Bradley A. Morrice, individually	Roe 172
Walter W. Mosher, Jr, Trustee of The Walter W. Mosher, Jr. Living Trust	Roe 173
Walter W. Mosher, Jr., individually	Roe 174
Rebecca Mosher, individually	Roe 175
Suzanne Naegle, Trustee of The Sue Naegle 2018 Trust	Roe 176
New Civilization, a California corporation	Roe 177
Ojai Valley School, a California corporation	Roe 178
Linda F. Olive, Trustee of The Linda F. Olive 2017 Trust	Roe 179
Joanne P. Oslund, individually	Roe 180
Kevin G. Oslund, individually	Roe 181
G. Oviatt, individually	Roe 182
Phyllis J. Oviatt, individually	Roe 183
Jodie Suzanne Ozatar, Trustee of The California Ozatar Family Trust	Roe 184
Michael Ray Ozatar, Trustee of The California Ozatar Family Trust	Roe 185
Johnny Park, individually	Roe 186
Iiona M. Pecel, Trustee of The Pecel Trust	Roe 187

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

NAME	ROE DESIGNATION
John L. Pecel, Trustee of The Pecel Trust	Roe 188
Deborah B. Perry, individually	Roe 189
Justin Peters, individually	Roe 190
Stacey Peters, individually	Roe 191
Ngoc T. Petrarca, individually	Roe 192
Emily Wilson Prather, Trustee of The Frank Lee Prather and Emily Wilson Prather Family Trust	Roe 193
Frank Lee Prather, Trustee of The Frank Lee Prather and Emily Wilson Prather Family Trust	Roe 194
Jan Preiczner, individually	Roe 195
Louis Preiczner, individually	Roe 196
Michael W. Price, Trustee of The Michael W. Price Trust	Roe 197
Emmanuelle Pytka, individually	Roe 198
Trevor Quirk, Trustee of The Quick/Gooden Family Trust	Roe 199
Ellen Rakieten, individually	Roe 200
Rancho Dos Rios, LLC, a California limited liability company	Roe 201
Paul J. Reep, Trustee of The Reep Family Trust	Roe 202
Sheila Reep, Trustee of The Reep Family Trust	Roe 203
Andra Rich, Trustee of The Andrea Rich Living Trust	Roe 204
Jason Robinson, individually	Roe 205

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

NAME	ROE DESIGNATION
Richard Holt Robinson, individually	Roe 206
Shane Robinson, individually	Roe 207
Christel Rogero, individually	Roe 208
Larry Rogero, individually	Roe 209
Richard Wayne Roll, Trustee of The Richard Wayne Roll and Susan Geisel Roll Revocable 2004 Trust	Roe 210
Susan Geisel Roll, Trustee of The Richard Wayne Roll and Susan Geisel Roll Revocable 2004 Trust	Roe 211
Robin K. Roy, Trustee of The RZF Trust	Roe 212
Rush Family Limited Partnership, a California limited partnership	Roe 213
James Jay Seltenreich, Trustee of The Seltenreich Family Trust	Roe 214
Janice Seltenreich, Trustee of The Seltenreich Family Trust	Roe 215
Nancy Seltzer, Trustee of The Nancy Seltzer Living Trust	Roe 216
Seneca Gardens Limited, a California limited partnership	Roe 217
Sandra Shinall, individually	Roe 218
Frederick M. Silvers, individually	Roe 219
Alireza Sizdahkhani, individually	Roe 220
Tabandeh Sizdahkhani, individually	Roe 221
Amir Mansour Shahparaki, Trustee of The 2009 Amir Mansour Shahparaki and Jean Alice Hamilton Welsh Revocable Trust	Roe 222


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

NAME	ROE DESIGNATION
Larry J. Shellnut, Trustee of The Shellnut Trust	Roe 223
Margaret R. Shellnut, Trustee of The Shellnut Trust	Roe 224
Sheron LLC, a California limited liability company	Roe 225
Eitan Sloustcher, individually	Roe 226
Sara Sloustcher, individually	Roe 227
Bradley W. Smith, individually	Roe 228
Robert Smith, individually	Roe 229
Stacy Smith, individually	Roe 230
Stephen Temmel, Trustee of The Mallinson-Temmel Living Trust	Roe 231
Marjorie Tezak, individually	Roe 232
Elisabeth K. Treadwell, individually	Roe 233
Alexander Treadwell, individually	Roe 234
Tropico (2004), LLC, a Delaware limited liability company	Roe 235
John T. Vangel, Trustee of The Vangel Trust	Roe 236
Ysabel Vega, individually	Roe 237
Ventura Industrial Properties II, LLC, a California limited liability company	Roe 238
Karon O. Vereen, individually	Roe 239
VMHP L.P., a California limited partnership	Roe 240
Charles L. Ward III, Co-Trustee of The Ward-Lombardo Living Trust	Roe 241

NAME	ROE DESIGNATION
Jean Marie Webster, Trustee of The Roger E. and Jean-Marie Webster Trust	Roe 242
Roger E. Webster, Trustee of The Roger E. and Jean-Marie Webster Trust	Roe 243
Jean Alice Hamilton Welsh, Trustee of The 2009 Amir Mansour Shahparaki and Jean Alice Hamilton Welsh Revocable Trust	Roe 244
Dura Milton Williams, Trustee of The Dura Milton Williams and Honor Elizabeth Bliss-Williams Living Trust	Roe 245
Honor Elizabeth Bliss-Williams, Trustee of The Dura Milton Williams and Honor Elizabeth Bliss-Williams Living Trust	Roe 246
Robert L. Yanez, Trustee of The Robert L. Yanez Trust	Roe 247
Susan Young, individually	Roe 248
Catherine R. Zoi, Trustee of The RZF Trust	Roe 249

Dated: March 3, 2021

BEST BEST & KRIEGER LLP

By: 
 SHAWN HAGERTY
 CHRISTOPHER M. PISANO
 SARAH CHRISTOPHER FOLEY
 PATRICK D. SKAHAN
 Attorneys for Respondent and
 Cross-Complainant
 CITY OF SAN BUENAVENTURA