



1 Patrick T. Loughman, SBN 105990
2 Name of Owner/Cross-Defendant/Attorney

3 Cristian R. Arrieta, SBN 236837
4 Address
5 Lowthorp Richards McMillan Miller & Templeman
6 300 E. Esplanade Drive, Suite 850
7 Oxnard, CA 93036

8 (805) 981-8555
9 Phone Number
10 ploughman@lrmmmt.com; carrieta@lrmmmt.com
11 Email Address

12 Attorneys for Cross-Defendant, TICO MUTUAL WATER COMPANY

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES

15 SANTA BARBARA CHANNELKEEPER,
16 a California non-profit corporation,

17 Petitioner,

18 v.

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

21 Respondents.

22 CITY OF SAN BUENAVENTURA, etc.,

23 Cross-Complainant

24 v.

25 DUNCAN ABBOTT, an individual, et al.

26 Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

Year	Amount of Groundwater Extracted:	Method of Extraction:
2011	529491	Well pump
2010	missing records	Well pump

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

Water rights attendant to fee ownership of shareholders.

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

Provide potable water to residents in our district.

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

APN 032-0-120-040

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6. The area in which the groundwater has been used.

Within our district's boundaries. APN 032-0-120-040.

7. Any claims for increased or future use of groundwater.

Not at this time.

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

None.

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

Not applicable.

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

Year	Quantity of replenishment of water
2019	None.
2018	None.
2017	None.
2016	None.
2015	None.
2014	None.
2013	None.
2012	None.
2011	None.
2010	None.

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


- (a) Name: Frances Fitting
- (b) Address: 1790 S. Rice Road, Ojai, CA 93023-3806
- (c) Phone Number: (805) 646-5996; (805) 397-9845
- (d) Email Address: ffitting@sbcglobal.net

- (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. Cross Defendant reserves the right to amend/supplement this disclosure based on further discovery and research.

Dated: June 29, 2021



 SIGNATURE
 Frances Fitting (Secretary/Treasurer/WDO)
 [CROSS DEFENDANT NAME]
 for Tico Mutual Water Company

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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 treasurer and secretary of Tico Mutual Water Co., 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] Ojai, 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.

Frances Fitting
[TYPE NAME HERE] Frances Fitting
Secretary/Treasurer/WDO
Tico Mutual Water Company

LOWTHORP RICHARDS
ATTORNEYS AT LAW
VENTURA COUNTY

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF VENTURA

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action. My business address is 300 East Esplanade Drive, Suite 850, Oxnard, California 93036.

On July 1, 2021, I served the foregoing document(s) described as VERIFIED INITIAL DISCLOSURES on the interested parties in this action, by placing the original X a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

X (BY E-SERVICE VIA FILE & SERVE XPRESS): by causing a true copy thereof to be transmitted by E-Service via File & Serve Xpress to the person(s) set forth below.

 (BY FIRST CLASS MAIL) (BY EXPRESS MAIL) I caused such envelope with postage thereon fully prepared to be placed in the United States mail at Ventura, California. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

 (BY PERSONAL SERVICE) I delivered such envelope by hand to the office of the addressee.

 (EMAIL): by causing a true copy thereof to be emailed to the person or office, as indicated, at the email address(es) set forth above.

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 1, 2021, at Oxnard, California.



DARLENE ARIAS

SERVICE LIST

<p>1 2 3 Daniel Cooper Sycamore Law 4 1004 O'Reilly Ave. San Francisco, CA 94129 5 daniel@sycamore.law 6 Attorneys for Petitioner and Plaintiff Santa Barbara Channelkeeper 7 8</p>	<p>Matthew Bullock Deputy Attorney General California Department of Justice Natural Resources Law Section 455 Golden Gate Ave., Suite 11000 San Francisco, CA 94102-7004 matthew.bullock@doj.ca.gov Attorneys for Respondent and Defendant State Water Resources Control Board</p>
<p>9 Shawn Hagerty, Esq. BEST BEST & KRIEGER 10 655 West Broadway, 15th Floor San Diego, CA 92101 11 shawn.hagerty@bbklaw.com 12 Attorneys for Respondent and Cross- complainant City of San Buenaventura 13</p>	<p>Christopher M. Pisano, Esq. Sarah Foley, Esq. BEST BEST & KRIEGER 300 S. Grand Ave., 25th Floor Los Angeles, CA 90071 christopher.pisano@bbklaw.com sarah.foley@bbklaw.com Attorneys for Respondent and Cross- complainant City of San Buenaventura</p>
<p>14 Marc N. Melnick Deputy Attorney General's Office 15 1515 Clay Street, 20th Floor P.O. Box 70550 16 Oakland, CA 94612-0550 marc.melnick@doj.ca.gov 17 Attorneys for Respondent and Defendant 18 State Water Resources Control Board 19 20</p>	<p>Eric M. Katz Supervising Deputy Attorney General Noah Golden-Krasner Deputy Attorney General Carol Boyd, Deputy Attorney General 300 South Spring Street, Suite 1702 Los Angeles, CA 90013 eric.katz@doj.ca.gov noah.goldenrasner@doj.ca.gov carol.boyd@doj.ca.gov Attorneys for Proposed Intervenor California Department of Fish & Wildlife</p>
<p>21 Peter Goldenring Mark Pachowicz 22 PACHOWICZ GOLDENRING, APC 6050 Seahawk Street 23 Ventura, CA 93003-6622 peter@pglaw.law 24 mark@pglaw.law 25 Attorneys for Cross-defendant 26 The Manfred Krankl and Elaine V. Krankl Living Trust 27 28</p>	<p>Edward J. Casey Clynton Namuo Alston & Bird LLP 333 South Hope Street, 16th Floor Los Angeles, CA 90071 ed.casey@alston.com clynton.namuo@alston.com Attorneys for Cross-defendants Bentley Family Limited Partnership and AGR Breeding, Inc.</p>

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<p>Ryan Blatz Ryan Blatz Law 109 N. Blanche Street, Suite 103 Ojai, CA 93023 ryan@ryanblatzlaw.com</p> <p>Attorney for Cross-defendants Troy Becker; Joe Clark; Michael Cromer; Linda Epstein; Etchart Ranch; Stephen Mitchell; Rudd Ranch, LLC; Soule Park Golf Course, Ltd; Victor Timar; John Town; Trudie Town</p>	<p>William G. Short, Esq. Law Offices of William G. Short P.O. Box 1313 Ojai, CA 93024-1313 billshortesq@me.com</p> <p>Attorney for Cross-defendant Robin Bernhoft</p>
<p>Anthony Lee Francois Jeremy Talcott David Deerson Pacific Legal Foundation 930 G Street Sacramento, CA 95814-1802 alf@pacificalegal.org tfrancois@pacificalegal.org jtalcott@pacificalegal.org ddeerson@pacificalegal.org</p> <p>Attorneys for Cross-defendant Robin Bernhoft</p>	<p>Robert N. Kwong Dennis O. La Rochelle Arnold Larochelle Mathews Vanconas & Zirbel, LLP 300 Esplanade Dr., Suite 2100 Oxnard, CA 93036 rkwong@atozlaw.com</p> <p>Attorneys for Cross-defendant Casitas Municipal Water District</p>
<p>Paul B. Blatz BLATZ LAW FIRM 206 N. Signal Street, Suite G Ojai, CA 93023 Email: blatzlawfirm@gmail.com</p>	<p>Gregory J. Patterson Musick, Peeler & Garrett LLP 2801 Townsgate Road, Suite 200 Westlake Village, CA 91361 g.patterson@musickpeeler.com</p> <p>Attorney for Cross-defendants Robert C. Davis, Jr.; James Finch; Friend's Ranches, Inc.; Topa Topa Ranch Company, LLC; The Thacher School; Thacher Creek Citrus, LLC</p>
<p>Lindsay F. Nielson Law Office of Lindsay F. Nielson 845 E. Santa Clara Street Ventura, CA 93001 nielsonlaw@aol.com</p> <p>Attorney for Cross-defendant Meiners Oaks Water District and Ventura River Water District</p>	<p>Jeanne Zolezzi Herum Crabtree Suntag 5757 Pacific Avenue, Suite 222 Stockton, CA 95207 jzolezzi@herumcrabtree.com</p> <p>Attorney for Cross-defendants Meiners Oaks Water District and Ventura River Water District</p>

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<p>Neal P. Maguire Ferguson Case Orr Patterson LLP 1050 South Kimball Road Ventura, CA 93004 nmaguire@fcoplaw.com</p> <p>Attorneys for Cross-defendants Rancho Matilija Mutual Water Company; Bettina Chandler, Trustee of the Bettina Chandler Trust</p>	<p>Thomas S. Bunn III Elsa Sham Lagerlof Senecal Gosney & Kruse LLP 301 N. Lake Ave., 10th Floor Pasadena, CA 91101-5123 tombunn@lagerlof.com esham@lagerlof.com</p> <p>Attorneys for Cross-defendant St. Joseph's Associates of Ojai, California, Inc.</p>
<p>Michael J. Van Zandt Nathan A. Metcalf Sean G. Herman Hason Bridgett LLP 425 Market Street, 26th Floor San Francisco, CA 94105 mvanzandt@hansonbridgett.com nmetcalf@hansonbridgett.com sherman@hansonbridgett.com</p> <p>Attorneys for Cross-defendants Ventura County Watershed Protection District and County of Ventura</p>	<p>Alberto Boada Karen V. Marble Ventura County Counsel's Office 800 South Victoria Avenue Ventura, CA 93009 alberto.boada@ventura.org karen.marble@ventura.org</p> <p>Attorneys for Cross-defendants Ventura County Watershed Protection District and County of Ventura</p>
<p>Scott Slater Bradley Herrema Christopher Guillen Brownstein Hyatt Farber Schreck LLP 1021 Anacapa Street, 2nd Floor Santa Barbara, CA 93101 sslater@bhfs.com eguillen@bhfs.com</p> <p>Attorneys for Cross-defendant Wood-Claeyssens Foundation</p>	<p>Joseph C. Chrisman Hathaway, Perrett, Webster, Powers, Chrisman & Gutierrez 5450 Telegraph Road Ventura, CA 93003 jchrisman@hathawaylawfirm.com</p> <p>Attorney for Cross-defendant Wood-Claeyssens Foundation</p>
<p>David B. Cosgrove Jeffrey M. Oderman Douglas J. Dennington Jeremy N. Jungreis Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400 Costa Mesa, CA 92626-1931 dcosgrove@rutan.com joderman@rutan.com ddennington@rutan.com jjungreis@rutan.com</p> <p>Attorneys for Cross-defendant Casitas Municipal Water District</p>	<p>Thomas E. Jeffry Debra J. Albin-Riley Stefan Bogdanovich Arent Fox LLP 555 West Fifth Ave., 48th Floor Los Angeles, CA 90013-1065 thomas.jeffry@arentfox.com stefan.bogdanovich@arentfox.com</p> <p>Attorneys for Cross-defendant Community Memorial Health System</p>

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<p>Andrew Brady DLA Piper LLP (US) 550 South Hope Street, Suite 2400 Los Angeles, CA 90071-2618 andrew.brady@us.dlapiper.com</p> <p>Attorney for Cross-defendant Integritas Ojai, LLC</p>	<p>Jennifer T. Buckman Andrew J. Ramos Holly Jacobson Bartkiewicz Kronick & Shanahan, PC 1011 Twenty-Second Street Sacramento, CA 95816-4907 jtb@bkslawfirm.com hjj@bkslawfirm.com</p> <p>Attorneys for Cross-defendant City of Ojai</p>
<p>David R. Krause-Leemon Beaudoin & Krause-Leemon LLP 15165 Ventura Blvd., Suite 400 Sherman Oaks, CA 91403 david@bk-llaw.com</p> <p>Attorney for Cross-defendant RDK Land, LLC</p>	<p>Eric J. Schindler Michelle J. Berner Kroesche Schindler LLP 2603 Main Street, Suite 200 Irvine, CA 92614 eschindler@kslaw.legal mberner@kslaw.legal</p> <p>Attorneys for Cross-defendant Oak Haven, LLC</p>
<p>Brian A. Osborne Osborne Law Firm 674 County Square Drive, Suite 308 Ventura, CA 93003 osbornelawyer@gmail.com</p> <p>Attorney for Cross-defendants Brian A. Osborne; Ronald W. Rood and Susan B. Rood, Trustees of the Rood Family Trust</p>	<p>Adam D. Wieder Barry C. Groveman Groveman Hiete LLP 35 East Union Street, Suite B Pasadena, CA 91103 awieder@grovemanhiete.com bgroveman@grovemanhiete.com</p> <p>Attorneys for Cross-defendants Michael Bradbury; Heidi Bradbury; and The Heidi Grankow Trust</p>
<p>Hermitage Mutual Water Company Attn: J. Roger Essick 2955 Hermitage Road Ojai, CA 93023 rogeressick@gmail.com</p>	<p>Ernest J. Guadiana Elkins Kalt Weintraub Reuben Gartside LLP 10345 W. Olympic Blvd., Los Angeles, CA 90064 eguadiana@elkinskalt.com</p> <p>Specially appearing for Michel Lombardo and Charles L. Ward III, as Co-Trustees of the Ward-Lombardo Living Trust</p>
<p>Julie A. Baker 2193 Maricopa Hwy. Ojai, CA 93023 jandjbaker2@gmail.com</p>	<p>The Joseph Fedele 1995 Living Trust, Oriana Marie Fedele, Trustee Attn: Oriana Fedele P.O. Box 298 Lahaina, HI 96767 orianafedele@gmail.com</p>

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<p>T&D Nevada Trust Dennis and Antoinette Mitchell Mitchell Homes Inc. P.O. Box 360 Ojai, CA 93024 amitc74383@aol.com</p>	<p>Michaela Boehm 12293 Topa Lane Santa Paula, CA 93060 micoehm@me.com</p>
<p>Anthonie M. Voogd 918 Palomar Road Ojai, CA 93023 avoogd@stanfordalumni.org</p>	<p>Lawrence S. Mihalas Trustees of the Mihalas Family Trust 419 21st Place Santa Monica, CA 90402 lmihalas@gmail.com lmihalas@ucla.edu</p>
<p>Heather Blair 556 So. Fair Oaks Ave, Suite 101 Box 356 Pasadena, CA 91105 hblair1946@gmail.com</p>	<p>Martin Hartmann Whitney Hartmann 430 S. Carrillo Road Ojai, CA 93023 earthbuilding@gmail.com</p>
<p>Robert K. Cartin Cartin Family LLC 505 Estremoz Ct. Oceanside, CA 92057 bob-cartin@dvm.com</p>	<p><u>Via First Class Mail</u> Del Cielo LLC Attn: Tim Carey, Managing Member 22410 Hawthorne, #5 Torrance, CA 90505</p>