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Attorneys for Cross-Defendant  
CITY OF OJAI

***\*\*\*Exempt from Filing Fees  
Gov. Code, § 6103***

SUPERIOR COURT FOR 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 BUENA VENTURA,

Respondents.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

**CITY OF OJAI'S REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT OF  
MOTION FOR JUDGMENT ON THE  
PLEADINGS**

**Date: January 18, 2022**

**Time: 1:30 pm**

**Dept: 10**

**310 North Spring Street  
Los Angeles, CA 90012**

Action Filed: September 19, 2014

First Amended Complaint Filed:  
September 7, 2018

CITY OF SAN BUENAVENTURA, a  
California municipal corporation,

Cross-Complainant,

v.

DUNCAN ABBOTT;  
AGR BREEDING, INC; et al.

{00261663.1}

CITY OF OJAI'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR JUDGMENT ON  
THE PLEADINGS

Respondent requests judicial notice of the documents and facts contained therein as identified below in support of its motion for judgment on the pleadings. This request is made pursuant to Evidence Code sections 452 and 453 and the relevant case law below.

The Code of Civil Procedure authorizes the court to consider, as grounds for a motion for judgment on the pleadings, any matter which the court must or may judicially notice under Evidence Code §§ 451 or 452. (Code Civ. Proc. § 438(d).) The court may take notice of regulations and legislative enactments and official acts of any state, county or federal legislative, executive or judicial department. (Evid. Code § 452(b)-(c); *see Fowler v. Howell* (1996) 42 Cal.App.4th 1746, 1750 [court can take judicial notice of records and files of state administrative agencies]; *Trinity Park, L.P. v. City of Sunnyvale* (2011) 193 Cal.App.4th 1014. [court may take judicial notice of official resolutions, reports, and other official acts].) The court may also take notice of the records of any court of this state. (Evid. Code § 452(d).)

Additionally, the court may take judicial notice of “[f]acts and propositions that are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.” (Evid. Code § 452(h).) The court shall take judicial notice of any matter specified in Evidence Code § 452 if a party requests it and gives the adverse party sufficient notice to prepare to meet the request and furnishes the court with sufficient information to enable it to take judicial notice of the matter. (Evid. Code § 453)

Pursuant to the legal authorities identified above, Respondent requests the Court take judicial notice of the following records:

1. City of San Buenaventura’s summons and third amended cross-complaint, titled “Defendant and Cross-Complainant City of San Buenaventura, a California Municipal Corporation’s (Incorrectly Named as City of Buenaventura, A California Municipal Corporation), Third Amended Cross-Complaint,” attached hereto as **Exhibit A**. Judicial notice is also requested as to the relevant date of filing, the parties, and the allegations contained within this pleading.
2. City of San Buenaventura’s first amended cross-complaint, titled “Defendant and Cross-Complainant City of San Buenaventura, a California Municipal Corporation’s



(Incorrectly Named as City of Buenaventura, A California Municipal Corporation), First Amended Cross-Complaint,” attached hereto as **Exhibit B**. Judicial notice is also requested as to the relevant date of filing, the parties, and the allegations contained within this pleading which are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.

3. Santa Barbara Channelkeeper’s motion to strike City of San Buenaventura’s first amended cross-complaint, titled “Notice of Motion: Motion to Strike First Amended Cross-Complaint,” attached hereto as **Exhibit C**. Judicial notice is also requested as to the relevant date of filing, the parties, and the issues related to the motion which are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy, but not the legal conclusions stated therein.
4. Santa Barbara Channelkeeper’s Memorandum of Points and Authorities, titled “Points and Authorities in Support of Santa Barbara Channelkeeper’s Motion to Strike First Amended Cross Complaint,” attached hereto as **Exhibit D**. Judicial notice is also requested as to the relevant date of filing, the parties, and the issues related to the motion which are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy, but not the legal conclusions stated therein.
5. The court’s “Order Striking the City of Buenaventura’s First Amended Complaint,” attached hereto as **Exhibit E**. Judicial notice is also requested as to the relevant date of filing and the findings contained within the Order which is relevant to the issues on appeal and not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy
6. This Court’s Order Establishing Watershed and Basin Boundaries. A copy of the draft Proposed Order provided by Ventura on December 15, 2021 is attached hereto as **Exhibit F**. Ojai understands that the language in the draft Order may change slightly

1 before it is provided to the Court but because the final draft had not been presented to  
2 the court at the time of filing, Ojai could not provide the same in support of its moving  
3 papers. Ojai requests judicial notice of the facts stated within the draft Order relating  
4 to the description and location of the groundwater basin boundaries within the draft  
5 Order as determined by the Court on or about December 9, 2021 and December 13,  
6 2021 which are not reasonably subject to dispute and are capable of immediate and  
7 accurate determination by resort to sources of reasonably indisputable accuracy.

- 8 7. Copy of Bulletin 118 – Update 2020, basin boundaries description for the 4-2 Ojai  
9 Valley Groundwater Basin, as **Exhibit G** available at [https://og-production-open-  
10 data-cnra-892364687672.s3.amazonaws.com/resources/e31251c6-8c95-47fe-95d5-  
11 79f589318326/4-002\\_ojai-  
12 valley\\_basinboundarydescription.pdf?Signature=WvEZ4wUBO42Gg3cntStU7s03j  
13 %2BU%3D&Expires=1639878179&AWSAccessKeyId=AKIAJJIENTAPKHZMIP  
14 XQ](https://og-production-open-data-cnra-892364687672.s3.amazonaws.com/resources/e31251c6-8c95-47fe-95d5-79f589318326/4-002_ojai-valley_basinboundarydescription.pdf?Signature=WvEZ4wUBO42Gg3cntStU7s03j%2BU%3D&Expires=1639878179&AWSAccessKeyId=AKIAJJIENTAPKHZMIPXQ). Judicial notice is also requested as to the facts stated therein which are not  
15 reasonably subject to dispute and are capable of immediate and accurate  
16 determination by resort to sources of reasonably indisputable accuracy.
- 17 8. Judicial notice is requested as to the fact that California Water Code section 10720.8  
18 does not list the Ojai groundwater basin as an adjudicated area and this is a fact not  
19 reasonably subject to dispute and is capable of immediate and accurate determination  
20 by resort to sources of reasonably indisputable accuracy.
- 21 9. Judicial notice is requested as to the fact that OBGMA is in the process of developing  
22 and submitting its groundwater sustainability plan (GSP) for the Ojai groundwater  
23 basin and this is a fact not reasonably subject to dispute and is capable of immediate  
24 and accurate determination by resort to sources of reasonably indisputable accuracy.
- 25  
26  
27  
28

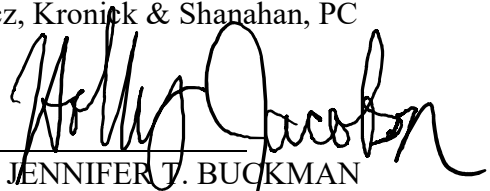
1 Respectfully submitted,

2  
3 Dated: December 20, 2021

Respectfully submitted,

Bartkiewicz, Kronick & Shanahan, PC

By: \_\_\_\_\_

  
JENNIFER T. BUCKMAN  
HOLLY J. JACOBSON  
Attorneys for CITY OF OJAI,

# Exhibit A

**SUMMONS**  
**Cross-Complaint**  
**(CITACION JUDICIAL-CONTRADEMANDA)**

**NOTICE TO CROSS-DEFENDANT:**  
**(AVISO AL CONTRA-DEMANDADO):**

See attachment.

**DUNCAN ABBOTT**

**YOU ARE BEING SUED BY CROSS-COMPLAINANT:**  
**(LO ESTÁ DEMANDANDO EL CONTRADEMANDANTE):**

**CITY OF SAN BUENAVENTURA, a California municipal corporation,**

FOR COURT USE ONLY  
 (SOLO PARA USO DE LA CORTE)

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

**JAN 02 2020**

Sherri R. Carter, Executive Officer/Clerk  
 By: Tanya Herrera, Deputy

You have 60 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the cross-complainant. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

**Tiene 60 DÍAS DE CALENDARIO** después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al contrademandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), o uniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of Los Angeles  
 Spring Street Court House  
 312 N. Spring Street, Los Angeles, California 90012

SHORT NAME OF CASE (from Complaint): (Nombre de Caso):

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.

CASE NUMBER: (Número del Caso):

19STCP01176

The name, address, and telephone number of cross-complainant's attorney, or cross-complainant without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del contrademandante, o del contrademandante que no tiene abogado, es):

Gene Tanaka, SBN 101423/Sarah Christopher Fein, SBN 277223/Dakotah Benjamin, SBN 316446  
 Best Best & Krieger LLP, 2001 N. Main Street, Suite 390, Walnut Creek, CA 94596; Tel. (925) 977-3300

DATE:

(Fecha)

**JAN 02 2020**

Clerk, by

(Secretario)

Deputy

(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons (POS-010).)

**NOTICE TO THE PERSON SERVED: You are served**

1. ☐ as an individual cross-defendant.

2. ☐ as the person sued under the fictitious name of (specify):

3. ☐ on behalf of (specify):

under: ☐ CCP 416.10 (corporation)

☐ CCP 416.20 (defunct corporation)

☐ CCP 416.40 (association or partnership)

☐ other (specify):

4. ☐ by personal delivery on (date):

☐ CCP 416.60 (minor)

☐ CCP 416.70 (conservatee)

☐ CCP 416.90 (authorized person)

(SEAL)

SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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**INSTRUCTIONS FOR USE**

- ➔ This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- ➔ If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

**List additional parties** (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

DUNCAN ABBOTT; AGR BREEDING, INC.; ASQUITH FAMILY LIMITED PARTNERSHIP, LTD.; TROY BECKER; BENTLEY FAMILY LIMITED PARTNERSHIP; ROBIN BERNHOFT; DEWAYNE BOCCALI; JANET BOULTON; MICHAEL BOULTON; DWAYNE BOWER; BURGESS RANCH; MICHAEL CALDWELL; CASITAS MUNICIPAL WATER DISTRICT; CASITAS MUTUAL WATER COMPANY; CHARLES CHO; JOE CLARK; KEVIN CLARK; LISA CLARK; REBECCA COLLINS; THOMAS COLLINS; MICHAEL CROMER; ROBERT C. DAVIS, JR.; LINDA EPSTEIN; ESSICK FARM MANAGEMENT COMPANY, LLC; ETCHART RANCH; JAMES FINCH; FLYING H RANCH, INC.; ERNEST FORD; WAYNE FRANCIS; FRIEND'S RANCHES, INC.; JOHN GALASKA; RICHARD GILLELAND; JURGEN GRAMCKOW and GERALDINE GRAMCKOW, individually as Trustees of the J&G Trust; GRIDLEY ROAD WATER GROUP; STEPHANIE GUSTAFSON; LAWRENCE HARTMANN; HERMITAGE MUTUAL WATER COMPANY; DOROTHY HOLMES; STEPHEN HUYLER; CHERYL JENSEN; BRETT KANTROWITZ; DENISE KANTROWITZ; JERRY KENTON; OLE KONIG; KROTONA INSTITUTE OF THEOSOPHY; TIM KROUT; BETINA LA PLANTE; LUTHERAN CHURCH OF THE HOLY CROSS OF OJAI; SCOTT LUTTENBERG; JEFFREY LUTTRULL; MEINERS OAKS WATER DISTRICT; FREDRICK MENNINGER; MARGARET MENNINGER; STEPHEN MITCHELL; BILL MOSES; NORTH FORK SPRINGS MUTUAL WATER COMPANY; OJAI WATER CONSERVATION DISTRICT; OLD CREEK ROAD MUTUAL WATER COMPANY; RANCHO DE CIELO MUTUAL WATER COMPANY; RANCHO MATILIJA MUTUAL WATER COMPANY; SHLOMO RAZ; SYLVIA RAZ; RINCON WATER AND ROAD WORKS; CHARLES RUDD; WILLIAM RUSIN; MARK SALEH; SENIOR CANYON MUTUAL WATER COMPANY; SIETE ROBLES MUTUAL WATER COMPANY; SISAR MUTUAL WATER COMPANY; SOULE PARK GOLF COURSE, LTD.; ST. JOSEPH'S ASSOCIATES OF OJAI, CALIFORNIA, INC.; ANDREW STASSE; GEORGE S. STUART; JOHN TAFT; TELOS, LLC; THACHER CREEK CITRUS, LLC, a California Corporation; THE THACHER SCHOOL; TICO MUTUAL WATER COMPANY; VICTOR TIMAR; TOPA TOPA RANCH COMPANY, LLC; LOU TOMESETTA; JOHN TOWN; TRUDIE TOWN; ERNESTO VEGA; VENTURA COUNTY WATERSHED PROTECTION DISTRICT; VENTURA RIVER WATER DISTRICT; WOOD-CLAEYSENS FOUNDATION; CALVIN ZARA; 1970 RANCH ROAD, LLC; 625 N. VENTURES AVENUE, LLC; ABRAHAM MUNOZ; AHDE and GANEA LAHTI, individually; ALAN and CAROL JAMES, individually; ALESSANDRO LOBBA and MARY E. JACKSON, individually as Trustees of the LOOBA-JACKSON FAMILY Trust; ALEXANDER and MARIA DORAN, individually; ALFREDO and MONTELLE BELLO, individually; ALVIN and CLAUDIA CUNNINGHAM, individually; AMERICAN RETIREMENT FUND, INC.; AMY MATTISON, Trustee of the Amy K. Mattison Trust; ANATOLY and MARGARITA KOZUSHIN, individually; ANDREA LEIGH JENSEN, Trustee of the Jensen Trust; ANDREW and JANE HOLGUIN, individually; ANDREW D. WEST and PATRICIA G. WEST, individually as Trustees of the West Family Revocable Trust; ANGIE MARI GANASEI and CHRISTOPHER PAUL DANCH, individually as Trustees of the Genasei-Danch Family Trust; ANNE LOMBARD and FRANK HANSON, individually; ARMANDO and SENDI SANCHEZ, individually; ARTHUR TIMOTHY and MAURYA KATHLEEN FOY, individually; ASHLEN and IVY AQUILA, individually; AUBREY BALKIND; AUBURN OAK BUILDERS, INC.; BARRY and ANGELA ROSS, individually; BEHROOZ JADIDOLLAHI; BENJAMIN and STACEY VAIL, individually; BERKLEY and SUZANNE BAKER, individually; BETTINA CHANDLER, Trustee of the Bettina Chandler Trust; BLANCHE CHAPLER; BRADFORD and CHERYL BOYD, individually; BRENT and SHANNA MUTH, individually; BRIAN and IRENE MCCONVILLE, individually; BRIAN and JOAN ARCHER, individually; BRIAN and SHARON SMITH, individually;



SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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☐ Plaintiff
 ☐ Defendant
 ☐ Cross-Complainant
 ☒ Cross-Defendant

BRIAN S. STAFFORD and JANICE M. THOMAS, individually as Trustees of the Stafford Thomas Family Trust Est., March 22, 2019; BRIAN SKAGGS, Trustee of the Skaggs Trust; BRIGITTE LOVELL, Trustee of the Lovell Living Trust; BRUCE ABBOTT and KATHLEEN QUINLAN, individually; BRUCE and DIXIE GLADSTONE, individually; BRYAN WHITLEY; BRYCE and KRISTA BELGUM, individually; CARL and BARBARA ENSON, individually; CARMEN CHAVEZ and GUADALUPE PATINO, individually; CAROL NICHOLSON; CAROL ANN TENNANT, Trustee of the Carol McDonnell Family Trust; CARRIE MURPHY and MICHAEL E. TEMPLIN, individually as Trustees of the Templin-Murphy 2016 Living Trust; CARTIN FAMILY, LLC; CATHERINE E. LEE, Trustee of the Catherine E. Lee Trust; CHAD WESCOTT and HEATHER CUSHNIE WESCOTT, individually; CHARLINE L. RICH and RICHARD GIBSON JR., individually; CHARLES E. STARBUCK, Trustee of the Charles E. Starbuck Trust; CHARLES P. WATLING, Trustee of the First Charles P. Watling Family Trust; CHRISTOPHER and TINA ABE, individually; CHRISTOPHER HART; CHRISTOPHER MOORE and MARY MOORE, individually as Trustees of the Christopher Moore and Mary Moore Trust; CINDY PROSE; CLAIR and STACEY HARDING, individually; CLAUDIA ZENOBIA LINARTE, Trustee of the Olga Trust; CLAUDIO and MAGDALENA LANDEROS, individually; COMMUNITY MEMORIAL HEALTH SYSTEM; CONNIE S. MORGAN, Trustee of the Connie S Morgan Trust; CONSERVATION ENDOWMENT FUND; CONSTANCE and JUSTIN CAMPBELL, individually; CORINNE ANNE FRAUND; CRAIG and ANA ZWIRN, individually; CURTIS and ORY NAMES, individually; CYNTHIA LEE, Trustee of the Cynthia Lee Family Trust; D & J CAMPBELL BEST, LLC; DAN NEWMAN; DAN STUART, Trustee of the Dana Stuart Trust; DAN WISEMAN; DANA and DAWN CENICEROS, individually; DANIEL and AMY YANEZ, individually; DANIEL and NANCY MCLAREN, individually; DANIEL and ROSALIND GRIMM, individually; DANNY BROADHURST; DARREN and LISA LISLE, individually; DAVID FRIEND and ANGELA MARIE FRIEND, individually; DAVID and LINDA SMITH, individually; DAVID and PATTI WICKLUND, individually; DAVID CHASE and ANNE FITZGERALD, individually; DAVID E. SISSUM, JR. and DIANA E. SISSUM, individually as Trustees of the Sissum Trust; DAVID FLICK and EMMA FLICK, individually; DAWN and MARK GOLDEN, individually; DB PROPERTIES, LLC; DEL CIELO, LLC; DENNIS and SUSAN RYDER, individually; DENNIS BROWN; DENNIS WOOD and MARGARET VIGIL WOOD, individually; DIANE RUTH WHITE, Trustee of the Diane Ruth White Living Trust; DIVE DEEP, LLC; DONALD and WENDY GIVENS, individually; DONALD CAMPBELL; DONNA and JAMES KLEEBURG, individually; DOROTHY HOLMES, Trustee of the Holmes Trust; DOROTHY LANQUIST; DOUGLAS FREEMAN and MIRANDA MARGETTS, individually; DZ SPE, LLC; EARL G. HOLDER, Trustee of the Holder Survivors Trust; EDWARD and GERALDINE LEE, individually; EDWARD C. LEICHT and JACQUELINE M. LEICHT, individually as Trustees of the Leicht Family 2013 Revocable Trust; ELEANOR SMALL; ELENA DHYANSKY, Trustee of the Elena Dhyansky Trust; ELIZABETH KEENEN; ELTON PEDERSEN and ALMA CLAYTON PEDERSEN, individually; ERIC and JODI PERDUE, individually; ERIC and MING JUN NAKAMURA, individually; ERIC and TRISHA JOHNSON, individually; ERIC LAWRENCE BERNTHAL, SPECIAL Trustee of the Boss and Venice Trust; ERIC LEWIS and BOBBI RODERICK LEWIS, individually; ERIK and TIRICA EADS, individually; EUGENE and CHARLOTTE ELERDING, individually; EVELYN FRAMENT; FORTUNE BUILDERS, INC.; FRANK ROBERT WALKER JR. and CARRIE ELLEN WALKER, individually as Co-Trustees of the Walker Jr. Living Trust; FREDERICK and LORI PONCE, individually; GALEN and MARIA DAVID, individually; GARY HIRSCHKRON, Trustee of the Gary Hirschcron Revocable Trust; GARY L. WOLFE, SUCCESSOR Trustee of the Carolyn M. Tastad Revocable Trust;

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GARY and TERRI MCCASKILL, individually as Trustees of the Mccaskill Family Trust; GARY SPEEDS and LISA R. KIRBY, individually as Trustees of the Gary Speeds and Lisa Kirby Family Trust; GELB ENTERPRISES; GEORGE and PAMELA ZELLER, individually; GEORGE and ROXANNE PELT, individually; GEORGE HERNANDEZ; GEORGE LAWHEAD, Trustee of the George and Carole Lawhead Revocable Trust; GIRL SCOUTS OF CALIFORNIA'S CENTRAL COAST; GLENN and LORI AHLBERG, individually; GORDON and PATRICIA BLACK, individually; GRALAR, LLC; GRAYDON and HELEN HARRAH, individually; GREGORY and MICHELE HAMMED, individually; GREGORY CAVETTE; GREGORY GRANT and MARY KING, individually; HANS and ANNIKA GRUENN, individually; HENDRIKA MARIA VON HECHT; HENRY and GENEVA OLIVA, individually; HENRY and LESLIE SOHM, individually; HOWARD and IRENE HOOS, individually; HUGH and LINDSAY THOMSON, individually; INTELL VENTURA, LLC; IRMA TRACY; JACKIE M. SPRINGER, Trustee of the Jackie M. and Lanie Jo Springer Trust; JAMES and ANDREA PENDLETON, individually; JAMES and GAYLE DAVID, individually; JAMES and STACI VALENCIA, individually; JAMES and SUE MILLS, individually; JAMES and TRISHA PROUD, individually; JAMES and ZELDA CARR, individually; JAMES PECK; JAMES I. PIO, Trustee of the James I. Pio Trust; JAN M. HIESTER, Trustee of the Jan M. Hiester 2014 Living Trust; JANE E. HANCHETT, Trustee of the Hanchett Family Trust; JANE SPILLER, Trustee of the Jane Spiller Trust; JANET LEWIS, Trustee of the Janet T. Lewis Family Trust; JANET PECK, Trustee of the Janet Lee Peck Living Trust; JEANNETTE CURTIS; JEFFREY E. FRANK, Trustee of the Frank Trust; JEFFREY TUBBS and LYNN DUBOWY DURAN, individually; JENNIE SCOTT, Trustee of the Jennie Scott Family Trust; JENNIFER WARE and JAMIE SELBY, individually; JEREMY AUGUST and ICOLE MARIE FERRO, individually; JESSE WADSWORTH and SUSAN HYND, individually; JESUS CORNEJO and IDANIA YUDITH CORNEJO, individually; JOAN KENTON, Trustee of the Joan Kenton Living Trust; JOANNA POPE; JODY CALLEGARI; JOEL HERNANDEZ; JOHANNA COLLINS; JOHN and LISA DILLARD, individually; JOHN and MARI ALLEN, individually; JOHN and NANCY BEVANS, individually; JOHN and NILA VENTRESS, individually; JOHN EDWARD and EVONNE LOUISE VACCA, individually; JOHN GUTIERREZ; JOHN MAZZOLA and APRIL GOLDEN, individually; JOHN TAFT CORPORATION; JON HANSON; JONATHAN and JACQUELINE PARKER, individually; JONATHAN and JULIE TEICHERT, individually; JOSE JUAREZ and ANA VALENCIA, individually; JOSE VALADEZ and NORMA HERNANDEZ, individually; JOSEPH PALMOUTSOS as Trustee of the Joseph Constantinos Palmoutsos Living Trust; JOSEPH POLITO, Trustee of the Joseph R. Polito 1989 Trust; JOSHUA ANTELMAN; JOYCE FRENETTE; JUAN ESPINOZA and TRAVIS COKER, individually; JUANA and HENRY MURILLO, individually; JUNE M. SPAR, Trustee of the June M. Spar Living Trust; JUSTIN and RACHAEL JAYNE, individually; KAREN MENDOZA, Trustee of the Vork Family Trust; KATHERINE PATTON and VIRGINIA MCCONNELL, individually; KATHLEEN TURNER and ELIZABETH RENN, individually; KAY BURNS; KEN COLLIN; KENNETH and MARIA BAKER, individually; KENNETH S. COLLINS, Trustee of the Frank R. Walker, Jr. Trust; KENT and PATRICIA HARDLEY, individually; KEVIN K. COX and MARY C. COX, individually as Trustees of the Cox Family Trust; KIM JIRKA, Trustee of the Kim Jirka Trust; KONSTANTIN DEMIDOV; KYLE BROWN; LANCE and DONELLE WOLESAGLE, individually; LARRY and CECILIA HICKOK, LARRY HUBENTHAL, individually and as Trustee of the Larry Hubenthal Living Trust; individually; LASZLO and SHARON BIHARI, individually; LASZLO ENGELMAN, Trustee of the Engelman Family Trust; LAUGHING DOG RANCH, LLC; LAVERNE M. BROWNING; LAWRENCE and RACHEL CLEVENSON, individually;



SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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**List additional parties** (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

LEON and CECELIA CARTER, individually; LEONARD FISCHER; LORENZO GAMA and YLDA CISNERO, individually; LORETTA MAY WILLIAMS, aka LORETTA MAY BLACKBURN, Trustee of the Loretta May Williams Revocable Living Trust; LUCILLE JANE CONFORTI and RANDALL NORMAN KIRK, individually as Co-Trustees of the "Lucille Jane Conforti Trust"; LYNN and ANN HENNE, individually; LYNN GOTCH and LINDA OLIVER, individually; MANUEL and SANDY GARCIA, individually; MARILYN WALLACE, Trustee of the MARILYN Wallace Separate Property Trust; MARIO AGUIRRE and PATRICE VERNAND, individually; MARK and MEGAN STEFFY, individually; MARK ANTHONY and KIM MARIE CRANE, individually; MARK ROBBINS, Trustee of the MARK ROBBINS Trust; MARK THOMPSON; MARTIN and DARIAN O'BRIEN, individually; MARTIN and LINDA GRAMCKOW, individually; MARTIN GRAMCKOW, Trustee of the Monika G. Huss Irrevocable Trust, Trustee of the Karin W. Gramckow Irrevocable Trust, Trustee of the Kurt J. Gramckow Irrevocable Trust; MARVEL PIERCE; MARYANN HEPP HILL, Trustee of the Hill Family Trust; MARY BERGEN, Trustee of the Rosemary Hall Bergen Trust; MARY MORRISON; MARY WALKART and WILLIAM HASTINGS, individually; MATILJA CANYON ALLIANCE; MATTHEW and CLAUDIA WILSON, individually; MATTHEW ARREOLA; MATTHEW BOWE; MATTHEW DWYER and COLLEEN WALKER, individually; MATTHEW LARREW and JORDANA KABAN, individually; MATTHEW SIMON and AMANDA VINO, individually; MICHAEL and CAROL DAVIS, individually; MICHAEL and CINDY BOEHM, individually; MICHAEL and HANNALORE GRESSER, individually; MICHAEL and KATHY OGDEN, individually; MICHAEL and KIM REGAN, individually; MICHAEL and MARIE MCTAVISH, individually; MICHAEL and PATRICIA MCWEENEY, individually; MICHAEL COGGINS JR. and CYNTHIA COGGINS, individually; MICHAEL GREYNALD, Trustee of the Greynald Family Trust; MICHAEL L. ROCKHOLD, Trustee of the Michael Rockhold Trust; MICHAEL TELLO; MICHELE WILLIS and JOHANNA COLLINS, individually; MIGUEL A. MAYORGA, Trustee of the Edward R. Mayorga Living Trust; MITCHAEAL and RUBEENA BREESE, individually; MITCHELL and ANA YOUNT, individually; MITCHELL and JOY DALBEY, individually; MITCHELL and LISA MYERS, individually; NANCY MOORE, Trustee of the Nancy Anne Moore Separate Property Trust; NIKOLAS and JULIA KRANKL, individually; OFFSHORE CRANE, INC.; OFFSHORE CRANE and SERVICE COMPANY, INC.; OFFSHORE FACILITIES; OJAI VALLEY CONSERVANCY; ORVILLE and MARION HERNVALL, individually; ORVILLE and PAMELA HIBDON, individually; OSWALDO and NORMA RUIZ, individually; PACIFIC TELEPHONE AND TELEGRAPH COMPANY; PAMELA WOOD; PATRIC and MARGARET PEAKE, individually; PATRICIA and EDWARD LANSBERG, individually; PATRICIA CUENOT; PATRICK and CATHY PAGNUSAT, individually; PAUL and ANGELA BOOTH, individually; PAUL and ASHLEY RAMSEY, individually; PAUL and MARIA LOZANO, individually; PAUL and MARTHA MEDLAR, individually; PAUL and OPAL SKAGGS, individually; PETER and KELLI FREIBERG, individually; PETER and ROBIN SHEDLOSKY, individually; PETER BROOKS and CARLA BROOKS, individually and as Trustees of the Escoda Brooks Family Trust; PETER CAMBIER, Trustee of the Peter and Marilyn Cambier Trust; PETER SCHEY, LLC; PEUVLIN VONG; PHILIP and DELIA SMITH, individually; PHILIP FERRANTE JR. and NICOLE AVERSA-FERRANTE, individually; PHILIPPE ROUSSEAU and KIMBERLY SHOBE, individually; PHYLLIS COURTNEY; RAFAEL HERNANDEZ; RAMONA L. ANDREW, Trustee of the Ramona L. Andrews Trust; RANCHO ARNAZ, LLC; RANCHO CASITAS, LLC; RANCHO SUENO, LLC; RAY and CAROLINA GUILLEN, individually; RAYMOND and ANNETTE WEST, individually; RICHARD and LAURA MANCILLA, individually; RICHARD and ALEXANDRA DUBEAU, individually; RICHARD and CYNTHIA ROBINETT, individually;

SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

RICHARD BOLTON; RICHARD MATHIEU and CLAUDIA HERRERA MATHIEU, individually; RICHARD MICHAEL and MARGARET KENNY, individually; RICHARD WILES and PEGGY CAREY, individually; ROBERT ALAN and STACEY JEAN BOYD, individually; ROBERT and CAROLYN JARBOE, individually; ROBERT and JUDITH CLARK, individually; ROBERT and NICKEY GREGORY, individually; ROBERT and PATRICIA MCFALL, individually; ROBERT and SUSAN BENNITT, individually; ROBERT and ANNA J. AURIC, individually as Trustees of the Auric Revocable Trust of 1999; ROBERT LEVIN and LISA SOLINAS, individually; ROBERT MARK and LORRAINE MELISA LOVATO, individually; ROBERT OCONNOR; ROBERT PETRIN and BEATE SCHICKERLING, individually; ROBERT L. STONE, Trustee of the Robert L. Stone Revocable Living Trust; ROBERT S. YOUNG, Trustee of the Young Trust; RONALD and JANIS CALKINS, individually; RONALD KAPLAN and CYNTHIA DANIELS, individually; RUDOLPH and CAROL SALDAMANDO, individually; RUSSELL JAMES HALL, Trustee of the Russell James Hall Family Trust; SAM and DEBBIE TUCKER, individually; SCOTT ALAN and EVA PRINCE WEISS, individually; SCOTT and AKI FRESHMAN, individually; SCOTT and BERNADETTE KING, individually; SCOTT and SARAH MCKAY, individually; SCOTT GREGORY EROCKSON and HANNAH BETH GUZIK, individually; SCOTT R. JOHNSON and MARGARET BATES, individually; SERAFIN CALDERON and BLANCA ORTIZ, individually; SHANE and AMY WATKINS, individually; SHANE NASH; SHARON and BRUCE SPENCER, individually; SHARON BROWN, Trustee of the Sharon Brown Living Trust; SHAUN and DAISY GARMAN, individually; SHIRLEY M. PALMER, Trustee of the Shirley Palmer Revocable Trust; SKYNEST, LLC; SOCIETE D'INVESTISSEMENT IMMOBILIERES ET FINANCIERS FRANCO-ALLEMAND, a French corporation; STEPHEN STEPHEN ROSLANSKY and LINDA ROSLANSKY, individually as Trustees of the Roslansky Family Trust; STEPHEN and CARIN KALLY, individually; STEPHEN and CINDY BARRACK, individually; STEPHEN CARR and DEBRA GILL, individually; STEPHEN M. JOHNSON, Trustee of the Stephen M. Johnson Living Trust; STEPHEN SANFORD; STEPHEN ZANE FRASER; STUART and NANCY RUPP, individually; SUDARSHAN GAUTAM; SUSAN GARY; SUSAN M. RALPH, Trustee of the Ralph Trust; SUSAN YARNELL; SUSHMA GUJRAL; SUZANNE RHODES, Trustee of the Bateman-Rhodes Family Trust; T. SNYDER; TAMARRA BARBEY; TANE CHARLES ARNOLD, individually, and as Trustee of the Tane C. Arnold 2006 Living Trust; TEEN CHALLENGE OF SOUTHERN CALIFORNIA, INC; TERRA CROWLEY; TERRANCE O'CONNOR and KATHY FRANKLIN, individually; TERRIE LONGO; THE BAPTISTE FOUNDATION; THE OJAI VALLEY LAND CONSERVANCY; THEODORE and JUDY LUCAS, individually; THEODORE and NORMA SCHNEIDER, individually; THEODORE and TRACY MANDRYK, individually; THEODORE and PEARL MALOS, individually and as Trustees of the Malos Family Trust; THOMAS and CHRISTINE REED, individually; THOMAS and NIKKI YOUNG, individually; TIMOTHY and NICOLE BECKETT, individually; TOBIAS and TANIA PARKER, individually; TODD HENARD and KIBHI MARIE HENARD, individually; TROPICO, LLC; VICTOR and SHERYL SANCHEZ, individually; VICTORIA and JOHN JUNKIN, individually; VIDA VIDA, Trustee of the VIDA FAMILY Trust; VIJAY and NEETA PATEL, individually; VIRGINIA I. WILLIAMSON, individually and as Trustee of Trust of Virginia I. Williamson; VIRGINIA TREVINO; WALID A. ALAWAR, Trustee of the Walid A. Alawar Living Trust; WARREN HEATH; WILLIAM and CHERYL MEADE, individually; WILLIAM and HELEN PECK, individually; WILLIAM and IRENE SNIVELY, individually; WILLIAM and KIMBRA CARNAGHE, individually; WILLIAM and PAULA STEVENS, individually; WILLIAM LOUGHBORO; WILLIAM STARR; YONG YI; YVETTE MARIE and DANIEL JOSEPH SINOHUI, individually; ZACHARY and DIANE TOTTEN, individually

SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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 ☒ Cross-Defendant

1300 SHIPPEE LANE, LLC; 3584 CALLE MORENO, LLC; AARON and ANGELA HOEKSTRA, individually; ABEL and LOURDES CARRANZA, individually; ACSLAYTON, LLC; ADAM CASEY and BRITTANY CHISUM, individually; ADAM DISTL, JR. and BARBARA B. DISTL, individually as Trustees of the Adam Distl, Jr. And Barbara B. Distl 1998 Revocable Trust; ADRIAN OGDEN; AERA ENERGY, LLC; AJR INVESTMENT PARTNERSHIP, LP; ALAN and DEBORAH SHARON, individually; ALAN and LESLIE CONNELL, individually; ALAN and MARY KIRBY, individually; ALAN and SUSAN ECKER, individually; ALAN WALBRIDGE and DOROTHY FAY WALBRIDGE, individually; ALBERTO and ADRIANA MONTANO, individually; ALBERTO and HILDA ZAMORA, individually; ALBINE HOPCUS and ALVA LYDIA HOPCUS, individually as Trustees of the Al and Alva Trust; ALFONSO and ALEJANDRA LIMON, individually; ALLAN and JANIS PARKHURST, individually; ALLAN and KATHARINE PARIGIAN, individually; ALLAN and MARY DOANE, individually; ALLEN VAIL; ALVARO and ELVA RUIZ, individually; ALVIN and CLAUDIA CUNNINGHAM, individually; ANA CROSS, Trustee of the ANA CROSS FAMILY Trust; ANDRE KEUNZLI and FABRIENNE KEUNZLI-MONARD, individually; ANDREW and MELISSA MACCALLA, individually; ANDREW and REBECCA CHANDLER, individually; ANDREW and SHARON ENGEL, individually; ANGELA JAYNE GARDNER and JOHN PERCIVAL MAWSON, individually as Trustees of the Pleasant Avenue Living Trust; ANITA J. DIAZ; ANN H. DONLON, Trustee of the Ann H. Donlon Revocable Trust; ANNA ARCHER; ANNA KIRKWOOD; ANNE and DANIEL GOLDSTEIN, individually; ANSON B. THACHER and ANNE F. THACHER, individually as Trustees of the A. and A. Thacher Living Trust; ANTHONY BECCHIO and DENISE HEIMO, individually; ANTHONY MASIEL; ANTONIO ESPINO and MARIA TORRES, individually; ARNE ANSELM and MICHELLE VELDERRAIN, individually; ARNE ANSELM, Trustee of the Velderrain M. Trust; ASHLEY and VICTORIA EDWARDS, individually; BALDEMAR ALCANTAR and MICAELA ORTIZ ALCANTAR, individually; BARBARA A. FITZGERALD, Trustee of the Fitzgerald 1994 Trust; BARBARA BONSIGNORI; BARBARA CHEN LOWENTHA, Trustee of the 2017 Barbara Kay Chen Lowenthal Revocable Trust; BARBARA HALL, Trustee of the Barbara Hall Living Trust; BARNARD PROPERTIES, LLC; BART KENNEDY; BARTON KENNEDY; BERNARD MARTIN; BETH E. LINDLEY; BETTYANN SESSING; BIG BLACK DOG, LLC; BLAZE BUONPANE; BRADLEY and ANDREA ROE, individually; BRADLEY and IVELOU PANTOSKEY, individually; BRANDON and TRESSA KAHLER, individually; BRANDON and KELSIE SCHNEIDER, individually and as Trustees of the Brandon Schneider and Kelsie Simms-Schneider Family Trust; BREAL and KAREN ROWE, individually; BRENDAN RICHARD and CHRISTA LEE DAWN FREEMAN, individually; BRENT and PAMELA LAMO, individually; BRETT and LYNN WILSON, individually; BRETT CUNNINGHAM; BRETT NICHOLSON and NAN DAVIS, individually; BRIAN and CYNTHIA MCDANIEL, individually; BRIAN and ERIN EDWARDS, individually; BRIAN and JEAN HARRISON, individually; BRIAN and MARIE HAASE, individually; BRIAN and SIOBHAN CALVIN, individually; BRIAN A. SCHAFFELS; BRIAN OSBORNE and KIRSTEN HINRICHS, individually; BRITTANY and ALAN FLETCHER, individually; BRUCE and LESLIE BOUCHE, individually; BRUCE and VIRGINIA HIBBERD, individually; BRUCE C. BROCKMAN and BRIDGET TSAO-BROCKMAN, individually as Trustees of the Tsao Brockman Family Trust; BRYAN and NICOLE CRAWFORD, individually; BULMARO and ALFONSA PENA, individually; BYRON and JENNIFER GREENE, individually; BYRON RADER and MYRA TOTH, individually; CAL B. LAND CO., LLC; CALATLANTIC GROUP INC.; CAMP RAMAH IN CALIFORNIA INC.; CARL and JUDITH BELL, individually; CARL and LEIGH HYNDMAN, individually; CARL GADDIS and ANNA HICKS, individually;

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CARLA DENNIS, Trustee of the Carla D. Dennis Trust; CARLA MELSON and CARLA J. MELSON, individually as Trustees of the Carla J. Melson Revocable Living Trust; CARMEN and CAROLINA MURILLO, individually; CAROL MARQUEZ-OLSON, Trustee of the Carol Marquez-Olson Trust; CAROL VESECKY, Trustee of the Carol B. Vesecky Revocable Living Trust; CAROLINE TURNER, Trustee of the Turner Survivors Trust; CAROLYN BOWMAN, Trustee of the Carolyn Bowman 2008 Trust; CAROLYN HUISSH; CARYN MOLINELLI; CATHERINE LANCASTER; CATHERINE SELLMAN; CATHERINE SMITH, Trustee of the Catherine L. Smith Revocable Trust; CESAR and DAVIENNE GUERRA, individually; CESAR JIMENEZ and AURA MINERA, individually; CHAARENNE TORRIS and RAYMOND BRADLEY, individually; SOUTHERN CALIFORNIA ASSOCIATION OF SEVENTH DAY ADVENTISTS; CHAD CARPER; CHAD RESS and STEPHANIE WASHBURN, individually; CHAD VICK, Trustee of the Chad C. Vick Trust; CHARLENE VAN DEUSEN; CHARLES and DEANA SHERRY, individually; CHARLES and JO BENNETT, individually; CHARLES G. BARNETT, SUCCESSOR Trustee of the "Barnett Family Exemption Equivalent Trust"; CHARLES L. HOFF and KATHLEEN D. HOFF, Co-Trustees of the Hoff Revocable Trust; CHARLES MONN and ELENA HALE, individually; CHARLES R. RUDD and LOLA L. RUDD, Trustees Under the Charles R. Rudd and Lola L. Rudd Trust; CHRISTIE MATTULL, Trustee of the Christie Lynn Mattull Trust; CHRISTINE and DONALD BOWEN, individually; CHRISTINE GOLDEN; CHRISTOPHER and ANNA RHODA, individually; CHRISTOPHER and GILLIAN BORGESON, individually; CHRISTOPHER and SHELAGH DUKE, individually; CHRISTOPHER CORSONES, Trustee of the Christopher Corsones Living Trust; CHRISTOPHER MCGUIRE; CHRISTOPHER SEWELL; CHRISTOPHER WEINER and DAMIAN BOURGUET, individually; CINDY BURKHART, Trustee of the Cindy Burkhart Living Trust; CITY OF OJAI; CLAUDIA FARR, Trustee of the Sam S. Farr And Claudia S. Farr Trust; CLAUDIA WUNDERLICH, Trustee of the Claudia A Wunderlich Trust; CLEMENTINE TURNER, Trustee of the Clementine Turner Living Trust; CODY GREEN; CODY STEVENS; CONNIE ANAISE; CONNIE and MARK CLINE, individually as Trustee of the Mark Terry Cline Family Trust; CONSTANCE EATON; CORY and NICHOLAS WINGATE, individually; COUNTY OF VENTURA; CRAIG and STEPHANIE GARDNER, individually; CRAIG YOUNG and DANIEL POLING, individually; CULBERT FAMILY PARTNERSHIP; CURTIS and CHRISTINA TOLMIE, individually; CYNTHIA ELLIS and PAMELA THOMAS, individually; DAJ PROPERTIES, LLC; DAMIAN and LORIE VOS, individually; DAMON and ANNE BRINK, individually; DANIEL and ADAYA WALSH, individually; DANIEL and DEBORAH HOYT, individually; DANIEL and ELIZABETH GEORGE, individually; DANIEL and ELIZABETH MCLAUGHLIN, individually; DANIEL and JANE KELLY, individually; DANIEL and LYDIA RUARK, individually; DANIEL and RALPH FAIRBANKS, individually; DANIEL and TOMICA MORA, individually; DANIEL and YOKO MCSWEENEY, individually; DANIEL CHRYNKO; DANIEL CRANE; DANIEL H. I. and WILLIAM D. MOSES JR., individually as Trustees of the William D. Moses, Jr. Separate Trust No. 1; DANIEL HULTGEN, Trustee of the Hultgen Living Trust; DANNY HAAR and MARISKA DE FEITER, individually; DARRELL RALSTON, Trustee of the Darrell Anthony Ralston 2009 Revocable Trust; ; DAVE and KATHLEEN TARRATS, individually; DAVID and BEVERLY FULTON, individually; DAVID and CAROL CINTRON, individually; DAVID and DEBORAH TODD, individually; DAVID and DONNA BERGER, individually; DAVID and ELIZABETH SILVA, individually; DAVID and FERESCHTA SINCLAIR, individually; DAVID and KAREN BRUBAKER, individually; DAVID and KATHLEEN OSTBY, individually; DAVID and LAURA MEISCH, individually; DAVID and LAURIE MAHAN, individually; DAVID and MEGHAN SANDOVAL, individually; DAVID and MINDY BENEZRA, individually; DAVID and PEGGY STANWOOD, individually; DAVID and SANDRA MURILLO, individually; DAVID and SHANNON RICHARD, individually;

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☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

DAVID and SHARRON SPARKS, individually; DAVID and STEPHANIE BERGER, individually; DAVID and TONI JOHNSON, individually; DAVID COREY and JEAN SCHOLLES, individually; DAVID E. PRESSEY and AGNES E. PRESSEY, individually as Trustees of the David E. And Agnes E. Pressey Family Trust; DAVID KILLE and SHANNON FREW, individually; DAVID L. GARBER and CYNTHIA GARBER, individually as Trustees of the Garber Trust; DAVID ORBACH and EVA ARAUJO, individually; DAVID STANLEY and MONICA BEDNAR STANLEY, individually; DAWN and BARCLAY HOPE, individually; DE and JACQUE PISCIOтта, individually; DEAN and GLORIA VADNAIS, individually; DEAN and LORINDA STRONG, individually; DEANNA GONZALES, individually; DEIRDRE LYNDS, individually; DELAVAN C. GARST and SHARON D. GARST, individually as Trustees of the Delavan and Sharon Garst Family Trust; DELL and ANNE MERCER, individually; DELORES and JERRY BERLIN, individually; DENISE WIZMAN, as Trustee of the Denise Wizman Revocable Trust; DENNIS and CHERYL JACOBS, individually; DENNIS and NADINE CORTE, individually; DEREK MEEK; DEVON and JILLIANN COLLINGE, individually; DIANA ENGLE, Trustee of the Diana L Engle Revocable Trust; DIANA PERON, Trustee of the Diana C Peron Living Trust; DIANA SYVERTSON, Trustee of the Diana Syvertson Living Trust; DIANA TRENT, Trustee of the Diana Trent Living Trust; DIANE and WILLIAM CLEGG, individually; DIANNE MCCOURTNEY, Trustee of the Dianne Louise McCartney Trust; DOLORES KEITH; DOMINIC HABIBI; DONALD and CLARA TENPENNY, individually; DONALD BROSNAC and TWILA CARLSEN, individually; DONALD DAVIS; DONALD G. and SUSAN B. DAVIS, individually as Trustees of the Donald G. And Susan B. Davis Revocable Family Trust of 1997; DONIS MONTOYA JR. and TERESITA MONTOYA, individually; DONNA DEITCH, Trustee of the DONNA E. DEITCH Trust; DONNA EPSTEIN, Trustee of the Epstein Survivors' Trust, Trustee of the Epstein Marital Trust, and Trustee of the Epstein Bypass Trust; DOROTHY and JAMES KEHOE, individually; DORTHEA KECK; DOUGLAS and ANN PARENT, individually; DOUGLAS and CLAUDIA WEBBER, individually; DOUGLAS and ELISABETH VERNAND, individually; DOUGLAS and KATHLEEN LEIGHTON, individually; DOUGLAS and MOIRA VOLPI, individually; DOUGLAS DRAPER; DOUGLAS WASSON, Trustee of the Wasson Trust; DUSTIN BEILKE; ED and LINDA COLBY, individually; EDSON TAFT, Trustee of the Edson B. Taft Revocable Trust; EDWARD and DEBORAH GUERRA, individually; EDWARD and LAURA SAVALA, individually; EDWARD and NANCY DENNIS, individually; EDWARD and NANCY NECKER, individually; EDWARD and ROBERTA WALSH, individually; EDWARD DUNN and JUDITH SHELBY DUNN, individually; EDWARD PRESSEY; EDWIN NORRIS PROCTER, Trustee of the "E. Norris Procter Living Trust"; EILAM BYLE, Trustee of the Eilam Byle Living Trust; EILEEN STERLING, Trustee of the Eileen M. Sterling Revocable Trust; EILEEN WALKER; EL SERENO 1225, LLC; ELAIENE KEELEY, Trustee of the Elaiene Keeley Trust; ELAINE FERGUSON; ELI and JESSICA NEIDERHISER; ELIA ALDAPA; ELIZABETH BAUER, Trustee of the Elizabeth A Bauer Trust; ELLEN LEOPOLD; ELMER and JOAN SWIFT; EMILY BENSON and LISA MARTEL, individually; EMILY CLAY and MATTHEW GOODMAN, individually; ERBAY and VELDA GARCIA, individually; ERIC and ARLENE SCHWERDTFEGGER, individually; ERIC and JOLENE HARRINGTON, individually; ERIC BUSH and CRAIG YOUNG, individually; ERIC DILKS, Trustee of the Eric M. Dilks 2004 Revocable Trust; ERIC GOODE; ERIC MOORE; ERIC ROSENBERG; ERNEST and DOROTHY NICHOLS, individually; ERNEST THORNSBERRY, Trustee of the Ernest Thornsberry Revocable Trust; ESPERANZA and SANDRA GUERRERO, individually; EUGENIJUS VALIULIS, Trustee of the Eugenijus Valiulis Revocable Living Trust; EUSEBIO and LORI NAVARRO, individually; EVELYN BARAN, Trustee of the Evelyn F Baran Personal Residence Trust; EZEQUIEL and AMBER MONARREZ, individually; FELIX and DELMY GARCIA, individually; FERNANDO PORRAS; FERROZ and MONA ZAIDI, individually;

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☐ Plaintiff ☐ Defendant ☐ Cross-Complainant ☒ Cross-Defendant

FINCH FARMS, LLC; MEREWETHER JUDSON, LLC; FLOYD and CHARLENE FITZGERALD, individually; FLOYD EUGENE WIANCKO and HIROKO WIANCKO, Trustees of the Wiancko Family Trust; FOREST HOME, INC.; FORTUNE REAL ESTATE 888, LLC; FRANCIS and SHAUNA LONGSTAFF, individually; FRANCISCO and ANGELICA VALLES, individually; FRANK and LILA SHEL TREN, individually; FRANK C. URIAS and EVANGELINE S. URIAS, individually as Trustees of the Urias Family Trust; FRANK CHAROLLA; FRANK EDWARD SHEL TREN, JR., aka FRANK E. SHEL TREN and RITA CHERYL SHEL TREM, individually as Trustees of the Sheltren Family Trust; FRED and CARINE FISHER, individually; FRED and DONNA STEVENS, individually; FRED KRAMER and MICHAELA WATKINS, individually; FREDERIC DEVAULT; FREDERICK and LAURA FULMER, individually; FREDERICK SLOMAN and NORDI HINTZE, individually; FREDRICK and ROXANNE BAKER, individually; FUTURE MHPS, LLC; GABRIEL and MARGARITA MENDOZA, individually; GALE and BERNABE GAONA JR., individually; GARY and CHARI PETROWSKI, individually; GARY and COLLEEN FRY, individually; GARY and JOLENE CLARKE, individually; GARY and JUDITH STEVER, individually; GARY and PATRICIA TUCKER, individually; GARY and TERESA DOWNARD, individually; GENE and PATTY SAITO, individually; GENNEVA MASCHLER and RICHARD YACIUK, individually; GEOFFREY and PAULA CLARKE, individually; GEOFFREY BROWN and STEPHANIE GIBSON, individually; GEORGE and LINDA BOSTON, individually; GEORGE and LYNN MALONE, individually; GEORGE and MARGARET MELTON, individually; GEORGE and SIGRID BRESSLER, individually; GEORGE STUART; GERALD and DARLENE CARLSON, individually; GERARD LINSMEIER; GERBEN and JILL HOEK SMA, individually; GINO LYNCH; GLENN MYERS, Trustee of the Glenn C. Myers Family Trust; GORDON and TERRY HANUSEK, individually; GORDON GIBBONS, Trustee of the Gordon R. Gibbons Living Trust; GRANT KEMP; GREG and JULIE TEBO, individually; GREGG and ROSIE DIERICKX, individually; GREGG OLSON, Trustee of the Gregg W. Olson Revocable Trust; GREGORY and KAORI GOLDEN, individually; GREGORY and MARTHA LEPI NE, individually; GREGORY and SARAH DELVECCHIO, individually; GREGORY and SUSAN GILBERT, individually; GREGORY and SUSAN IGNACIO, individually; GREGORY and SUZANNE COMBS; GREGORY HERAS and ROZANNE BONA VITO, individually; GREGORY JOHNSON; GREGORY N. PIMSTONE and LAURYN B. HARRIS, individually as Trustees of the Pimstone Family Trust; GRIFFIN and NICOLE WILLIAMSON, individually; GUDAZ, LLC; GUY and SHERI FLASCH, individually; GUY BRATTON; H and BEVERLY LEARD, individually; HACIENDA LADERA, LLC; HANK and ALANA GARCIA, individually; HANS and EILEEN VAN KOPPEN, individually; HARALD WAGNER; HARLAN KOSSOW; HARRISON HILL and LAUREN WILSON, individually; HARRY and MARILYN LEHR, individually; HARRY JOE; HAYDEN and RAQUEL WHITE, individually; HECTOR and ROCIO TORRES, individually; HEIDI C. KURTZ, Trustee of the Gunild Walsh Seadrift Qprt FBO Heidi C. Kurtz; HELIBERTA VALENCIA; HELP OF OJAI, INC.; HENRY and MOIRA TARMY, individually; HERMANN and GAY THOMSEN, individually; H. H. LEARD and BEVERLY LEARD, individually as Trustees of the Leard Family Trust; HICKEY BROS LAND CO. INC.; HOLLY BASSUK; HOWARD and RUTH MILLER, individually; HOWARD ALTMAN, Trustee of the Gerta Maritz Trust; HOYT TAROLA; IAN and CAROL ATKINSON, individually; IGNACIO and ROSE VEGA, individually; IMELDA MARES, Trustee of the Imelda Mares Trust; INDUSTRIAL VENTURA; INTEGRITAS OJAI, LLC; IRMA CRUZ; IRSHAD and LINDA HAQUE, individually; ISIDRO SANCHEZ; J INVESTMENTS; J MCGLINCHEY; JACK and MARIE KENTON, individually; JACK and SIMONE PATTERSON, individually; JACK and VERA TURBYVILLE, individually; JACOB and ANJA ZIMMERMAN, individually; JACQUELINE DORFMAN, Trustee of the Jacqueline Dorfman Revocable Living Trust; JACQUELINE URBAND; JAKOB and MARIANNE VOS, individually; JAMES and ALISA VARNEY, individually;

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List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

JAMES and DANIELA CASEY, individually; JAMES and DORI SANDEFER, individually; JAMES and JANET LECROY, individually; JAMES and LAURA FERNANDEZ, individually; JAMES and MARYETTA SANDERS, individually; JAMES and PENNY HARVEY, individually; JAMES and RANDI CATLETT, individually; JAMES and WENDY OSHER, individually; JAMES DATA; JAMES FINLEY, Trustee of the James And M. Reen Finley Family Trust; JAMES FINCH, Trustee of the Finch Family Trust; JAMES J. FINCH and LORRAINE HOLVE FINCH, individually as Trustees of the James J. Finch and Loraine Holve Finch Living Trust; JAMES PAUL FINCH; JAMES KIRK and JACELYN HAYES, individually; JAMES SELMAN, Trustee of the JAMES C. SELMAN REVOCABLE INTER VIVOS Trust; JAMES W. COULTAS and MARGARET COULTAS, Trustees of the James A. And Margaret H. Coultas Intervivos Trust; TERRY COULTAS WILSON; JAMES W. COULTAS Trustee of the Coultas Living Trust; JAN and PRISCILLA GRANADE, individually; JANE MCCORD, Trustee of the Jane Ann Mccord Living Trust; JANET MCGINNIS, Trustee of the Janet Karen Mcginnis Trust; JANICE and JESSE HILLESTAD, individually; JANICE HALL, Trustee of the HALL Trust; JANIS LONG NICHOLAS and JESS E. LONG, individually as Co-Trustees of the Long Family Trust; JASON and JENE LOOMIS, individually; JASON and KATHRYN HEADLEY, individually; JASON and LANA SPEAR, individually; JASON LOOMIS; JASPER and JESSICA JONES, individually; JAYNE PENDERGAST, Trustee of the 2014 Jayne E Pendergast Trust; JEFF and CHEREE SIMONS, individually; JEFF and DESIREE WILBY, individually; JEFF MABRY; JEFFERIE SKAGGS and TIMOTHY BUNCE, individually; JEFFREY and DENISE HELM, individually; JEFFREY and DONNA MEYER, individually; JEFFREY and HOLLY LIEBER, individually; JEFFREY JENSON; JEFFREY KENTON, Trustee of the Jeffrey T. Kenton 2004 Revocable Living Trust; JEFFREY S. BACON, Trustee of the Villa Nero Trust; JEFFREY WEINSTEIN; JEFFRY and FIONA POUGHIER, individually; JENNIFER KISTLER, Trustee of the Jennifer L Kistler Trust; JEREMY and BRITTANIA RENNIE, individually; JERI LEONARD; JEROME H. HITTLEMAN and LYNNE M. GOLDFARB, Trustees of the Jerome H. Hittleman And Lynne M. Goldfarb Revocable 2016 Trust; JERRY DEAN MINER and GERALDINE ANN MINER, Trustees of the Miner Trust; JESS EARL LONG; JESSIE STRICCHIOLA and ROSEMARY GARRISON, individually as Trustees of the Phoenix Revocable Trust; JESUS and MARIA RAMOS, individually; JILL OLIVARES, Trustee of the Jill Ann Olivares Revocable Living Trust; JIMMY and THERESA RAMIREZ, individually; JLB RANCHO VISTA, LLC; JOAN GEDDES and JOHN SALUPPO, individually; JOAN ROBLES; JOANN BENSON, Trustee of the Joann Alva Benson Revocable Living Trust; JOANNE BARNES, Trustee of the Barnes Family Trust; JOEL FOX and JENNIFER DAY, individually; JOEL VUYLSTEKE, Trustee of the Country Club Trust; JOHANNA RAE LONG; JOHN and A. ELROD, individually; JOHN and ALITEA MARUSZEWSKI, individually; JOHN and CRYSTAL PEAKES, individually; JOHN and JANIS NICHOLAS, individually; JOHN and LUCILLE ELROD, individually; JOHN and MONICA HARTMANN, individually; JOHN and NORMA CURTIS, individually; JOHN and PARRIS COLLINS, individually; JOHN and PATRICIA ESSICK, individually; JOHN and TONYA PERALTA, individually; JOHN and VICTORIA BORTOLUSSI, individually; JOHN BATTEL, Trustee of the John J Battel Living Trust; JOHN BROOMFIELD, Trustee of the John Nicholas Broomfield Trust; JOHN F. JOHNSTON and KATHERINE M. JOHNSTON, individually as Trustees of the John Fraser Johnston Family Trust; JOHN HAIGH, JR.; JOHN KERTIS; JOHN MUTLOW; JOHN PACE, Trustee of the John Brice Pace Family Trust; JOHN RICHARDSON; JOHN VINEYARD; JOHN WARNER and JENNIFER DUNN, individually; JOHN WILLINGHAM; JOHN WINSPEAR; JOHN YOUNG; JONATHAN WONG and JAN KOMURA, individually; JOSE and IMELDA HURTADO, individually; JOSE and LISA MENDEZ, individually; JOSE ARREOLA JR. and PAOLA CARRENO, individually; JOSE OLVERA and ALMA VALENCIANO, individually; JOSEPH and DRENDA PLEDGER, individually;



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☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

JOSEPH LYNN and ELVIRA LILLY BARTHELEMY, individually and Trustees of the Joseph Lynn Barthelemy and Elvira Lilly Barthelemy 2002 Family Trust; JOSEPH and KATHLEEN LASALLE, individually; JOSEPH and MICHELLE HARWELL, individually; JOSEPH and NINA NEULIGHT, individually; JOSEPH and SHIRLEY GHOLSON, individually; JOSEPH LAM; JOSEPH RANDALL, Trustee of the Joseph Darden Randall Revocable Trust; JOSEPH RESEIGH; JOSEPH TOOKER; JOSHUA and JENNIFER GOLDSTEIN, individually; JOSHUA MOREAU; JOYCE and FRANK PATOTA, individually; JUAN and GLORIA ESTRADA, individually; JUAN and MARIA MARTINEZ, individually; JUDITH REICHMAN and HAROLD BROWN, individually; JULIANNE BLOOMER and PHILIP RABE, individually; JULIE CENTENO; JULIO LUNA and DEBBIE LUN, individually; JUNE SEARS, Trustee of the June Katherine Sears Living Trust; JUPETO PROPERTIES, LLC; KAC LLC; KAREN L. HANSON and LAWRENCE S. HANSON, Trustees of the Hanson L.S. Revocable Living Trust; KAREN PHIPPS, Trustee of the Phipps Family Trust; KARIN DRON, Trustee of the Boyd S. Dron and Karin K. Dron Joint Living Trust; KARIN L. JAMES, Trustee of the James Family Trust; KARL and BEVERLEY MALLETTE, individually; KATHARINE and JOHN BROESAMLE, individually; KATHLEEN and ADAM MORRISON, individually; KATHLEEN and THOMAS GERMAN, individually; KATHLEEN BACHELOR; KATHLEEN NOLAN, Trustee of the Kathleen Ann Nolan Revocable 2006 Family Trust; KATHRYN BARTHOLOMEW, Trustee of the Kathryn Oconnor Bartholomew Living Trust; KATHY ALDERMAN; KATZ PINCETL ORCHARD, LLC; KAY DORNBUSCH, Trustee of the Dornbusch Family Living Trust; KEITH and ANAHID JEWETT, individually; KEITH and ROBIN LAWSON, individually; KEITH and VICTORIA NIGHTINGALE, individually; KELLEY and JOHN DYER IV, individually; KELVIN DODD and DEBORAH GOMEZ, individually; KENETT NIESSEN; KENNETH and ANNE BOYDSTON, individually; KENNETH and BRENDA WHITTEKER, individually; KENNETH and CAROL FERGESON, individually; KENNETH and ELIZABETH GRUBER, individually; KENNETH and LAURA BROWN, individually; KENNETH and MICHAEL BALLARD, individually; KENNETH and SARAH VAN DYKE, individually; KENNETH MORGAN; KENNETH VADNAIS; KERN COUNTY; KEVIN and ASLI RUF, individually; KEVIN and JENNIFER WHITE, individually; KEVIN and JOANNE OLSLAND, individually; KEVIN and JODI DUNN, individually; KHALED A. AL-AWAR and SHERYL L. AL-AWAR, individually as Trustees of the K. and S. Al-Awar Family Trust; KIKI LYON, Trustee of the Kiki Lyon Living Trust; KIM HANNA, Trustee of the Hanna Family Trust; KRISTAN ALTIMUS; KURT and DAYNA ROGGENSTROH, individually; KURT and LUISA NEHER, individually; KURT PATRICK ZIERHUT and STEPHANIE LEE ZIERHUT, Co-Trustees of the Living Trust of Kurt Patrick Zierhut and Stephanie Lee Zierhut; LANSRING, LP; LARRY and JOYCE HEATH, individually; LARRY DAVIS; LARRY HUBENTHAL, Trustee of the Larry Hubenthal Living Trust; LARRY NEFF, Trustee of the Larry Neff Trust; LAS ENCINAS MOBILE HOME PARK; LAURA B. PECK and ANDREW D. VILES, individually as Trustees of the William L. and LAURA B. PECK Trust - Marital Trust; LAURA GREEN, Trustee of the Green Survivors Trust; LAURIE JOHNSON, Trustee of the Laurie A. Johnson Living Trust; LAURIE SMITH; LAWRENCE and SHARON MCMILLAN, individually; LAWRENCE I and PATRICIA A. HARTMANN, individually as Trustees of the Larry and Pat Hartmann Family Trust; LEE and JANET CASSEL, individually; LEE FITZGERALD, Trustee of the Lee I Fitzgerald 2007 Revocable Living Trust; LEE LEBECK; LEE ROSENBAUM, Trustee of the Chief Cornerstone Trust; LEON and CAROLINE PAHLE, individually; LEONARD PETITT and KAY ROLFE, individually; LESLEE and TERRY GUSTAFSON, individually; LESLIE MCCLEARY; LESTER L. and LINDA L. BARBEE, individually as Trustees of the Lester L. Barbee and Linda L. Barbee Joint Revocable Living Trust; LIANA HARP and NATHAN JONES, individually; LILIAN RUVALCABA; LINDA CHAPMAN, Trustee Linda of the Jean Chapman Living Trust;



SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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LINDA GRIFFIN; LINDA MCLAUGHLIN, Trustee of the Linda Landrieu McLaughlin Living Trust; LINDA OLIVER, Trustee of the Linda A Oliver 2005 Revocable Living Trust; LIPKA RICHARD, Trustee of the Lorraine Trust; LISA LOPEZ and BRIAN MERRILL, individually; LISA SMITH and NATHANIEL COX, individually; LLOYD SMITH; LOGAN and MISTY HAGEGE, individually; LOGAN and TIFFANY GOULD, individually; LOIS STONE ERBURU, as Trustee of the Surviving Spouse's Trust Created in the Robert and Lois Erburu Living Trust; LON and MARGARETA KIRKGAARD, individually; LONGHORN LANE, LLC; LORENE CLEARY; LORI SCHLOREDT; LOU and BARTON MATTHEWS, individually; LOUIS GUTIERREZ, JR. and IRENE GUTIERREZ, individually; LOUIS PRICE; LOUISE and GARY CULVER, individually; LOUISE KONSTANZER, Trustee of the Ron and Louise Konstanzer Family Trust; LOUISE TINDLE, SOLE Trustee of the "Bypass Trust" Created Under The Tindle Trust; LUIS HERRERA and KIMBERLY OYAMA, individually; LUPE MILNER, Trustee of the Lupe Milner Family Trust; LYDIA JIMENEZ; LYLE and CECILIA HALLBLOM, individually; LYNDON HEBENSTREIT; LYNN COLEMAN; LYNN PIKE, Trustee of the Lynn 2016 Trust; LYSIANE WALLIS; M. SNYDER; MALCOLM and BRENDA KNIGHT, individually; MALCOLM and KELLEY MCDOWELL, individually; MANDY MACALUSO, Trustee of the Living Trust of Mandy Macaluso; MANUEL ALMEIDA and KEVIN BAGLEY, individually; MARCUS and AMY HUEPPE, individually; MARCUS and EVA KETTLES, individually; MARGARET M. ALDRICH, Trustee of the Russell F. Aldrich and Margaret M. Aldrich "Decedent's Trust," and Trustee of the Russell F. Aldrich and Margaret M. Aldrich Living Trust; MARGO KELLY, Trustee of the Kelly Trust; MARIA BLASCO; MARIA COLLINS; MARIE W. WALLACE, Trustee of the Marie Weismiller Wallace Separate Property Trust; MARIKA ZOLL; MARILYN SWEENEY, Trustee of the Marilyn Sweeney Revocable Living Trust; MARIO and SHAWN REYES, individually; MARION and BETTY EARNEST, individually; MARK and COLLEEN RUSIN, individually; MARK and CONNIE CLINE, individually; MARK and HELEN MOSKOVITZ, individually; MARK and MARCIA ALBERTSEN, individually; MARK BELLINI; MARK W. ETCHART, Trustee of the Mark W. Etchart Separate Property Trust, and Trustee of the Michel A. Etchart Separate Property Trust; MARSHA MACDONALD; MARSHALL and DINA MURPHY, individually; MARTHA FAST, Trustee of the Martha L Fast Living Trust; MARTHA LALIBERTE; MARTHA MORAN; MARTIN and BARBARA POPS, individually; MARTIN and NATALIE EHRLICH, individually; MARTIN and PATRICIA HENDERSON, individually; MARY and THOMAS SNOW, individually; MARY DOWNER, Trustee of the Arthur and Mary Downer Family Trust; MARY L. VOMUND, Trustee of the Mary L. Vomund 1987 Trust; MARY THOMAS, Trustee of the Thomas Survivors Trust; MARY WINGATE, Trustee of the Mary Louise Wingate Trust; MATTAWA and ROND LARUE CLEMENTS, individually; MATTHEW and JUDY FARMER, individually; MATTHEW and KIMBERLY HULTGEN, individually; MAX REED; MAXIMIANO and NORMA ORTIZ, individually; J. MCGLINCHEY; MCNELL CREEK RANCH, A GENERAL PARTNERSHIP; MCNELL PROPERTIES, LLC; MELESIO RAMIREZ; MELISSA VAN SICLEN; MERL and KIM MELSTRAND, individually; MICHAEL and ALLISON SEDLAK, individually; MICHAEL and ANNELL LA BARGE, individually; MICHAEL and BARBARA MCCARTHY, individually; MICHAEL and BERNARD CLARK, individually; MICHAEL and CAROL JACKSON, individually; MICHAEL and DIANNA FARRAR, individually; MICHAEL and HEIDI BRADBURY, individually; MICHAEL and KIMBERLY ROBERTSON, individually; MICHAEL and NANCY KRUMPSCHMIDT, individually; MICHAEL and SHARON WILLIAMS, individually; MICHAEL and SONJA BARRETT, individually; MICHAEL and TERRI IMWALLE, individually; MICHAEL CHAMBLISS; MICHAEL HOOVER, Trustee of the Michael Hoover Living Trust; MICHAEL KELLEY; MICHAEL L. DELAMORE and DEBORAH FINLEY-DELAMORE, individually as Trustees of the Delamore Finley Family Trust; MICHAEL LOMBARDO, Trustee of the Michael Lombardo Living Trust;

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MICHAEL MARIETTA, individually and as Trustee of the Marietta Separate Property Trust; MICHAEL PRENTICE; MICHAEL PURDY, Trustee of the Purdy Family Revocable Trust; MICHAEL SALEH, Trustee of the Saleh and Lea Saleh 1984 Family Trust; MICHAEL T. MARSHALL and LISA SKYHEART MARSHALL, individually as Trustees of the Marshall Living Trust; MICKY FROELICH; MIGUEL and ELVIA RAMIREZ, individually; MIGUEL ESTRADA; MURELLE STEVENS, Trustee of the Stevens Family Trust; NANCY FERRELL, Trustee of the Nancy A. Ferrell Family Trust; NANCY GRAHAM; NANCY JACKSON, Trustee of the Nancy J. Jackson Living Trust; NATALIA MOORE, Trustee of the Moore Family Trust; NATHAN ALLEN; NATHANIEL and SUZETTE O'GRADY, individually; NATHANIEL TRAUDT and KAREN TRAUDT, individually and as Trustees of the Traudt Family Trust; NEIL and PATRICIA FRIEDRICHSEN, individually; NEIL KREITMAN, Trustee of the Neil Kreitman Living Trust; NICK and MORNA TAMINICH, individually; NICKDAILY; NINA MENCONI; NYE RANCH, LLC; OAK HAVEN, LLC; OAK VIEW SANITARY DISTRICT; KRISHNAMURTI FOUNDATION OF AMERICA; OILFIELD SERVICE and TRUCK CO.; OILFIELD SERVICE and TRUCK, INC.; OJAI ASSEMBLY OF GOD, INC., DBA OJAI'S CHURCH OF THE LIVING CHRIST, INC.; OJAI HOME, LLC; OJAI UNIFIED SCHOOL DISTRICT; OJAI VALLEY ATHLETIC CLUB; OJAI VALLEY LAND CONSERVANCY; OJAI-JACKMAN, LLC; OLE BEHRENDTSEN; OLGA and TRENT JONES, individually; ORIN JR. and KAREN CHAPPELL, individually; ORVILLE HERNVALL, Trustee of Hervnall Orville and Marion Orville Trust; OSCAR and MARY KAAS, individually; OSCAR ACOSTA, Trustee of the Acosta Trust; OST TRUCKS and CRANES; OVIS, LLC; PAMELA GRAU, Trustee of the Pamela Grau Living Trust; PAMELA MELONE, Trustee of the Pamela M. Melone Living Trust; PATRICIA BOAN and ALINA HOFFMAN, individually; PATRICIA BOAN and JOHN HOFFMAN, individually; PATRICIA MARSHALL, Trustee of the Patricia Ann Marshall Trust; PATRICIA MCPHERSON; PATRICIA MCGANN; PATRICIA UNRUHE and ANDREW JARVIS, individually; PATRICK HENDERSON and JESSICA MAHARRY, Trustees of the Maharry Henderson Family Trust; PATRICK TUMAMAIT; PAUL and ALDINE HENNIGAN, individually; PAUL and JANET BAILEY, individually; PAUL and JUNE CLEM, individually; PAUL and KIM ROBIE, individually; PAUL and MAELYN EBERT, individually; PAUL and SALLY CENTENO, individually; PAUL FONTEYN, individually; PAUL HOLAHAN and JULIE GRIST, individually; PAUL LEPIANE and BO BENGTSON, individually; PAULA BROWN, Trustee of the Paula Jean Brown Trust; PAULA LASITER; PAULA MCCULLOUGH, Trustee of the Paula J. McCullough Living Trust; PAULINE MERCADO, Trustee of the Pauline Mercado Revocable Trust; PEDRO CISNEROS; PEDRO TEPESANO; PER and INGE CHRISTIANSEN, individually; PERRY FAMILY, LLC; PETER and LINDA DAPRIX, individually; PETER and NORMA DWORKIS, individually; PETER DUFAU; PETER PASSELL; PETER STRAUSS and RACHEL TICOTIN, individually; PETROCHEM DEVELOPMENT I, LLC; PHILIP and DARYLYN LONG, individually; PHILIP and MARY PIERPONT, individually; PHILIP and ROBERT PIERPONT, individually; PHILIPPE and BETSY CALAND, Trustees of the Philippe M. and Betsy C. Trust; PREPARATORY VILLANOVA; QUINT MORRIS; RACHEL KONDOR and BRIAN SEGEE, individually; RAFAEL and MAGDALENA VILLALPANDO, individually; RAFFI J. MESROBIAN and MYRNA R. MESROBIAN, individually as Trustees of the Mesrobian Family Trust; RAINER BUSCHMANN and JOHN JOHNSTON, individually; RALPH and LYNNE LUNDY, individually; RAMAA MOSLEY; RANDAL R. O'CONNOR, SUCCESSOR Trustee of the Red Clay Trust, and successor Trustee of the Le Cedre Trust; RANJIT SEVAPRAKASAM; RAY HALL, Trustee-in-Trust of the 30 Acre Trust; RAYMOND and ESTHER KARDLY, individually; RAYMOND and EVA LYONS, individually; RAYMOND MAGEE and LINDA TAYLOR, individually; RDK LAND, LLC; REBECCA ADAMS; RED MOUNTAIN LAND and FARMING, LLC; REEVES ORCHARD, LLC;

SHORT TITLE: Santa Barbara Channelkeeper v. State Water Resources Control Board	CASE NUMBER: 19STCP01176
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List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

REFUGIO GOMEZ; REX and HEIDI LANNING, individually; REYNOLDS FLEMING; RICARDO GONZALEZ; RICHARD and BILLIE SUMNER, individually; RICHARD and EMILY CARGILL, individually; RICHARD and KATHERINE GODFREY, individually; RICHARD and LEE HARPER, individually; RICHARD and MARILYN KALLAS; individually RICHARD and NANCY FRANCIS, individually; RICHARD and TERESA TURNER, individually; RICHARD DODSON, Trustee of the Richard E. Dodson 2010 Revocable Trust; RICHARD FRANCIS; RICHARD FREY and WENDY APPLEBY, individually; RICHARD and EMMA KLINE, individually; RICHARD LOWEN; RICHARD MAGANA; RICHARD MCGRATH, Trustee of the Richard K McGrath Living Trust; RICHARD SOJKA; RJPR LTD. PARTNERSHIP; ROBERT and ANAMARIA SCHMID, individually; ROBERT and ANTOINETTE TIVY, individually; ROBERT and DIANA PETROPULOS, individually; ROBERT and DIANNE STONE, individually; ROBERT and DOMINQUE DANIELS, individually; ROBERT and DORA BALITZER, individually; ROBERT and EMILY MARTIN, individually; ROBERT and GAEA CANNADAY, individually; ROBERT and GERALDINE HUNSAKER, individually; ROBERT and JACQUELINE MCDANIEL, individually; ROBERT and JANICE HASTIE, individually; ROBERT and MARILYN SALAS, individually; ROBERT and MAUREEN YOUNG, individually; ROBERT and SHEILA GHEN, individually; ROBERT and SONIA RODARTE, individually; ROBERT and TAUNDRA RODDICK, individually; ROBERT and ANNA J. AURIC, individually as Trustees of the Auric Anna J. Family Trust; ROBERT CALDER DAVIS, JR., Trustee of the Robert Davis Surviving Spouse's Trust, Trustee of the Davis Family Bypass Trust and Trustee of the Davis Family Trust; ROBERT DEKKERS; ROBERT ERICKSON and RONALD WILSON, individually; ROBERT GRASMERE; ROBERT POLIDORI and BRITTANY SANDERS, individually; ROBERTO and MARIA ALONSO, individually; ROCKY MANN; RODERICK and JOYCE GREENE, individually; ROGER and SUSAN DICKENS, individually; ROGER BURKE; ROGER HALEY; Trustee of the Roger and Christina Haley Survivors Trust; ROGER WALKER; ROGERS-COOPER MEMORIAL FOUNDATION; RONALD and BETTE BLUHM, individually; RONALD and JULIA BRUNS, individually; RONALD BLOOD and LINDA JORDAN, individually; RONALD E. NOVAK and LINDA L. LEWIS, individually as Trustees of the Novak Family Trust; RONALD K. FREELAND and DOREEN FREELAND, individually as Trustees or their successors in interest of the Freeland Trust and any amendment; RONALD L.R. HILL and DEBI R. HILL, Trustees of the R&D Hill Family Trust; RONALD VOGT; ROSEMARIE SINGER; ROSEMARY PAYNE, Trustee of the Rosemary Payne Trust; ROSS ANDERSON; ROWLAND A. HILL II and BRENDA M. HILL, individually as Trustees of the Trust dated November 1, 2002; ROY HICKS, Trustee of the Roy and Jacquelyn Hicks Family Trust; RUBEN and MARISA MARTINEZ, individually; RUBEN CHAVEZ; RUBEN MAGANA and JANETTE LUPERCIO, individually; RUDY BAEZ; RUSSEL and LAURA ALFORD, individually; RUSSELL and GOLDEN WILEY, individually; RUSSELL WALDROP, Trustee of the Russell B. Waldrop Living Trust; RYAN and LAUREN NICHOLS, individually; SABINO and NICKI PEREZ, individually; SABRINA VENSUS, Trustee of the Sabrina Vensus Living Trust; SALLY CRAIN; SALVATORE SCARPATO; SAMUEL and JOANNA SCHINDEL, individually; SAMUEL EATON; SANTA ANA RANCH, INC.; SARAH YOUNG; SAUNIE KREWSON; SCOTT and BRITTANY DENTON, individually; SCOTT and CAROL RASMUSSEN, individually; SCOTT and KEELA ALLISON, individually; SCOTT and MARIA HERTZOG, individually; SCOTT and MICHELE SUPAN; SCOTT CHASSE, Trustee of the Scott Chasse Revocable Living Trust; SCOTT FORSYTH and JOY FEDELE, individually; SCOTT LUNDY, Trustee of the Scott Lundy Trust; SCOTT LUTTENBERGER and NATASHA WILCOX, individually; SCOTTIE MONICAL; SEAN and LESLIE BENNETT, individually; SERAFIN and MARTHA FLORES, individually; SEVAN GERARD; SHAHRAM SHAHROKHFAR and DINA NAVA, individually;

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☐ Plaintiff ☐ Defendant ☐ Cross-Complainant ☒ Cross-Defendant

SHANKS INVESTMENT GROUP, LLC; SHAWN FULBRIGHT, Trustee of the Shawn Fulbright 2014 Revocable Trust; SHAWN REED; SHELL OIL CO.; SHERRICE and JOHN WEECES, individually; SHERRIE DAILY; SHERYL SHUSHAN; SHIPPEE, LLC; SHULL BONSALL, JR., Trustee of the SHULL BONSALL FAMILY Trust; EVANGELINE BONSALL SMITH, a married woman; SIDNEY and JAYNE RICE, individually; STEVEN P. SMITH and LYNN DAVIS-SMITH, individually as Trustees of the Smith Revocable Living Trust; SOUTHERN CALIFORNIA EDISON CO.; SOUTHERN CALIFORNIA ASSOCIATED INVESTORS, LTD.; SPENCER and BAILEY HILL, individually; SRPS, LP; STACY CADENASSO; STANLEY and THERESA WYATT, individually; STANLEY and W HUBBELL, individually; STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION; STEFAN KOZAK and ANA LOPES, individually; STEPHANIE and CHERYL BEAS, individually; STEPHEN MATZKIN, Trustee of the Stephen Matzkin Trust; STEPHEN TURNER, Trustee of the Stephen R. Turner Living Trust; STEVEN and BRENT KANALY, individually; STEVEN and CHRISTINE VAUGHAN, individually; STEVEN and KA RAPHOLZ, individually; STEVEN and KAREN ERICKSON, individually; STEVEN and KRISSELL DUTTER, individually; STEVEN ELLIOT EDELSON, Trustee of the Los Angeles Entertainment Trust; SUMEET BHATIA and MICHAEL MCDONALD, individually; SUMPURAN KHALSA, Trustee of the Sumpuran S. Khalsa Living Trust; SURIA and JOHN GOTTESMAN, individually; SUSAN BEE, Trustee of the John and Susan Bee Family Trust; SUSAN CONLEY, Trustee of the William and Susan Conley Family Trust; SUSAN DILLER, Trustee of the Susan J Diller Trust; SUSAN GARAND; SUSAN GRUBER, individually and as Trustee of the Susan Gruber Living Trust; SUSAN MCCORD-NEUFELD; SUSAN MOLL; SUSAN WEBSTER; SUZANNE HARVEY, individually and as Trustee of the Suzanne G. Harvey Revocable Trust; T BONE HOLDINGS, LLC; TANYA SMITH and MICHAEL MONTANO, individually; TANYA STARCEVICH; TED ROBINSON, Trustee of the Robinson Family Trust; TELOS DEVELOPMENT OJAI, LLC; TERRY WILSON, Trustee of the Terry Coultas Wilson Living Trust; THE OJAI RENTAL, LLC; THE ROMAN CATHOLIC ARCHBISHOP OF LOS ANGELES, a sole corporation; THEODOR and LORE EXNER, individually; THERESA STARK; THOMAS and CYNTHIA CARVER, individually; THOMAS and NANETTE BENBROOK, individually; THOMAS and JADONA COLLIER HARPER, individually; THOMAS JACKSON; THOMAS TAMPLIN and MICHELLE WELLS, individually; THOMAS WALBRIDGE, Trustee of the Thomas C Walbridge Trust; THREE OAKS, LLC; THREE SISTERS ORCHARD, LP; TIMOTHY and CHERYL AUSTIN, individually; TIMOTHY and KATHLEEN MCHUGH, individually; TIMOTHY and KATHRYN MORAN, individually; TIMOTHY and LINDA TURNER, individually; TIMOTHY and MARY WILLIAMSON, individually; TIMOTHY JONES; TODD and CHRISTINA MCGINLEY, individually; TODD RYAN and JESSICA CLICK, individually; TODD TULLETT, Trustee of the Todd Tullett Revocable Living Trust; TOM and NANCY ROLAND, individually; TONY and HEATHER CARLOS, individually; TRACEY and MELANIE BOULTON, individually; TRENT and KRIS GRECO, individually; TYLER and MARIA BARRELL, individually; TYLER LABINE and CARRIE RUSCHEINSKY, individually; ULDINE and FABIEN CASTEL, individually; URIEL and CHIEKO LOPEZ, individually; US NATURAL RESOURCES, INC.; VALLEY OAK CHARTER; VANLAW INVESTMENT CORP.; VENTURA LAND Trust; VENTURA UNIFIED SCHOOL DISTRICT; VICENTE GUZMAN; VICKI DAW; VICKI L. HOLLINGSWORTH, Trustee of the Hollingsworth Trust; VIRGINIA M. MCCARTHY, Trustee of the Virginia M. McCarthy Living Trust; VIRGINIA SIEGFRIED, Trustee of the Virginia A. Siegfried Revocable Trust; VIVIAN ARBER; VIVIENNE MOODY; WALTER and EVELYN GOLIS, individually; WALTER and LINDA BOYSIEWICK, individually; WALTER MCGOWAN, individually and as Trustee of the Walter Robert McGowan 1995 Trust; WANDA and MENIFORD CANTERBERRY, individually;

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☐ Plaintiff    ☐ Defendant    ☐ Cross-Complainant    ☒ Cross-Defendant

WATERMARK CARP II LLC; WAYNE TATE and JANICE PRIEBE-TATE, individually as Trustees of the Tate Trust, as community property; WEISS INVESTMENT PROPERTIES; WENDY and DAVID CHURCHILL, individually; WERNER and ELVA FISCHER, individually; WESLEY SCOTT and KASEY PERINS, individually; WEST CRAG GLEN SMITH, successor Trustee of the Melissa Irene Elizabeth Smith Irrevocable Special Needs Trust - 1993; WILLI and STEFANIE U. COELER, individually and as Trustees of the W. and S. Coeler Living Trust; WILLIAM and CYNTHIA ANDERSON, individually; WILLIAM and JACQUELINE BOCH, individually; WILLIAM and LORRAINE WALSH, individually; WILLIAM and MELINDA WELCH, individually; WILLIAM and SUSAN LUTHER, individually; WILLIAM B. HART, JR., Trustee of the Constance Eaton Personal Residence Trust; WILLIAM BAILEY, Trustee of the William F. Bailey Living Trust; WILLIAM BROTHERS, Trustee of the William C. Brothers Living Trust; WILLIAM ERICKSON; WILLIAM F. NEWTON and CHARLOTTE R. NEWTON, individually as Trustees of the NEWTON FAMILY Trust; WILLIAM GILBRETH, Trustee of the William J. Gilbreth Trust; WILLIAM HAWKSWORTH; WILLIAM LOWES; WILLIAM L. REYNOLDS; WILLIAM WHITE, Trustee of the William C. White Trust; WILLIAM WHORF; WILMETTA DAVIS; WINFRIED and CAROL BOERSCH, individually; WYNN JOHNSON and LISA AYALA JOHNSON, individually; YAN and ALILI COMMENT, individually; YARROW and CAROLINE CHENEY, individually; YITZHAK and SMADAR ORLANS, individually; YVON and MALINDA CHOUINARD, individually; ZOBIDA OLSON

ALL PERSONS WHO OWN AN INTEREST IN LAND ADJACENT TO THE VENTURA RIVER OR ITS TRIBUTARIES OR IN LAND OVERLYING THE VENTURA RIVER WATERSHED'S GROUNDWATER BASINS AND CLAIM AN INTEREST TO DIVERT, PUMP, EXTRACT OR STORE GROUNDWATER FROM, UNDER OR ON THAT LAND

and ROES 1-1,000

1 GENE TANAKA, Bar No. 101423  
gene.tanaka@bbklaw.com  
2 SARAH CHRISTOPHER FOLEY, Bar No. 277223  
sarah.foley@bbklaw.com  
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6

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8 BEST BEST & KRIEGER LLP  
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9 Tel.: 619.525.1300; Fax: 619.233.6118

10 Attorneys for Respondent and Cross-Complainant  
11 CITY OF SAN BUENAVENTURA

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

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

18 v.

19 STATE WATER RESOURCES  
CONTROL BOARD, a California State  
20 Agency;  
CITY OF SAN BUENAVENTURA, a  
21 California municipal corporation,  
incorrectly named as CITY OF  
BUENAVENTURA,

22 Respondents.

23 CITY OF SAN BUENAVENTURA, a  
24 California municipal corporation,

25 Cross-Complainant

26 v.

27 DUNCAN ABBOTT;  
AGR BREEDING, INC.;  
28 [continued on next page]

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

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

JAN 02 2020

Sherril R. Carter, Executive Officer/Clerk  
By: Tanya Herrera, Deputy

Case No. 19STCP01176

Judge: Honorable William F. Highberger

Deemed Verified Pursuant to Cal. Civ. Proc.  
Code § 446

RESPONDENT AND CROSS-  
COMPLAINANT CITY OF SAN  
BUENAVENTURA'S THIRD AMENDED  
CROSS-COMPLAINT FOR:

1. VIOLATION OF REASONABLE USE;
2. VIOLATION OF PUBLIC TRUST;
3. DECLARATORY RELIEF - PUEBLO  
AND/OR TREATY WATER RIGHTS;
4. DECLARATORY RELIEF -  
PRESCRIPTIVE WATER RIGHTS;
5. DECLARATORY RELIEF -  
APPROPRIATIVE WATER RIGHTS;
6. COMPREHENSIVE ADJUDICATION;
7. DECLARATORY RELIEF - MUNICIPAL  
PRIORITY;
8. DECLARATORY RELIEF - HUMAN  
RIGHT TO WATER; and
9. DECLARATORY RELIEF



1 ASQUITH FAMILY LIMITED PARTNERSHIP, LTD.; TROY BECKER; BENTLEY FAMILY  
2 LIMITED PARTNERSHIP; ROBIN BERNHOFT; DEWAYNE BOCCALI; JANET  
3 BOULTON; MICHAEL BOULTON; DWAYNE BOWER; BURGESS RANCH; MICHAEL  
4 CALDWELL; CASITAS MUNICIPAL WATER DISTRICT; CASITAS MUTUAL WATER  
5 COMPANY; CHARLES CHO; JOE CLARK; KEVIN CLARK; LISA CLARK; REBECCA  
6 COLLINS; THOMAS COLLINS; MICHAEL CROMER; ROBERT C. DAVIS, JR.; LINDA  
7 EPSTEIN; ESSICK FARM MANAGEMENT COMPANY, LLC; ETCHART RANCH; JAMES  
8 FINCH; FLYING H RANCH, INC.; ERNEST FORD; WAYNE FRANCIS; FRIEND'S  
9 RANCHES, INC.; JOHN GALASKA; RICHARD GILLELAND; JURGEN GRAMCKOW and  
10 GERALDINE GRAMCKOW, individually as Trustees of the J&G Trust; GRIDLEY ROAD  
11 WATER GROUP; STEPHANIE GUSTAFSON; LAWRENCE HARTMANN; HERMITAGE  
12 MUTUAL WATER COMPANY; DOROTHY HOLMES; STEPHEN HUYLER; CHERYL  
13 JENSEN; BRETT KANTROWITZ; DENISE KANTROWITZ; JERRY KENTON; OLE  
14 KONIG; KROTONA INSTITUTE OF THEOSOPHY; TIM KROUT; BETINA LA PLANTE;  
15 LUTHERAN CHURCH OF THE HOLY CROSS OF OJAI; SCOTT LUTTENBERG; JEFFREY  
16 LUTTRULL; MEINERS OAKS WATER DISTRICT; FREDRICK MENNINGER;  
17 MARGARET MENNINGER; STEPHEN MITCHELL; BILL MOSES; NORTH FORK  
18 SPRINGS MUTUAL WATER COMPANY; OJAI WATER CONSERVATION DISTRICT;  
19 OLD CREEK ROAD MUTUAL WATER COMPANY; RANCHO DE CIELO MUTUAL  
20 WATER COMPANY; RANCHO MATILIJA MUTUAL WATER COMPANY; SHLOMO RAZ;  
21 SYLVIA RAZ; RINCON WATER AND ROAD WORKS; CHARLES RUDD; WILLIAM  
22 RUSIN; MARK SALEH; SENIOR CANYON MUTUAL WATER COMPANY; SIETE  
23 ROBLES MUTUAL WATER COMPANY; SISAR MUTUAL WATER COMPANY; SOULE  
24 PARK GOLF COURSE, LTD.; ST. JOSEPH'S ASSOCIATES OF OJAI, CALIFORNIA, INC.;  
25 ANDREW STASSE; GEORGE S. STUART; JOHN TAFT; TELOS, LLC; THACHER CREEK  
26 CITRUS, LLC, a California Corporation; THE THACHER SCHOOL; TICO MUTUAL WATER  
27 COMPANY; VICTOR TIMAR; TOPA TOPA RANCH COMPANY, LLC; LOU TOMESETTA;  
28 JOHN TOWN; TRUDIE TOWN; ERNESTO VEGA; VENTURA COUNTY WATERSHED

1 PROTECTION DISTRICT; VENTURA RIVER WATER DISTRICT; WOOD-CLAEYSSSENS  
2 FOUNDATION; CALVIN ZARA [collectively, "Original Cross-Defendants"];

3

4 1970 RANCH ROAD, LLC; 625 N. VENTURES AVENUE, LLC; ABRAHAM MUNOZ;  
5 AHDE and GANEA LAHTI, individually; ALAN and CAROL JAMES, individually;  
6 ALESSANDRO LOBBA and MARY E. JACKSON, individually as Trustees of the LOOBA-  
7 JACKSON FAMILY Trust; ALEXANDER and MARIA DORAN, individually; ALFREDO and  
8 MONTELLE BELLO, individually; ALVIN and CLAUDIA CUNNINGHAM, individually;  
9 AMERICAN RETIREMENT FUND, INC.; AMY MATTISON, Trustee of the Amy K. Mattison  
10 Trust; ANATOLY and MARGARITA KOZUSHIN, individually; ANDREA LEIGH JENSEN,  
11 Trustee of the Jensen Trust; ANDREW and JANE HOLGUIN, individually; ANDREW D.  
12 WEST and PATRICIA G. WEST, individually as Trustees of the West Family Revocable Trust;  
13 ANGIE MARI GANASEI and CHRISTOPHER PAUL DANCH, individually as Trustees of the  
14 Genasei-Danch Family Trust; ANNE LOMBARD and FRANK HANSON, individually;  
15 ARMANDO and SENDI SANCHEZ, individually; ARTHUR TIMOTHY and MAURYA  
16 KATHLEEN FOY, individually; ASHLEN and IVY AQUILA, individually; AUBREY  
17 BALKIND; AUBURN OAK BUILDERS, INC.; BARRY and ANGELA ROSS, individually;  
18 BEHROOZ JADIDOLLAHI; BENJAMIN and STACEY VAIL, individually; BERKLEY and  
19 SUZANNE BAKER, individually; BETTINA CHANDLER, Trustee of the Bettina Chandler  
20 Trust; BLANCHE CHAPLER; BRADFORD and CHERYL BOYD, individually; BRENT and  
21 SHANNA MUTH, individually; BRIAN and IRENE MCCONVILLE, individually; BRIAN and  
22 JOAN ARCHER, individually; BRIAN and SHARON SMITH, individually; BRIAN S.  
23 STAFFORD and JANICE M. THOMAS, individually as Trustees of the Stafford Thomas Family  
24 Trust Est., March 22, 2019; BRIAN SKAGGS, Trustee of the Skaggs Trust; BRIGITTE  
25 LOVELL, Trustee of the Lovell Living Trust; BRUCE ABBOTT and KATHLEEN QUINLAN,  
26 individually; BRUCE and DIXIE GLADSTONE, individually; BRYAN WHITLEY; BRYCE  
27 and KRISTA BELGUM, individually; CARL and BARBARA ENSON, individually; CARMEN  
28 CHAVEZ and GUADALUPE PATINO, individually; CAROL NICHOLSON; CAROL ANN



1 TENNANT, Trustee of the Carol McDonnell Family Trust; CARRIE MURPHY and MICHAEL  
2 E. TEMPLIN, individually as Trustees of the Templin-Murphy 2016 Living Trust; CARTIN  
3 FAMILY, LLC; CATHERINE E. LEE, Trustee of the Catherine E. Lee Trust; CHAD  
4 WESCOTT and HEATHER CUSHNIE WESCOTT, individually; CHARLINE L. RICH and  
5 RICHARD GIBSON JR., individually; CHARLES E. STARBUCK, Trustee of the Charles E.  
6 Starbuck Trust; CHARLES P. WATLING, Trustee of the First Charles P. Watling Family Trust;  
7 CHRISTOPHER and TINA ABE, individually; CHRISTOPHER HART; CHRISTOPHER  
8 MOORE and MARY MOORE, individually as Trustees of the Christopher Moore and Mary  
9 Moore Trust; CINDY PROSE; CLAIR and STACEY HARDING, individually; CLAUDIA  
10 ZENOBIA LINARTE, Trustee of the Olga Trust; CLAUDIO and MAGDALENA LANDEROS,  
11 individually; COMMUNITY MEMORIAL HEALTH SYSTEM; CONNIE S. MORGAN,  
12 Trustee of the Connie S Morgan Trust; CONSERVATION ENDOWMENT FUND;  
13 CONSTANCE and JUSTIN CAMPBELL, individually; CORINNE ANNE FRAUND; CRAIG  
14 and ANA ZWIRN, individually; CURTIS and ORY NAMES, individually; CYNTHIA LEE,  
15 Trustee of the Cynthia Lee Family Trust; D & J CAMPBELL BEST, LLC; DAN NEWMAN;  
16 DAN STUART, Trustee of the Dana Stuart Trust; DAN WISEMAN; DANA and DAWN  
17 CENICEROS, individually; DANIEL and AMY YANEZ, individually; DANIEL and NANCY  
18 MCLAREN, individually; DANIEL and ROSALIND GRIMM, individually; DANNY  
19 BROADHURST; DARREN and LISA LISLE, individually; DAVID FRIEND and ANGELA  
20 MARIE FRIEND, individually; DAVID and LINDA SMITH, individually; DAVID and PATTI  
21 WICKLUND, individually; DAVID CHASE and ANNE FITZGERALD, individually; DAVID  
22 E. SISSUM, JR. and DIANA E. SISSUM, individually as Trustees of the Sissum Trust; DAVID  
23 FLICK and EMMA FLICK, individually; DAWN and MARK GOLDEN, individually; DB  
24 PROPERTIES, LLC; DEL CIELO, LLC; DENNIS and SUSAN RYDER, individually; DENNIS  
25 BROWN; DENNIS WOOD and MARGARET VIGIL WOOD, individually; DIANE RUTH  
26 WHITE, Trustee of the Diane Ruth White Living Trust; DIVE DEEP, LLC; DONALD and  
27 WENDY GIVENS, individually; DONALD CAMPBELL; DONNA and JAMES KLEEBURG,  
28 individually; DOROTHY HOLMES, Trustee of the Holmes Trust; DOROTHY LANQUIST;

1 DOUGLAS FREEMAN and MIRANDA MARGETTS, individually; DZ SPE, LLC; EARL G.  
2 HOLDER, Trustee of the Holder Survivors Trust; EDWARD and GERALDINE LEE,  
3 individually; EDWARD C. LEICHT and JACQUELINE M. LEICHT, individually as Trustees of  
4 the Leicht Family 2013 Revocable Trust; ELEANOR SMALL; ELENA DHYANSKY, Trustee of  
5 the Elena Dhyansky Trust; ELIZABETH KEENEN; ELTON PEDERSEN and ALMA  
6 CLAYTON PEDERSEN, individually; ERIC and JODI PERDUE, individually; ERIC and MING  
7 JUN NAKAMURA, individually; ERIC and TRISHA JOHNSON, individually; ERIC  
8 LAWRENCE BERNTHAL, SPECIAL Trustee of the Boss and Venice Trust; ERIC LEWIS and  
9 BOBBI RODERICK LEWIS, individually; ERIK and TIRICA EADS, individually; EUGENE  
10 and CHARLOTTE ELERDING, individually; EVELYN FRAMENT; FORTUNE BUILDERS,  
11 INC.; FRANK ROBERT WALKER JR. and CARRIE ELLEN WALKER, individually as Co-  
12 Trustees of the Walker Jr. Living Trust; FREDERICK and LORI PONCE, individually; GALEN  
13 and MARIA DAVID, individually; GARY HIRSCHKRON, Trustee of the Gary Hirschcron  
14 Revocable Trust; GARY L. WOLFE, SUCCESSOR Trustee of the Carolyn M. Tastad Revocable  
15 Trust; GARY and TERRI MCCASKILL, individually as Trustees of the Mccaskill Family Trust;  
16 GARY SPEEDS and LISA R. KIRBY, individually as Trustees of the Gary Speeds and Lisa  
17 Kirby Family Trust; GELB ENTERPRISES; GEORGE and PAMELA ZELLER, individually;  
18 GEORGE and ROXANNE PELT, individually; GEORGE HERNANDEZ; GEORGE  
19 LAWHEAD, Trustee of the George and Carole Lawhead Revocable Trust; GIRL SCOUTS OF  
20 CALIFORNIA'S CENTRAL COAST; GLENN and LORI AHLBERG, individually; GORDON  
21 and PATRICIA BLACK, individually; GRALAR, LLC; GRAYDON and HELEN HARRAH,  
22 individually; GREGORY and MICHELE HAMMED, individually; GREGORY CAVETTE;  
23 GREGORY GRANT and MARY KING, individually; HANS and ANNIKA GRUENN,  
24 individually; HENDRIKA MARIA VON HECHT; HENRY and GENEVA OLIVA, individually;  
25 HENRY and LESLIE SOHM, individually; HOWARD and IRENE HOOS, individually; HUGH  
26 and LINDSAY THOMSON, individually; INTELL VENTURA, LLC; IRMA TRACY; JACKIE  
27 M. SPRINGER, Trustee of the Jackie M. and Lanie Jo Springer Trust; JAMES and ANDREA  
28 PENDLETON, individually; JAMES and GAYLE DAVID, individually; JAMES and STACI

1 VALENCIA, individually; JAMES and SUE MILLS, individually; JAMES and TRISHA  
2 PROUD, individually; JAMES and ZELDA CARR, individually; JAMES PECK; JAMES I. PIO,  
3 Trustee of the James I. Pio Trust; JAN M. HIESTER, Trustee of the Jan M. Hiester 2014 Living  
4 Trust; JANE E. HANCHETT, Trustee of the Hanchett Family Trust; JANE SPILLER, Trustee of  
5 the Jane Spiller Trust; JANET LEWIS, Trustee of the Janet T. Lewis Family Trust; JANET  
6 PECK, Trustee of the Janet Lee Peck Living Trust; JEANNETTE CURTIS; JEFFREY E.  
7 FRANK, Trustee of the Frank Trust; JEFFREY TUBBS and LYNN DUBOWY DURAN,  
8 individually; JENNIE SCOTT, Trustee of the Jennie Scott Family Trust; JENNIFER WARE and  
9 JAMIE SELBY, individually; JEREMY AUGUST and ICOLE MARIE FERRO, individually;  
10 JESSE WADSWORTH and SUSAN HYND, individually; JESUS CORNEJO and IDANIA  
11 YUDITH CORNEJO, individually; JOAN KENTON, Trustee of the Joan Kenton Living Trust;  
12 JOANNA POPE; JODY CALLEGARI; JOEL HERNANDEZ; JOHANNA COLLINS; JOHN  
13 and LISA DILLARD, individually; JOHN and MARI ALLEN, individually; JOHN and NANCY  
14 BEVANS, individually; JOHN and NILA VENTRESS, individually; JOHN EDWARD and  
15 EVONNE LOUISE VACCA, individually; JOHN GUTIERREZ; JOHN MAZZOLA and APRIL  
16 GOLDEN, individually; JOHN TAFT CORPORATION; JON HANSON; JONATHAN and  
17 JACQUELINE PARKER, individually; JONATHAN and JULIE TEICHERT, individually;  
18 JOSE JUAREZ and ANA VALENCIA, individually; JOSE VALADEZ and NORMA  
19 HERNANDEZ, individually; JOSEPH PALMOUTSOS as Trustee of the Joseph Constantinos  
20 Palmoutsos Living Trust; JOSEPH POLITO, Trustee of the Joseph R. Polito 1989 Trust;  
21 JOSHUA ANTELMAN; JOYCE FRENETTE; JUAN ESPINOZA and TRAVIS COKER,  
22 individually; JUANA and HENRY MURILLO; individually; JUNE M. SPAR, Trustee of the  
23 June M. Spar Living Trust; JUSTIN and RACHAEL JAYNE, individually; KAREN  
24 MENDOZA, Trustee of the Vork Family Trust; KATHERINE PATTON and VIRGINIA  
25 MCCONNELL, individually; KATHLEEN TURNER and ELIZABETH RENN, individually;  
26 KAY BURNS; KEN COLLIN; KENNETH and MARIA BAKER, individually; KENNETH S.  
27 COLLINS, Trustee of the Frank R. Walker, Jr. Trust; KENT and PATRICIA HARDLEY,  
28 individually; KEVIN K. COX and MARY C. COX, individually as Trustees of the Cox Family

1 Trust; KIM JIRKA, Trustee of the Kim Jirka Trust; KONSTANTIN DEMIDOV; KYLE  
2 BROWN; LANCE and DONELLE WOLESAGLE, individually; LARRY and CECILIA  
3 HICKOK, LARRY HUBENTHAL, individually and as Trustee of the Larry Hubenthal Living  
4 Trust; individually; LASZLO and SHARON BIHARI, individually; LASZLO ENGELMAN,  
5 Trustee of the Engelman Family Trust; LAUGHING DOG RANCH, LLC; LAVERNE M.  
6 BROWNING; LAWRENCE and RACHEL CLEVENSON, individually; LEON and CECELIA  
7 CARTER, individually; LEONARD FISCHER; LORENZO GAMA and YLDA CISNERO,  
8 individually; LORETTA MAY WILLIAMS, aka LORETTA MAY BLACKBURN, Trustee of  
9 the Loretta May Williams Revocable Living Trust; LUCILLE JANE CONFORTI and  
10 RANDALL NORMAN KIRK, individually as Co-Trustees of the "Lucille Jane Conforti Trust";  
11 LYNN and ANN HENNE, individually; LYNN GOTCH and LINDA OLIVER, individually;  
12 MANUEL and SANDY GARCIA, individually; MARILYN WALLACE, Trustee of the  
13 MARILYN Wallace Separate Property Trust; MARIO AGUIRRE and PATRICE VERNAND,  
14 individually; MARK and MEGAN STEFFY, individually; MARK ANTHONY and KIM MARIE  
15 CRANE, individually; MARK ROBBINS, Trustee of the MARK ROBBINS Trust; MARK  
16 THOMPSON; MARTIN and DARIAN O'BRIEN, individually; MARTIN and LINDA  
17 GRAMCKOW, individually; MARTIN GRAMCKOW, Trustee of the Monika G. Huss  
18 Irrevocable Trust, Trustee of the Karin W. Gramckow Irrevocable Trust, Trustee of the Kurt J.  
19 Gramckow Irrevocable Trust; MARVEL PIERCE; MARYANN HEPP HILL, Trustee of the Hill  
20 Family Trust; MARY BERGEN, Trustee of the Rosemary Hall Bergen Trust; MARY  
21 MORRISON; MARY WALKART and WILLIAM HASTINGS, individually; MATILJA  
22 CANYON ALLIANCE; MATTHEW and CLAUDIA WILSON, individually; MATTHEW  
23 ARREOLA; MATTHEW BOWE; MATTHEW DWYER and COLLEEN WALKER,  
24 individually; MATTHEW LARREW and JORDANA KABAN, individually; MATTHEW  
25 SIMON and AMANDA VINO, individually; MICHAEL and CAROL DAVIS, individually;  
26 MICHAEL and CINDY BOEHM, individually; MICHAEL and HANNALORE GRESSER,  
27 individually; MICHAEL and KATHY OGDEN, individually; MICHAEL and KIM REGAN,  
28 individually; MICHAEL and MARIE MCTAVISH, individually; MICHAEL and PATRICIA

1 MCWEENEY, individually; MICHAEL COGGINS JR. and CYNTHIA COGGINS, individually;  
2 MICHAEL GREYNALD, Trustee of the Greynald Family Trust; MICHAEL L. ROCKHOLD,  
3 Trustee of the Michael Rockhold Trust; MICHAEL TELLO; MICHELE WILLIS and  
4 JOHANNA COLLINS, individually; MIGUEL A. MAYORGA, Trustee of the Edward R.  
5 Mayorga Living Trust; MITCHAEAL and RUBEENA BREESE, individually; MITCHELL and  
6 ANA YOUNT, individually; MITCHELL and JOY DALBEY, individually; MITCHELL and  
7 LISA MYERS, individually; NANCY MOORE, Trustee of the Nancy Anne Moore Separate  
8 Property Trust; NIKOLAS and JULIA KRANKL, individually; OFFSHORE CRANE, INC.;  
9 OFFSHORE CRANE and SERVICE COMPANY, INC.; OFFSHORE FACILITIES; OJAI  
10 VALLEY CONSERVANCY; ORVILLE and MARION HERNVALL, individually; ORVILLE  
11 and PAMELA HIBDON, individually; OSWALDO and NORMA RUIZ, individually; PACIFIC  
12 TELEPHONE AND TELEGRAPH COMPANY; PAMELA WOOD; PATRIC and MARGARET  
13 PEAKE, individually; PATRICIA and EDWARD LANSBERG, individually; PATRICIA  
14 CUENOT; PATRICK and CATHY PAGNUSAT, individually; PAUL and ANGELA BOOTH,  
15 individually; PAUL and ASHLEY RAMSEY, individually; PAUL and MARIA LOZANO,  
16 individually; PAUL and MARTHA MEDLAR, individually; PAUL and OPAL SKAGGS,  
17 individually; PETER and KELLI FREIBERG, individually; PETER and ROBIN SHEDLOSKY,  
18 individually; PETER BROOKS and CARLA BROOKS, individually and as Trustees of the  
19 Escoda Brooks Family Trust; PETER CAMBIER, Trustee of the Peter and Marilyn Cambier  
20 Trust; PETER SCHEY, LLC; PEUVLIN VONG; PHILIP and DELIA SMITH, individually;  
21 PHILIP FERRANTE JR. and NICOLE AVERSA-FERRANTE, individually; PHILIPPE  
22 ROUSSEAU and KIMBERLY SHOBE, individually; PHYLLIS COURTNEY; RAFAEL  
23 HERNANDEZ; RAMONA L. ANDREW, Trustee of the Ramona L. Andrews Trust; RANCHO  
24 ARNAZ, LLC; RANCHO CASITAS, LLC; RANCHO SUENO, LLC; RAY and CAROLINA  
25 GUILLEN, individually; RAYMOND and ANNETTE WEST, individually; RICHARD and  
26 LAURA MANCILLA, individually; RICHARD and ALEXANDRA DUBEAU, individually;  
27 RICHARD and CYNTHIA ROBINETT, individually; RICHARD BOLTON; RICHARD  
28 MATHIEU and CLAUDIA HERRERA MATHIEU, individually; RICHARD MICHAEL and

1 MARGARET KENNY, individually; RICHARD WILES and PEGGY CAREY, individually;  
2 ROBERT ALAN and STACEY JEAN BOYD, individually; ROBERT and CAROLYN  
3 JARBOE, individually; ROBERT and JUDITH CLARK, individually; ROBERT and NICKEY  
4 GREGORY, individually; ROBERT and PATRICIA MCFALL, individually; ROBERT and  
5 SUSAN BENNITT, individually; ROBERT and ANNA J. AURIC, individually as Trustees of  
6 the Auric Revocable Trust of 1999; ROBERT LEVIN and LISA SOLINAS, individually;  
7 ROBERT MARK and LORRAINE MELISA LOVATO, individually; ROBERT OCONNOR;  
8 ROBERT PETRIN and BEATE SCHICKERLING, individually; ROBERT L. STONE, Trustee  
9 of the Robert L. Stone Revocable Living Trust; ROBERT S. YOUNG, Trustee of the Young  
10 Trust; RONALD and JANIS CALKINS, individually; RONALD KAPLAN and CYNTHIA  
11 DANIELS, individually; RUDOLPH and CAROL SALDAMANDO, individually; RUSSELL  
12 JAMES HALL, Trustee of the Russell James Hall Family Trust; SAM and DEBBIE TUCKER,  
13 individually; SCOTT ALAN and EVA PRINCE WEISS, individually; SCOTT and AKI  
14 FRESHMAN, individually; SCOTT and BERNADETTE KING, individually; SCOTT and  
15 SARAH MCKAY, individually; SCOTT GREGORY EROCKSON and HANNAH BETH  
16 GUZIK, individually; SCOTT R. JOHNSON and MARGARET BATES, individually; SERAFIN  
17 CALDERON and BLANCA ORTIZ; individually; SHANE and AMY WATKINS, individually;  
18 SHANE NASH; SHARON and BRUCE SPENCER, individually; SHARON BROWN, Trustee  
19 of the Sharon Brown Living Trust; SHAUN and DAISY GARMAN, individually; SHIRLEY M.  
20 PALMER, Trustee of the Shirley Palmer Revocable Trust; SKYNEST, LLC; SOCIETE  
21 D'INVESTISSEMENT IMMOBILIERS ET FINANCIERS FRANCO-ALLEMAND, a French  
22 corporation; STANLEY STEPHEN ROSLANSKY and LINDA ROSLANSKY, individually as  
23 Trustees of the Roslansky Family Trust; STEPHEN and CARIN KALLY, individually;  
24 STEPHEN and CINDY BARRACK, individually; STEPHEN CARR and DEBRA GILL,  
25 individually; STEPHEN M. JOHNSON, Trustee of the Stephen M. Johnson Living Trust;  
26 STEPHEN SANFORD; STEPHEN ZANE FRASER; STUART and NANCY RUPP,  
27 individually; SUDARSHAN GAUTAM; SUSAN GARY; SUSAN M. RALPH, Trustee of the  
28 Ralph Trust; SUSAN YARNELL; SUSHMA GUJRAL; SUZANNE RHODES, Trustee of the

1 Bateman-Rhodes Family Trust; T. SNYDER; TAMARRA BARBEY; TANE CHARLES  
2 ARNOLD, individually, and as Trustee of the Tane C. Arnold 2006 Living Trust; TEEN  
3 CHALLENGE OF SOUTHERN CALIFORNIA, INC; TERRA CROWLEY; TERRANCE  
4 O'CONNOR and KATHY FRANKLIN, individually; TERRIE LONGO; THE BAPTISTE  
5 FOUNDATION; THE OJAI VALLEY LAND CONSERVANCY; THEODORE and JUDY  
6 LUCAS, individually; THEODORE and NORMA SCHNEIDER, individually; THEODORE and  
7 TRACY MANDRYK, individually; THEODORE and PEARL MALOS, individually and as  
8 Trustees of the Malos Family Trust; THOMAS and CHRISTINE REED, individually; THOMAS  
9 and NIKKI YOUNG, individually; TIMOTHY and NICOLE BECKETT, individually; TOBIAS  
10 and TANIA PARKER, individually; TODD HENARD and KIBHI MARIE HENARD,  
11 individually; TROPICO, LLC; VICTOR and SHERYL SANCHEZ, individually; VICTORIA  
12 and JOHN JUNKIN, individually; VIDA VIDA, Trustee of the VIDA FAMILY Trust; VIJAY  
13 and NEETA PATEL, individually; VIRGINIA I. WILLIAMSON, individually and as Trustee of  
14 Trust of Virginia I. Williamson; VIRGINIA TREVINO; WALID A. ALAWAR, Trustee of the  
15 Walid A. Alawar Living Trust; WARREN HEATH; WILLIAM and CHERYL MEADE,  
16 individually; WILLIAM and HELEN PECK, individually; WILLIAM and IRENE SNIVELY,  
17 individually; WILLIAM and KIMBRA CARNAGHE, individually; WILLIAM and PAULA  
18 STEVENS, individually; WILLIAM LOUGHBORO; WILLIAM STARR; YONG YI; YVETTE  
19 MARIE and DANIEL JOSEPH SINOHUI, individually; ZACHARY and DIANE TOTTEN,  
20 individually [collectively, "Riparian Landowners"];

21  
22 1300 SHIPPEE LANE, LLC; 3584 CALLE MORENO, LLC; AARON and ANGELA  
23 HOEKSTRA, individually; ABEL and LOURDES CARRANZA, individually; ACSLAYTON,  
24 LLC; ADAM CASEY and BRITTANY CHISUM, individually; ADAM DISTL, JR. and  
25 BARBARA B. DISTL, individually as Trustees of the Adam Distl, Jr. And Barbara B. Distl 1998  
26 Revocable Trust; ADRIAN OGDEN; AERA ENERGY, LLC; AJR INVESTMENT  
27 PARTNERSHIP, LP; ALAN and DEBORAH SHARON, individually; ALAN and LESLIE  
28 CONNELL, individually; ALAN and MARY KIRBY, individually; ALAN and SUSAN ECKER,



1 individually; ALAN WALBRIDGE and DOROTHY FAY WALBRIDGE, individually;  
2 ALBERTO and ADRIANA MONTANO, individually; ALBERTO and HILDA ZAMORA,  
3 individually; ALBINE HOPCUS and ALVA LYDIA HOPCUS, individually as Trustees of the  
4 Al and Alva Trust; ALFONSO and ALEJANDRA LIMON, individually; ALLAN and JANIS  
5 PARKHURST, individually; ALLAN and KATHARINE PARIGIAN, individually; ALLAN and  
6 MARY DOANE, individually; ALLEN VAIL; ALVARO and ELVA RUIZ, individually;  
7 ALVIN and CLAUDIA CUNNINGHAM, individually; ANA CROSS, Trustee of the ANA  
8 CROSS FAMILY Trust; ANDRE KEUNZLI and FABRIENNE KEUNZLI-MONARD,  
9 individually; ANDREW and MELISSA MACCALLA, individually; ANDREW and REBECCA  
10 CHANDLER, individually; ANDREW and SHARON ENGEL, individually; ANGELA JAYNE  
11 GARDNER and JOHN PERCIVAL MAWSON, individually as Trustees of the Pleasant Avenue  
12 Living Trust; ANITA J. DIAZ; ANN H. DONLON, Trustee of the Ann H. Donlon Revocable  
13 Trust; ANNA ARCHER; ANNA KIRKWOOD; ANNE and DANIEL GOLDSTEIN,  
14 individually; ANSON B. THACHER and ANNE F. THACHER, individually as Trustees of the  
15 A. and A. Thacher Living Trust; ANTHONY BECCHIO and DENISE HEIMO, individually;  
16 ANTHONY MASIEL; ANTONIO ESPINO and MARIA TORRES, individually; ARNE  
17 ANSELM and MICHELLE VELDERRAIN, individually; ARNE ANSELM, Trustee of the  
18 Velderrain M. Trust; ASHLEY and VICTORIA EDWARDS, individually; BALDEMAR  
19 ALCANTAR and MICAELA ORTIZ ALCANTAR, individually; BARBARA A.  
20 FITZGERALD, Trustee of the Fitzgerald 1994 Trust; BARBARA BONSIGNORI; BARBARA  
21 CHEN LOWENTHA, Trustee of the 2017 Barbara Kay Chen Lowenthal Revocable Trust;  
22 BARBARA HALL, Trustee of the Barbara Hall Living Trust; BARNARD PROPERTIES, LLC;  
23 BART KENNEDY; BARTON KENNEDY; BERNARD MARTIN; BETH E. LINDLEY;  
24 BETTYANN SESSING; BIG BLACK DOG, LLC; BLAZE BUONPANE; BRADLEY and  
25 ANDREA ROE, individually; BRADLEY and IVELOU PANTOSKEY, individually;  
26 BRANDON and TRESSA KAHLER, individually; BRANDON and KELSIE SCHNEIDER,  
27 individually and as Trustees of the Brandon Schneider and Kelsie Simms-Schneider Family  
28 Trust; BREAL and KAREN ROWE, individually; BRENDAN RICHARD and CHRISTA LEE



1 DAWN FREEMAN, individually; BRENT and PAMELA LAMO, individually; BRETT and  
2 LYNN WILSON, individually; BRETT CUNNINGHAM; BRETT NICHOLSON and NAN  
3 DAVIS, individually; BRIAN and CYNTHIA MCDANIEL, individually; BRIAN and ERIN  
4 EDWARDS, individually; BRIAN and JEAN HARRISON, individually; BRIAN and MARIE  
5 HAASE, individually; BRIAN and SIOBHAN CALVIN, individually; BRIAN A. SCHAFFELS;  
6 BRIAN OSBORNE and KIRSTEN HINRICHS, individually; BRITTANY and ALAN  
7 FLETCHER, individually; BRUCE and LESLIE BOUCHE, individually; BRUCE and  
8 VIRGINIA HIBBERD, individually; BRUCE C. BROCKMAN and BRIDGET TSAO-  
9 BROCKMAN, individually as Trustees of the Tsao Brockman Family Trust; BRYAN and  
10 NICOLE CRAWFORD, individually; BULMARO and ALFONSA PENA, individually; BYRON  
11 and JENNIFER GREENE, individually; BYRON RADER and MYRA TOTH, individually; CAL  
12 B. LAND CO., LLC; CALATLANTIC GROUP INC.; CAMP RAMAH IN CALIFORNIA INC.;  
13 CARL and JUDITH BELL, individually; CARL and LEIGH HYNDMAN, individually; CARL  
14 GADDIS and ANNA HICKS, individually; CARLA DENNIS, Trustee of the Carla D. Dennis  
15 Trust; CARLA MELSON and CARLA J. MELSON, individually as Trustees of the Carla J.  
16 Melson Revocable Living Trust; CARMEN and CAROLINA MURILLO, individually; CAROL  
17 MARQUEZ-OLSON, Trustee of the Carol Marquez-Olson Trust; CAROL VESECKY, Trustee  
18 of the Carol B. Vesecky Revocable Living Trust; CAROLINE TURNER, Trustee of the Turner  
19 Survivors Trust; CAROLYN BOWMAN, Trustee of the Carolyn Bowman 2008 Trust;  
20 CAROLYN HUIH; CARYN MOLINELLI; CATHERINE LANCASTER; CATHERINE  
21 SELLMAN; CATHERINE SMITH, Trustee of the Catherine L. Smith Revocable Trust; CESAR  
22 and DAVIENNE GUERRA, individually; CESAR JIMENEZ and AURA MINERA,  
23 individually; CHAARENNE TORRIS and RAYMOND BRADLEY, individually; SOUTHERN  
24 CALIFORNIA ASSOCIATION OF SEVENTH DAY ADVENTISTS; CHAD CARPER; CHAD  
25 RESS and STEPHANIE WASHBURN, individually; CHAD VICK, Trustee of the Chad C. Vick  
26 Trust; CHARLENE VAN DEUSEN; CHARLES and DEANA SHERRY, individually;  
27 CHARLES and JO BENNETT, individually; CHARLES G. BARNETT, SUCCESSOR Trustee  
28 of the "Barnett Family Exemption Equivalent Trust"; CHARLES L. HOFF and KATHLEEN D.

1 HOFF, Co-Trustees of the Hoff Revocable Trust; CHARLES MONN and ELENA HALE,  
2 individually; CHARLES R. RUDD and LOLA L. RUDD, Trustees Under the Charles R. Rudd  
3 and Lola L. Rudd Trust; CHRISTIE MATTULL, Trustee of the Christie Lynn Mattull Trust;  
4 CHRISTINE and DONALD BOWEN, individually; CHRISTINE GOLDEN; CHRISTOPHER  
5 and ANNA RHODA, individually; CHRISTOPHER and GILLIAN BORGESON, individually;  
6 CHRISTOPHER and SHELAGH DUKE, individually; CHRISTOPHER CORSONES, Trustee of  
7 the Christopher Corsones Living Trust; CHRISTOPHER MCGUIRE; CHRISTOPHER  
8 SEWELL; CHRISTOPHER WEINER and DAMIAN BOURGUET, individually; CINDY  
9 BURKHART, Trustee of the Cindy Burkhardt Living Trust; CITY OF OJAI; CLAUDIA FARR,  
10 Trustee of the Sam S. Farr And Claudia S. Farr Trust; CLAUDIA WUNDERLICH, Trustee of the  
11 Claudia A Wunderlich Trust; CLEMENTINE TURNER, Trustee of the Clementine Turner  
12 Living Trust; CODY GREEN; CODY STEVENS; CONNIE ANAISE; CONNIE and MARK  
13 CLINE, individually as Trustee of the Mark Terry Cline Family Trust; CONSTANCE EATON;  
14 CORY and NICHOLAS WINGATE, individually; COUNTY OF VENTURA; CRAIG and  
15 STEPHANIE GARDNER, individually; CRAIG YOUNG and DANIEL POLING, individually;  
16 CULBERT FAMILY PARTNERSHIP; CURTIS and CHRISTINA TOLMIE, individually;  
17 CYNTHIA ELLIS and PAMELA THOMAS, individually; DAJ PROPERTIES, LLC; DAMIAN  
18 and LORIE VOS, individually; DAMON and ANNE BRINK, individually; DANIEL and  
19 ADAYA WALSH, individually; DANIEL and DEBORAH HOYT, individually; DANIEL and  
20 ELIZABETH GEORGE, individually; DANIEL and ELIZABETH MCLAUGHLIN,  
21 individually; DANIEL and JANE KELLY, individually; DANIEL and LYDIA RUARK,  
22 individually; DANIEL and RALPH FAIRBANKS, individually; DANIEL and TOMICA MORA,  
23 individually; DANIEL and YOKO MCSWEENEY, individually; DANIEL CHRYNKO;  
24 DANIEL CRANE; DANIEL H. I. and WILLIAM D. MOSES JR., individually as Trustees of the  
25 William D. Moses, Jr. Separate Trust No. 1; DANIEL HULTGEN, Trustee of the Hultgen Living  
26 Trust; DANNY HAAR and MARISKA DE FEITER, individually; DARRELL RALSTON,  
27 Trustee of the Darrell Anthony Ralston 2009 Revocable Trust; DAVE and KATHLEEN  
28 TARRATS, individually; DAVID and BEVERLY FULTON, individually; DAVID and CAROL

1 CINTRON, individually; DAVID and DEBORAH TODD, individually; DAVID and DONNA  
2 BERGER, individually; DAVID and ELIZABETH SILVA, individually; DAVID and  
3 FERESCHTA SINCLAIR, individually; DAVID and KAREN BRUBAKER, individually;  
4 DAVID and KATHLEEN OSTBY, individually; DAVID and LAURA MEISCH, individually;  
5 DAVID and LAURIE MAHAN, individually; DAVID and MEGHAN SANDOVAL,  
6 individually; DAVID and MINDY BENEZRA, individually; DAVID and PEGGY  
7 STANWOOD, individually; DAVID and SANDRA MURILLO, individually; DAVID and  
8 SHANNON RICHARD, individually; DAVID and SHARRON SPARKS, individually; DAVID  
9 and STEPHANIE BERGER, individually; DAVID and TONI JOHNSON, individually; DAVID  
10 COREY and JEAN SCHOLES, individually; DAVID E. PRESSEY and AGNES E. PRESSEY,  
11 individually as Trustees of the David E. And Agnes E. Pressey Family Trust; DAVID KILLE and  
12 SHANNON FREW, individually; DAVID L. GARBER and CYNTHIA GARBER, individually  
13 as Trustees of the Garber Trust; DAVID ORBACH and EVA ARAUJO, individually; DAVID  
14 STANLEY and MONICA BEDNAR STANLEY, individually; DAWN and BARCLAY HOPE,  
15 individually; DE and JACQUE PISCIOTTA, individually; DEAN and GLORIA VADNAIS,  
16 individually; DEAN and LORINDA STRONG, individually; DEANNA GONZALES,  
17 individually; DEIRDRE LYNDS, individually; DELAVAN C. GARST and SHARON D.  
18 GARST, individually as Trustees of the Delavan and Sharon Garst Family Trust; DELL and  
19 ANNE MERCER, individually; DELORES and JERRY BERLIN, individually; DENISE  
20 WIZMAN, as Trustee of the Denise Wizman Revocable Trust; DENNIS and CHERYL JACOBS,  
21 individually; DENNIS and NADINE CORTE, individually; DEREK MEEK; DEVON and  
22 JILLIANN COLLINGE, individually; DIANA ENGLE, Trustee of the Diana L Engle Revocable  
23 Trust; DIANA PERON, Trustee of the Diana C Peron Living Trust; DIANA SYVERTSON,  
24 Trustee of the Diana Syvertson Living Trust; DIANA TRENT, Trustee of the Diana Trent Living  
25 Trust; DIANE and WILLIAM CLEGG, individually; DIANNE MCCOURTNEY, Trustee of the  
26 Dianne Louise McCourtney Trust; DOLORES KEITH; DOMINIC HABIBI; DONALD and  
27 CLARA TENPENNY, individually; DONALD BROSNAC and TWILA CARLSEN,  
28 individually; DONALD DAVIS; DONALD G. and SUSAN B. DAVIS, individually as Trustees

1 of the Donald G. And Susan B. Davis Revocable Family Trust of 1997; DONIS MONTOYA JR.  
2 and TERESITA MONTOYA, individually; DONNA DEITCH, Trustee of the DONNA E.  
3 DEITCH Trust; DONNA EPSTEIN, Trustee of the Epstein Survivors' Trust, Trustee of the  
4 Epstein Marital Trust, and Trustee of the Epstein Bypass Trust; DOROTHY and JAMES  
5 KEHOE, individually; DORTHEA KECK; DOUGLAS and ANN PARENT, individually;  
6 DOUGLAS and CLAUDIA WEBBER, individually; DOUGLAS and ELISABETH VERNAND,  
7 individually; DOUGLAS and KATHLEEN LEIGHTON, individually; DOUGLAS and MOIRA  
8 VOLPI, individually; DOUGLAS DRAPER; DOUGLAS WASSON, Trustee of the Wasson  
9 Trust; DUSTIN BEILKE; ED and LINDA COLBY, individually; EDSON TAFT, Trustee of the  
10 Edson B. Taft Revocable Trust; EDWARD and DEBORAH GUERRA, individually; EDWARD  
11 and LAURA SAVALA, individually; EDWARD and NANCY DENNIS, individually;  
12 EDWARD and NANCY NECKER, individually; EDWARD and ROBERTA WALSH,  
13 individually; EDWARD DUNN and JUDITH SHELBY DUNN, individually; EDWARD  
14 PRESSEY; EDWIN NORRIS PROCTER, Trustee of the "E. Norris Procter Living Trust";  
15 EILAM BYLE, Trustee of the Eilam Byle Living Trust; EILEEN STERLING, Trustee of the  
16 Eileen M. Sterling Revocable Trust; EILEEN WALKER; EL SERENO 1225, LLC; ELAIENE  
17 KEELEY, Trustee of the Elaiene Keeley Trust; ELAINE FERGUSON; ELI and JESSICA  
18 NEIDERHISER; ELIA ALDAPA; ELIZABETH BAUER, Trustee of the Elizabeth A Bauer  
19 Trust; ELLEN LEOPOLD; ELMER and JOAN SWIFT; EMILY BENSON and LISA MARTEL,  
20 individually; EMILY CLAY and MATTHEW GOODMAN, individually; ERBAY and VELDA  
21 GARCIA, individually; ERIC and ARLENE SCHWERDTFEGER, individually; ERIC and  
22 JOLENE HARRINGTON, individually; ERIC BUSH and CRAIG YOUNG, individually; ERIC  
23 DILKS, Trustee of the Eric M. Dilks 2004 Revocable Trust; ERIC GOODE; ERIC MOORE;  
24 ERIC ROSENBERG; ERNEST and DOROTHY NICHOLS, individually; ERNEST  
25 THORNSBERRY, Trustee of the Ernest Thornsberry Revocable Trust; ESPERANZA and  
26 SANDRA GUERRERO, individually; EUGENIJUS VALIULIS, Trustee of the Eugenijus  
27 Valiulis Revocable Living Trust; EUSEBIO and LORI NAVARRO, individually; EVELYN  
28 BARAN, Trustee of the Evelyn F Baran Personal Residence Trust; EZEQUIEL and AMBER

1 MONARREZ, individually; FELIX and DELMY GARCIA, individually; FERNANDO  
2 PORRAS; FEROZ and MONA ZAIDI, individually; FINCH FARMS, LLC; MEREWETHER  
3 JUDSON, LLC; FLOYD and CHARLENE FITZGERALD, individually; FLOYD EUGENE  
4 WIANCKO and HIROKO WIANCKO, Trustees of the Wiancko Family Trust; FOREST HOME,  
5 INC.; FORTUNE REAL ESTATE 888, LLC; FRANCIS and SHAUNA LONGSTAFF,  
6 individually; FRANCISCO and ANGELICA VALLES, individually; FRANK and LILA  
7 SHELSTREN, individually; FRANK C. URIAS and EVANGELINE S. URIAS, individually as  
8 Trustees of the Urias Family Trust; FRANK CHAROLLA; FRANK EDWARD SHELSTREN,  
9 JR., aka FRANK E. SHELSTREN and RITA CHERYL SHELSTREM, individually as Trustees of  
10 the Shelstren Family Trust; FRED and CARINE FISHER, individually; FRED and DONNA  
11 STEVENS, individually; FRED KRAMER and MICHAELA WATKINS, individually;  
12 FREDERIC DEVAULT; FREDERICK and LAURA FULMER, individually; FREDERICK  
13 SLOMAN and NORDI HINTZE, individually; FREDRICK and ROXANNE BAKER,  
14 individually; FUTURE MHPS, LLC; GABRIEL and MARGARITA MENDOZA, individually;  
15 GALE and BERNABE GAONA JR., individually; GARY and CHARI PETROWSKI,  
16 individually; GARY and COLLEEN FRY, individually; GARY and JOLENE CLARKE,  
17 individually; GARY and JUDITH STEVER, individually; GARY and PATRICIA TUCKER,  
18 individually; GARY and TERESA DOWNARD, individually; GENE and PATTY SAITO,  
19 individually; GENNEVA MASCHLER and RICHARD YACIUK, individually; GEOFFREY and  
20 PAULA CLARKE, individually; GEOFFREY BROWN and STEPHANIE GIBSON,  
21 individually; GEORGE and LINDA BOSTON, individually; GEORGE and LYNN MALONE,  
22 individually; GEORGE and MARGARET MELTON, individually; GEORGE and SIGRID  
23 BRESSLER, individually; GEORGE STUART; GERALD and DARLENE CARLSON,  
24 individually; GERARD LINSMEIER; GERBEN and JILL HOEKSMA, individually; GINO  
25 LYNCH; GLENN MYERS, Trustee of the Glenn C. Myers Family Trust; GORDON and TERRY  
26 HANUSEK, individually; GORDON GIBBONS, Trustee of the Gordon R. Gibbons Living Trust;  
27 GRANT KEMP; GREG and JULIE TEBO, individually; GREGG and ROSIE DIERICKX,  
28 individually; GREGG OLSON, Trustee of the Gregg W. Olson Revocable Trust; GREGORY and

1 KAORI GOLDEN, individually; GREGORY and MARTHA LEPINE, individually; GREGORY  
2 and SARAH DELVECCHIO, individually; GREGORY and SUSAN GILBERT, individually;  
3 GREGORY and SUSAN IGNACIO, individually; GREGORY and SUZANNE COMBS;  
4 GREGORY HERAS and ROZANNE BONAVIDO, individually; GREGORY JOHNSON;  
5 GREGORY N. PIMSTONE and LAURYN B. HARRIS, individually as Trustees of the Pimstone  
6 Family Trust; GRIFFIN and NICOLE WILLIAMSON, individually; GUDAZ, LLC; GUY and  
7 SHERI FLASCH, individually; GUY BRATTON; H and BEVERLY LEARD, individually;  
8 HACIENDA LADERA, LLC; HANK and ALANA GARCIA, individually; HANS and EILEEN  
9 VAN KOPPEN, individually; HARALD WAGNER; HARLAN KOSSOW; HARRISON HILL  
10 and LAUREN WILSON, individually; HARRY and MARILYN LEHR, individually; HARRY  
11 JOE; HAYDEN and RAQUEL WHITE, individually; HECTOR and ROCIO TORRES,  
12 individually; HEIDI C. KURTZ, Trustee of the Gunild Walsh Seadrift Qprt FBO Heidi C. Kurtz;  
13 HELIBERTA VALENCIA; HELP OF OJAI, INC.; HENRY and MOIRA TARMY, individually;  
14 HERMANN and GAY THOMSEN, individually; H. H. LEARD and BEVERLY LEARD,  
15 individually as Trustees of the Leard Family Trust; HICKEY BROS LAND CO. INC.; HOLLY  
16 BASSUK; HOWARD and RUTH MILLER, individually; HOWARD ALTMAN, Trustee of the  
17 Gerta Maritz Trust; HOYT TAROLA; IAN and CAROL ATKINSON, individually; IGNACIO  
18 and ROSE VEGA, individually; IMELDA MARES, Trustee of the Imelda Mares Trust;  
19 INDUSTRIAL VENTURA; INTEGRITAS OJAI, LLC; IRMA CRUZ; IRSHAD and LINDA  
20 HAQUE, individually; ISIDRO SANCHEZ; J INVESTMENTS; J MCGLINCHEY; JACK and  
21 MARIE KENTON, individually; JACK and SIMONE PATTERSON, individually; JACK and  
22 VERA TURBYVILLE, individually; JACOB and ANJA ZIMMERMAN, individually;  
23 JACQUELINE DORFMAN, Trustee of the Jacqueline Dorfman Revocable Living Trust;  
24 JACQUELINE URBAND; JAKOB and MARIANNE VOS, individually; JAMES and ALISA  
25 VARNEY, individually; JAMES and DANIELA CASEY, individually; JAMES and DORI  
26 SANDEFER, individually; JAMES and JANET LECROY, individually; JAMES and LAURA  
27 FERNANDEZ, individually; JAMES and MARYETTA SANDERS, individually; JAMES and  
28 PENNY HARVEY, individually; JAMES and RANDI CATLETT, individually; JAMES and

1 WENDY OSHER, individually; JAMES DATA; JAMES FINLEY, Trustee of the James And M.  
2 Reen Finley Family Trust; JAMES FINCH, Trustee of the Finch Family Trust; JAMES J. FINCH  
3 and LORRAINE HOLVE FINCH, individually as Trustees of the James J. Finch and Loraine  
4 Holve Finch Living Trust; JAMES PAUL FINCH; JAMES KIRK and JACELYN HAYES,  
5 individually; JAMES SELMAN, Trustee of the JAMES C. SELMAN REVOCABLE INTER  
6 VIVOS Trust; JAMES W. COULTAS and MARGARET COULTAS, Trustees of the James A.  
7 And Margaret H. Coultas Intervivos Trust; TERRY COULTAS WILSON; JAMES W.  
8 COULTAS Trustee of the Coultas Living Trust; JAN and PRISCILLA GRANADE, individually;  
9 JANE MCCORD, Trustee of the Jane Ann Mccord Living Trust; JANET MCGINNIS, Trustee of  
10 the Janet Karen McGinnis Trust; JANICE and JESSE HILLESTAD, individually; JANICE  
11 HALL, Trustee of the HALL Trust; JANIS LONG NICHOLAS and JESS E. LONG, individually  
12 as Co-Trustees of the Long Family Trust; JASON and JENE LOOMIS, individually; JASON and  
13 KATHRYN HEADLEY, individually; JASON and LANA SPEAR, individually; JASON  
14 LOOMIS; JASPER and JESSICA JONES, individually; JAYNE PENDERGAST, Trustee of the  
15 2014 Jayne E Pendergast Trust; JEFF and CHEREE SIMONS, individually; JEFF and DESIREE  
16 WILBY, individually; JEFF MABRY; JEFFERIE SKAGGS and TIMOTHY BUNCE,  
17 individually; JEFFREY and DENISE HELM, individually; JEFFREY and DONNA MEYER,  
18 individually; JEFFREY and HOLLY LIEBER, individually; JEFFREY JENSON; JEFFREY  
19 KENTON, Trustee of the Jeffrey T. Kenton 2004 Revocable Living Trust; JEFFREY S. BACON,  
20 Trustee of the Villa Nero Trust; JEFFREY WEINSTEIN; JEFFRY and FIONA POUGHIER,  
21 individually; JENNIFER KISTLER, Trustee of the Jennifer L Kistler Trust; JEREMY and  
22 BRITTANIA RENNIE, individually; JERI LEONARD; JEROME H. HITTLEMAN and LYNNE  
23 M. GOLDFARB, Trustees of the Jerome H. Hittleman And Lynne M. Goldfarb Revocable 2016  
24 Trust; JERRY DEAN MINER and GERALDINE ANN MINER, Trustees of the Miner Trust;  
25 JESS EARL LONG; JESSIE STRICCHIOLA and ROSEMARY GARRISON, individually as  
26 Trustees of the Phoenix Revocable Trust; JESUS and MARIA RAMOS, individually; JILL  
27 OLIVARES, Trustee of the Jill Ann Olivares Revocable Living Trust; JIMMY and THERESA  
28 RAMIREZ, individually; JLB RANCHO VISTA, LLC; JOAN GEDDES and JOHN SALUPPO,



1 individually; JOAN ROBLES; JOANN BENSON, Trustee of the Joann Alva Benson Revocable  
2 Living Trust; JOANNE BARNES, Trustee of the Barnes Family Trust; JOEL FOX and  
3 JENNIFER DAY, individually; JOEL VUYLSTEKE, Trustee of the Country Club Trust;  
4 JOHANNA RAE LONG; JOHN and A. ELROD, individually; JOHN and ALITEA  
5 MARUSZEWSKI, individually; JOHN and CRYSTAL PEAKES, individually; JOHN and  
6 JANIS NICHOLAS, individually; JOHN and LUCILLE ELROD, individually; JOHN and  
7 MONICA HARTMANN, individually; JOHN and NORMA CURTIS, individually; JOHN and  
8 PARRIS COLLINS, individually; JOHN and PATRICIA ESSICK, individually; JOHN and  
9 TONYA PERALTA, individually; JOHN and VICTORIA BORTOLUSSI, individually; JOHN  
10 BATTEL, Trustee of the John J Battel Living Trust; JOHN BROOMFIELD, Trustee of the John  
11 Nicholas Broomfield Trust; JOHN F. JOHNSTON and KATHERINE M. JOHNSTON,  
12 individually as Trustees of the John Fraser Johnston Family Trust; JOHN HAIGH, JR.; JOHN  
13 KERTIS; JOHN MUTLOW; JOHN PACE, Trustee of the John Brice Pace Family Trust; JOHN  
14 RICHARDSON; JOHN VINEYARD; JOHN WARNER and JENNIFER DUNN, individually;  
15 JOHN WILLINGHAM; JOHN WINSPEAR; JOHN YOUNG; JONATHAN WONG and JAN  
16 KOMURA, individually; JOSE and IMELDA HURTADO, individually; JOSE and LISA  
17 MENDEZ, individually; JOSE ARREOLA JR. and PAOLA CARRENO, individually; JOSE  
18 OLVERA and ALMA VALENCIANO, individually; JOSEPH and DRENDA PLEDGER,  
19 individually; JOSEPH LYNN and ELVIRA LILLY BARTHELEMY, individually and Trustees  
20 of the Joseph Lynn Barthelemy and Elvira Lilly Barthelemy 2002 Family Trust; JOSEPH and  
21 KATHLEEN LASALLE, individually; JOSEPH and MICHELLE HARWELL, individually;  
22 JOSEPH and NINA NEULIGHT, individually; JOSEPH and SHIRLEY GHOLSON,  
23 individually; JOSEPH LAM; JOSEPH RANDALL, Trustee of the Joseph Darden Randall  
24 Revocable Trust; JOSEPH RESEIGH; JOSEPH TOOKER; JOSHUA and JENNIFER  
25 GOLDSTEIN, individually; JOSHUA MOREAU; JOYCE and FRANK PATOTA, individually;  
26 JUAN and GLORIA ESTRADA, individually; JUAN and MARIA MARTINEZ, individually;  
27 JUDITH REICHMAN and HAROLD BROWN, individually; JULIANNE BLOOMER and  
28 PHILIP RABE, individually; JULIE CENTENO; JULIO LUNA and DEBBIE LUN, individually;

1 JUNE SEARS, Trustee of the June Katherine Sears Living Trust; JUPETO PROPERTIES, LLC;  
2 KAC LLC; KAREN L. HANSON and LAWRENCE S. HANSON, Trustees of the Hanson L.S.  
3 Revocable Living Trust; KAREN PHIPPS, Trustee of the Phipps Family Trust; KARIN DRON,  
4 Trustee of the Boyd S. Dron and Karin K. Dron Joint Living Trust; KARIN L. JAMES, Trustee  
5 of the James Family Trust; KARL and BEVERLEY MALLETT, individually; KATHARINE  
6 and JOHN BROESAMLE, individually; KATHLEEN and ADAM MORRISON, individually;  
7 KATHLEEN and THOMAS GERMAN, individually; KATHLEEN BACHELOR; KATHLEEN  
8 NOLAN, Trustee of the Kathleen Ann Nolan Revocable 2006 Family Trust; KATHRYN  
9 BARTHOLOMEW, Trustee of the Kathryn Oconnor Bartholomew Living Trust; KATHY  
10 ALDERMAN; KATZ PINCETL ORCHARD, LLC; KAY DORNBUSCH, Trustee of the  
11 Dornbusch Family Living Trust; KEITH and ANAHID JEWETT, individually; KEITH and  
12 ROBIN LAWSON, individually; KEITH and VICTORIA NIGHTINGALE, individually;  
13 KELLEY and JOHN DYER IV, individually; KELVIN DODD and DEBORAH GOMEZ,  
14 individually; KENETT NIESSEN; KENNETH and ANNE BOYDSTON, individually;  
15 KENNETH and BRENDA WHITTEKER, individually; KENNETH and CAROL FERGESON,  
16 individually; KENNETH and ELIZABETH GRUBER, individually; KENNETH and LAURA  
17 BROWN, individually; KENNETH and MICHAEL BALLARD, individually; KENNETH and  
18 SARAH VAN DYKE, individually; KENNETH MORGAN; KENNETH VADNAIS; KERN  
19 COUNTY; KEVIN and ASLI RUF, individually; KEVIN and JENNIFER WHITE, individually;  
20 KEVIN and JOANNE OLSLAND, individually; KEVIN and JODI DUNN, individually;  
21 KHALED A. AL-AWAR and SHERYL L. AL-AWAR, individually as Trustees of the K. and S.  
22 Al-Awar Family Trust; KIKI LYON, Trustee of the Kiki Lyon Living Trust; KIM HANNA,  
23 Trustee of the Hanna Family Trust; KRISTAN ALTIMUS; KURT and DAYNA  
24 ROGGENSTROH, individually; KURT and LUISA NEHER, individually; KURT PATRICK  
25 ZIERHUT and STEPHANIE LEE ZIERHUT, Co-Trustees of the Living Trust of Kurt Patrick  
26 Zierhut and Stephanie Lee Zierhut; LANSRING, LP; LARRY and JOYCE HEATH,  
27 individually; LARRY DAVIS; LARRY HUBENTHAL, Trustee of the Larry Hubenthal Living  
28 Trust; LARRY NEFF, Trustee of the Larry Neff Trust; LAS ENCINAS MOBILE HOME PARK;

1 LAURA B. PECK and ANDREW D. VILES, individually as Trustees of the William L. and  
2 LAURA B. PECK Trust - Marital Trust; LAURA GREEN, Trustee of the Green Survivors Trust;  
3 LAURIE JOHNSON, Trustee of the Laurie A. Johnson Living Trust; LAURIE SMITH;  
4 LAWRENCE and SHARON MCMILLAN, individually; LAWRENCE I and PATRICIA A.  
5 HARTMANN, individually as Trustees of the Larry and Pat Hartmann Family Trust; LEE and  
6 JANET CASSEL, individually; LEE FITZGERALD, Trustee of the Lee I Fitzgerald 2007  
7 Revocable Living Trust; LEE LEBECK; LEE ROSENBAUM, Trustee of the Chief Cornerstone  
8 Trust; LEON and CAROLINE PAHLE, individually; LEONARD PETITT and KAY ROLFE,  
9 individually; LESLEE and TERRY GUSTAFSON, individually; LESLIE MCCLEARY;  
10 LESTER L. and LINDA L. BARBEE, individually as Trustees of the Lester L. Barbee and Linda  
11 L. Barbee Joint Revocable Living Trust; LIANA HARP and NATHAN JONES, individually;  
12 LILIAN RUVALCABA; LINDA CHAPMAN, Trustee Linda of the Jean Chapman Living Trust;  
13 LINDA GRIFFIN; LINDA MCLAUGHLIN, Trustee of the Linda Landrieu McLaughlin Living  
14 Trust; LINDA OLIVER, Trustee of the Linda A Oliver 2005 Revocable Living Trust; LIPKA  
15 RICHARD, Trustee of the Lorraine Trust; LISA LOPEZ and BRIAN MERRILL, individually;  
16 LISA SMITH and NATHANIEL COX, individually; LLOYD SMITH; LOGAN and MISTY  
17 HAGEGE, individually; LOGAN and TIFFANY GOULD, individually; LOIS STONE  
18 ERBURU, as Trustee of the Surviving Spouse's Trust Created in the Robert and Lois Erburu  
19 Living Trust; LON and MARGARETA KIRKGAARD, individually; LONGHORN LANE, LLC;  
20 LORENE CLEARY; LORI SCHLOREDT; LOU and BARTON MATTHEWS, individually;  
21 LOUIS GUTIERREZ, JR. and IRENE GUTIERREZ, individually; LOUIS PRICE; LOUISE and  
22 GARY CULVER, individually; LOUISE KONSTANZER, Trustee of the Ron and Louise  
23 Konstanzer Family Trust; LOUISE TINDLE, SOLE Trustee of the "Bypass Trust" Created Under  
24 The Tindle Trust; LUIS HERRERA and KIMBERLY OYAMA, individually; LUPE MILNER,  
25 Trustee of the Lupe Milner Family Trust; LYDIA JIMENEZ; LYLE and CECILIA  
26 HALLBLOM, individually; LYNDON HEBENSTREIT; LYNN COLEMAN; LYNN PIKE,  
27 Trustee of the Lynn 2016 Trust; LYSIANE WALLIS; M. SNYDER; MALCOLM and BRENDA  
28 KNIGHT, individually; MALCOLM and KELLEY MCDOWELL, individually; MANDY

1 MACALUSO, Trustee of the Living Trust of Mandy Macaluso; MANUEL ALMEIDA and  
2 KEVIN BAGLEY, individually; MARCUS and AMY HUEPPE, individually; MARCUS and  
3 EVA KETTLES, individually; MARGARET M. ALDRICH, Trustee of the Russell F. Aldrich  
4 and Margaret M. Aldrich "Decedent's Trust," and Trustee of the Russell F. Aldrich and Margaret  
5 M. Aldrich Living Trust; MARGO KELLY, Trustee of the Kelly Trust; MARIA BLASCO;  
6 MARIA COLLINS; MARIE W. WALLACE, Trustee of the Marie Weismiller Wallace Separate  
7 Property Trust; MARIKA ZOLL; MARILYN SWEENEY, Trustee of the Marilyn Sweeney  
8 Revocable Living Trust; MARIO and SHAWN REYES, individually; MARION and BETTY  
9 EARNEST, individually; MARK and COLLEEN RUSIN, individually; MARK and CONNIE  
10 CLINE, individually; MARK and HELEN MOSKOVITZ, individually; MARK and MARCIA  
11 ALBERTSEN, individually; MARK BELLINI; MARK W. ETCHART, Trustee of the Mark W.  
12 Etchart Separate Property Trust, and Trustee of the Michel A. Etchart Separate Property Trust;  
13 MARSHA MACDONALD; MARSHALL and DINA MURPHY, individually; MARTHA FAST,  
14 Trustee of the Martha L Fast Living Trust; MARTHA LALIBERTE; MARTHA MORAN;  
15 MARTIN and BARBARA POPS, individually; MARTIN and NATALIE EHRLICH,  
16 individually; MARTIN and PATRICIA HENDERSON, individually; MARY and THOMAS  
17 SNOW, individually; MARY DOWNER, Trustee of the Arthur and Mary Downer Family Trust;  
18 MARY L. VOMUND, Trustee of the Mary L. Vomund 1987 Trust; MARY THOMAS, Trustee  
19 of the Thomas Survivors Trust; MARY WINGATE, Trustee of the Mary Louise Wingate Trust;  
20 MATTAWA and ROND LARUE CLEMENTS, individually; MATTHEW and JUDY FARMER,  
21 individually; MATTHEW and KIMBERLY HULTGEN, individually; MAX REED;  
22 MAXIMIANO and NORMA ORTIZ, individually; J. MCGLINCHEY; MCNELL CREEK  
23 RANCH, A GENERAL PARTNERSHIP; MCNELL PROPERTIES, LLC; MELESIO  
24 RAMIREZ; MELISSA VAN SICLEN; MERL and KIM MELSTRAND, individually;  
25 MICHAEL and ALLISON SEDLAK, individually; MICHAEL and ANNELL LA BARGE,  
26 individually; MICHAEL and BARBARA MCCARTHY, individually; MICHAEL and  
27 BERNARD CLARK, individually; MICHAEL and CAROL JACKSON, individually;  
28 MICHAEL and DIANNA FARRAR, individually; MICHAEL and HEIDI BRADBURY,

1 individually; MICHAEL and KIMBERLY ROBERTSON, individually; MICHAEL and NANCY  
2 KRUMPSCHMIDT, individually; MICHAEL and SHARON WILLIAMS, individually;  
3 MICHAEL and SONJA BARRETT, individually; MICHAEL and TERRI IMWALLE,  
4 individually; MICHAEL CHAMBLISS; MICHAEL HOOVER, Trustee of the Michael Hoover  
5 Living Trust; MICHAEL KELLEY; MICHAEL L. DELAMORE and DEBORAH FINLEY-  
6 DELAMORE, individually as Trustees of the Delamore Finley Family Trust; MICHAEL  
7 LOMBARDO, Trustee of the Michael Lombardo Living Trust; MICHAEL MARIETTA,  
8 individually and as Trustee of the Marietta Separate Property Trust; MICHAEL PRENTICE;  
9 MICHAEL PURDY, Trustee of the Purdy Family Revocable Trust; MICHAEL SALEH, Trustee  
10 of the Saleh and Lea Saleh 1984 Family Trust; MICHAEL T. MARSHALL and LISA  
11 SKYHEART MARSHALL, individually as Trustees of the Marshall Living Trust; MICKY  
12 FROELICH; MIGUEL and ELVIA RAMIREZ, individually; MIGUEL ESTRADA; MURELLE  
13 STEVENS, Trustee of the Stevens Family Trust; NANCY FERRELL, Trustee of the Nancy A.  
14 Ferrell Family Trust; NANCY GRAHAM; NANCY JACKSON, Trustee of the Nancy J. Jackson  
15 Living Trust; NATALIA MOORE, Trustee of the Moore Family Trust; NATHAN ALLEN;  
16 NATHANIEL and SUZETTE O'GRADY, individually; NATHANIEL TRAUDT and KAREN  
17 TRAUDT, individually and as Trustees of the Traudt Family Trust; NEIL and PATRICIA  
18 FRIEDRICHSEN, individually; NEIL KREITMAN, Trustee of the Neil Kreitman Living Trust;  
19 NICK and MORNA TAMINICH, individually; NICK DAILY; NINA MENCONI; NYE  
20 RANCH, LLC; OAK HAVEN, LLC; OAK VIEW SANITARY DISTRICT; KRISHNAMURTI  
21 FOUNDATION OF AMERICA; OILFIELD SERVICE and TRUCK CO.; OILFIELD SERVICE  
22 and TRUCK, INC.; OJAI ASSEMBLY OF GOD, INC., DBA OJAI'S CHURCH OF THE  
23 LIVING CHRIST, INC.; OJAI HOME, LLC; OJAI UNIFIED SCHOOL DISTRICT; OJAI  
24 VALLEY ATHLETIC CLUB; OJAI VALLEY LAND CONSERVANCY; OJAI-JACKMAN,  
25 LLC; OLE BEHRENDTSEN; OLGA and TRENT JONES, individually; ORIN JR. and KAREN  
26 CHAPPELL, individually; ORVILLE HERNVALL, Trustee of Hervnall Orville and Marion  
27 Orville Trust; OSCAR and MARY KAAS, individually; OSCAR ACOSTA, Trustee of the  
28 Acosta Trust; OST TRUCKS and CRANES; OVIS, LLC; PAMELA GRAU, Trustee of the

1 Pamela Grau Living Trust; PAMELA MELONE, Trustee of the Pamela M. Melone Living Trust;  
2 PATRICIA BOAN and ALINA HOFFMAN, individually; PATRICIA BOAN and JOHN  
3 HOFFMAN, individually; PATRICIA MARSHALL, Trustee of the Patricia Ann Marshall Trust;  
4 PATRICIA MCPHERSON; PATRICIA MCGANN; PATRICIA UNRUHE and ANDREW  
5 JARVIS, individually; PATRICK HENDERSON and JESSICA MAHARRY, Trustees of the  
6 Maharry Henderson Family Trust; PATRICK TUMAMAIT; PAUL and ALDINE HENNIGAN,  
7 individually; PAUL and JANET BAILEY, individually; PAUL and JUNE CLEM, individually;  
8 PAUL and KIM ROBIE, individually; PAUL and MAELYN EBERT, individually; PAUL and  
9 SALLY CENTENO, individually; PAUL FONTEYN, individually; PAUL HOLAHAN and  
10 JULIE GRIST, individually; PAUL LEPIANE and BO BENGTSON, individually; PAULA  
11 BROWN, Trustee of the Paula Jean Brown Trust; PAULA LASITER; PAULA MCCULLOUGH,  
12 Trustee of the Paula J. McCullough Living Trust; PAULINE MERCADO, Trustee of the Pauline  
13 Mercado Revocable Trust; PEDRO CISNEROS; PEDRO TEPESANO; PER and INGE  
14 CHRISTIANSEN, individually; PERRY FAMILY, LLC; PETER and LINDA DAPRIX,  
15 individually; PETER and NORMA DWORKIS, individually; PETER DUFAU; PETER  
16 PASSELL; PETER STRAUSS and RACHEL TICOTIN, individually; PETROCHEM  
17 DEVELOPMENT I, LLC; PHILIP and DARYLYN LONG, individually; PHILIP and MARY  
18 PIERPONT, individually; PHILIP and ROBERT PIERPONT, individually; PHILIPPE and  
19 BETSY CALAND, Trustees of the Philippe M. and Betsy C. Trust; PREPARATORY  
20 VILLANOVA; QUINT MORRIS; RACHEL KONDOR and BRIAN SEGEE, individually;  
21 RAFAEL and MAGDALENA VILLALPANDO, individually; RAFFI J. MESROBIAN and  
22 MYRNA R. MESROBIAN, individually as Trustees of the Mesrobian Family Trust; RAINER  
23 BUSCHMANN and JOHN JOHNSTON, individually; RALPH and LYNNE LUNDY,  
24 individually; RAMAA MOSLEY; RANDAL R. O'CONNOR, SUCCESSOR Trustee of the Red  
25 Clay Trust, and successor Trustee of the Le Cedre Trust; RANJIT SEVAPRAKASAM; RAY  
26 HALL, Trustee-in-Trust of the 30 Acre Trust; RAYMOND and ESTHER KARDLY,  
27 individually; RAYMOND and EVA LYONS, individually; RAYMOND MAGEE and LINDA  
28 TAYLOR, individually; RDK LAND, LLC; REBECCA ADAMS; RED MOUNTAIN LAND

1 and FARMING, LLC; REEVES ORCHARD, LLC; REFUGIO GOMEZ; REX and HEIDI  
2 LANNING, individually; REYNOLDS FLEMING; RICARDO GONZALEZ; RICHARD and  
3 BILLIE SUMNER, individually; RICHARD and EMILY CARGILL, individually; RICHARD  
4 and KATHERINE GODFREY, individually; RICHARD and LEE HARPER, individually;  
5 RICHARD and MARILYN KALLAS;, individually RICHARD and NANCY FRANCIS,  
6 individually; RICHARD and TERESA TURNER, individually; RICHARD DODSON, Trustee of  
7 the Richard E. Dodson 2010 Revocable Trust; RICHARD FRANCIS; RICHARD FREY and  
8 WENDY APPLEBY, individually; RICHARD and EMMA KLINE, individually; RICHARD  
9 LOWEN; RICHARD MAGANA; RICHARD MCGRATH, Trustee of the Richard K McGrath  
10 Living Trust; RICHARD SOJKA; RJPR LTD. PARTNERSHIP; ROBERT and ANAMARIA  
11 SCHMID, individually; ROBERT and ANTOINETTE TIVY, individually; ROBERT and  
12 DIANA PETROPULOS, individually; ROBERT and DIANNE STONE, individually; ROBERT  
13 and DOMINQUE DANIELS, individually; ROBERT and DORA BALITZER, individually;  
14 ROBERT and EMILY MARTIN, individually; ROBERT and GAEA CANNADAY,  
15 individually; ROBERT and GERALDINE HUNSAKER, individually; ROBERT and  
16 JACQUELINE MCDANIEL, individually; ROBERT and JANICE HASTIE, individually;  
17 ROBERT and MARILYN SALAS, individually; ROBERT and MAUREEN YOUNG,  
18 individually; ROBERT and SHEILA GHEN, individually; ROBERT and SONIA RODARTE,  
19 individually; ROBERT and TAUNDRA RODDICK, individually; ROBERT and ANNA J.  
20 AURIC, individually as Trustees of the Auric Anna J. Family Trust; ROBERT CALDER DAVIS,  
21 JR., Trustee of the Robert Davis Surviving Spouse's Trust, Trustee of the Davis Family Bypass  
22 Trust and Trustee of the Davis Family Trust; ROBERT DEKKERS; ROBERT ERICKSON and  
23 RONALD WILSON, individually; ROBERT GRASMERE; ROBERT POLIDORI and  
24 BRITTANY SANDERS, individually; ROBERTO and MARIA ALONSO, individually;  
25 ROCKY MANN; RODERICK and JOYCE GREENE, individually; ROGER and SUSAN  
26 DICKENS, individually; ROGER BURKE; ROGER HALEY; Trustee of the Roger and Christina  
27 Haley Survivors Trust; ROGER WALKER; ROGERS-COOPER MEMORIAL FOUNDATION;  
28 RONALD and BETTE BLUHM, individually; RONALD and JULIA BRUNS, individually;



1 RONALD BLOOD and LINDA JORDAN, individually; RONALD E. NOVAK and LINDA L.  
2 LEWIS, individually as Trustees of the Novak Family Trust; RONALD K. FREELAND and  
3 DOREEN FREELAND, individually as Trustees or their successors in interest of the Freeland  
4 Trust and any amendment; RONALD L.R. HILL and DEBI R. HILL, Trustees of the R&D Hill  
5 Family Trust; RONALD VOGT; ROSEMARIE SINGER; ROSEMARY PAYNE, Trustee of the  
6 Rosemary Payne Trust; ROSS ANDERSON; ROWLAND A. HILL II and BRENDA M. HILL,  
7 individually as Trustees of the Trust dated November 1, 2002; ROY HICKS, Trustee of the Roy  
8 and Jacquelyn Hicks Family Trust; RUBEN and MARISA MARTINEZ, individually; RUBEN  
9 CHAVEZ; RUBEN MAGANA and JANETTE LUPERCIO, individually; RUDY BAEZ;  
10 RUSSEL and LAURA ALFORD, individually; RUSSELL and GOLDEN WILEY, individually;  
11 RUSSELL WALDROP, Trustee of the Russell B. Waldrop Living Trust; RYAN and LAUREN  
12 NICHOLS, individually; SABINO and NICKI PEREZ, individually; SABRINA VENSUS,  
13 Trustee of the Sabrina Venskus Living Trust; SALLY CRAIN; SALVATORE SCARPATO;  
14 SAMUEL and JOANNA SCHINDEL, individually; SAMUEL EATON; SANTA ANA RANCH,  
15 INC.; SARAH YOUNG; SAUNIE KREWSON; SCOTT and BRITTANY DENTON,  
16 individually; SCOTT and CAROL RASMUSSEN, individually; SCOTT and KEELA ALLISON,  
17 individually; SCOTT and MARIA HERTZOG, individually; SCOTT and MICHELE SUPAN;  
18 SCOTT CHASSE, Trustee of the Scott Chasse Revocable Living Trust; SCOTT FORSYTH and  
19 JOY FEDELE, individually; SCOTT LUNDY, Trustee of the Scott Lundy Trust; SCOTT  
20 LUTTENBERGER and NATASHA WILCOX, individually; SCOTTIE MONICAL; SEAN and  
21 LESLIE BENNETT, individually; SERAFIN and MARTHA FLORES, individually; SEVAN  
22 GERARD; SHAHRAM SHAHROKHFAR and DINA NAVA, individually; SHANKS  
23 INVESTMENT GROUP, LLC; SHAWN FULBRIGHT, Trustee of the Shawn Fulbright 2014  
24 Revocable Trust; SHAWN REED; SHELL OIL CO.; SHERRICE and JOHN WEECES,  
25 individually; SHERRIE DAILY; SHERYL SHUSHAN; SHIPPEE, LLC; SHULL BONSALL,  
26 JR., Trustee of the SHULL BONSALL FAMILY Trust; EVANGELINE BONSALL SMITH, a  
27 married woman; SIDNEY and JAYNE RICE, individually; STEVEN P. SMITH and LYNN  
28 DAVIS-SMITH, individually as Trustees of the Smith Revocable Living Trust; SOUTHERN

1 CALIFORNIA EDISON CO.; SOUTHERN CALIFORNIA ASSOCIATED INVESTORS, LTD.;  
2 SPENCER and BAILEY HILL, individually; SRPS, LP; STACY CADENASSO; STANLEY and  
3 THERESA WYATT, individually; STANLEY and W HUBBELL, individually; STATE OF  
4 CALIFORNIA, DEPARTMENT OF TRANSPORTATION; STEFAN KOZAK and ANA  
5 LOPES, individually; STEPHANIE and CHERYL BEAS, individually; STEPHEN MATZKIN,  
6 Trustee of the Stephen Matzkin Trust; STEPHEN TURNER, Trustee of the Stephen R. Turner  
7 Living Trust; STEVEN and BRENT KANALY, individually; STEVEN and CHRISTINE  
8 VAUGHAN, individually; STEVEN and KA RAPHOLZ, individually; STEVEN and KAREN  
9 ERICKSON, individually; STEVEN and KRISSELL DUTTER, individually; STEVEN ELLIOT  
10 EDELSON, Trustee of the Los Angeles Entertainment Trust; SUMEET BHATIA and MICHAEL  
11 MCDONALD, individually; SUMPURAN KHALSA, Trustee of the Sumpuran S. Khalsa Living  
12 Trust; SURIA and JOHN GOTTESMAN, individually; SUSAN BEE, Trustee of the John and  
13 Susan Bee Family Trust; SUSAN CONLEY, Trustee of the William and Susan Conley Family  
14 Trust; SUSAN DILLER, Trustee of the Susan J Diller Trust; SUSAN GARAND; SUSAN  
15 GRUBER, individually and as Trustee of the Susan Gruber Living Trust; SUSAN MCCORD-  
16 NEUFELD; SUSAN MOLL; SUSAN WEBSTER; SUZANNE HARVEY, individually and as  
17 Trustee of the Suzanne G. Harvey Revocable Trust; T BONE HOLDINGS, LLC; TANYA  
18 SMITH and MICHAEL MONTANO, individually; TANYA STARCEVICH; TED ROBINSON,  
19 Trustee of the Robinson Family Trust; TELOS DEVELOPMENT OJAI, LLC; TERRY  
20 WILSON, Trustee of the Terry Coultas Wilson Living Trust; THE OJAI RENTAL, LLC; THE  
21 ROMAN CATHOLIC ARCHBISHOP OF LOS ANGELES, a sole corporation; THEODOR and  
22 LORE EXNER, individually; THERESA STARK; THOMAS and CYNTHIA CARVER,  
23 individually; THOMAS and NANETTE BENBROOK, individually; THOMAS and JADONA  
24 COLLER HARPER, individually; THOMAS JACKSON; THOMAS TAMPLIN and  
25 MICHELLE WELLS, individually; THOMAS WALBRIDGE, Trustee of the Thomas C  
26 Walbridge Trust; THREE OAKS, LLC; THREE SISTERS ORCHARD, LP; TIMOTHY and  
27 CHERYL AUSTIN, individually; TIMOTHY and KATHLEEN MCHUGH, individually;  
28 TIMOTHY and KATHRYN MORAN, individually; TIMOTHY and LINDA TURNER,

1 individually; TIMOTHY and MARY WILLIAMSON, individually; TIMOTHY JONES; TODD  
2 and CHRISTINA MCGINLEY, individually; TODD RYAN and JESSICA CLICK, individually;  
3 TODD TULLETT, Trustee of the Todd Tullett Revocable Living Trust; TOM and NANCY  
4 ROLAND, individually; TONY and HEATHER CARLOS, individually; TRACEY and  
5 MELANIE BOULTON, individually; TRENT and KRIS GRECO, individually; TYLER and  
6 MARIA BARRELL, individually; TYLER LABINE and CARRIE RUSCHEINSKY,  
7 individually; ULDINE and FABIEN CASTEL, individually; URIEL and CHIEKO LOPEZ,  
8 individually; US NATURAL RESOURCES, INC.; VALLEY OAK CHARTER; VANLAW  
9 INVESTMENT CORP.; VENTURA LAND Trust; VENTURA UNIFIED SCHOOL DISTRICT;  
10 VICENTE GUZMAN; VICKI DAW; VICKI L. HOLLINGSWORTH, Trustee of the  
11 Hollingsworth Trust; VIRGINIA M. MCCARTHY, Trustee of the Virginia M. McCarthy Living  
12 Trust; VIRGINIA SIEGFRIED, Trustee of the Virginia A. Siegfried Revocable Trust; VIVIAN  
13 ARBER; VIVIENNE MOODY; WALTER and EVELYN GOLIS, individually; WALTER and  
14 LINDA BOYSIEWICK, individually; WALTER MCGOWAN, individually and as Trustee of the  
15 Walter Robert McGowan 1995 Trust; WANDA and MENIFORD CANTERBERRY,  
16 individually; WATERMARK CARP II LLC; WAYNE TATE and JANICE PRIEBE-TATE,  
17 individually as Trustees of the Tate Trust, as community property; WEISS INVESTMENT  
18 PROPERTIES; WENDY and DAVID CHURCHILL, individually; WERNER and ELVA  
19 FISCHER, individually; WESLEY SCOTT and KASEY PERINS, individually; WEST CRAG  
20 GLEN SMITH, successor Trustee of the Melissa Irene Elizabeth Smith Irrevocable Special Needs  
21 Trust - 1993; WILLI and STEFANIE U. COELER, individually and as Trustees of the W. and S.  
22 Coeler Living Trust; WILLIAM and CYNTHIA ANDERSON, individually; WILLIAM and  
23 JACQUELINE BOCH, individually; WILLIAM and LORRAINE WALSH, individually;  
24 WILLIAM and MELINDA WELCH, individually; WILLIAM and SUSAN LUTHER,  
25 individually; WILLIAM B. HART, JR., Trustee of the Constance Eaton Personal Residence  
26 Trust; WILLIAM BAILEY, Trustee of the William F. Bailey Living Trust; WILLIAM  
27 BROTHERS, Trustee of the William C. Brothers Living Trust; WILLIAM ERICKSON;  
28 WILLIAM F. NEWTON and CHARLOTTE R. NEWTON, individually as Trustees of the

1 NEWTON FAMILY Trust; WILLIAM GILBRETH, Trustee of the William J. Gilbreth Trust;  
2 WILLIAM HAWKSWORTH; WILLIAM LOWES; WILLIAM L. REYNOLDS; WILLIAM  
3 WHITE, Trustee of the William C. White Trust; WILLIAM WHORF; WILMETTA DAVIS;  
4 WINFRIED and CAROL BOERSCH, individually; WYNN JOHNSON and LISA AYALA  
5 JOHNSON, individually; YAN and ALILI COMMENT, individually; YARROW and  
6 CAROLINE CHENEY, individually; YITZHAK and SMADAR ORLANS, individually; YVON  
7 and MALINDA CHOUINARD, individually; ZOBEIDA OLSON [collectively “Riparian and  
8 Overlying Landowners”];

9  
10 ALL PERSONS WHO OWN AN INTEREST IN LAND ADJACENT TO THE VENTURA  
11 RIVER OR ITS TRIBUTARIES OR IN LAND OVERLYING THE VENTURA RIVER  
12 WATERSHED’S GROUNDWATER BASINS AND CLAIM AN INTEREST TO DIVERT,  
13 PUMP, EXTRACT OR STORE GROUNDWATER FROM, UNDER OR ON THAT LAND  
14 [collectively “Interested Persons”]

15  
16 and ROES 1-1,000,  
17 collectively, Cross-Defendants.

1 THIRD AMENDED CROSS-COMPLAINT

2  
3 Cross-Complainant City of San Buenaventura (“City”) alleges as follows:

4  
5 INTRODUCTION

6  
7 1. This Cross-Complaint seeks a judicial determination of rights to all water within  
8 the Ventura River Watershed (“Watershed”), including a comprehensive adjudication of the  
9 waters of the Ventura River and the groundwater basins located within the Watershed and their  
10 interconnected surface waters and for the imposition of a physical solution. An adjudication is  
11 necessary to protect and conserve the limited water supply that is vital to the public health, safety,  
12 and welfare of all persons and entities that depend upon waters from the Watershed and to ensure  
13 the reasonable use, pursuant to Article X, section 2 of the California Constitution, of the waters in  
14 the Watershed. For these reasons, City files this Cross-Complaint to promote the general public  
15 welfare in the Watershed; protect City’s rights to pump and divert water and provide water to the  
16 public; protect from a loss of the public’s water supply; prevent degradation of the quality of the  
17 public water supply; and avoid higher water costs to the public.

18  
19 PARTIES

20  
21 2. City is a charter city and municipal corporation of the State of California and  
22 located in the County of Ventura (“Ventura County”). The City operates wells and diversions  
23 which extract surface and/or subsurface water from the Ventura River and receives water  
24 deliveries from Lake Casitas.

25 Original Cross-Defendants

26 3. Cross-Defendant Duncan Abbott (“Abbott”) is an individual. City is informed and  
27 believes that Abbott operates wells and/or diversions which extract surface and/or subsurface  
28 water from Coyote Creek.

1           4.       Cross-Defendant AGR Breeding, Inc. ("AGR") is a California corporation  
2 organized and existing under the laws of the State of Colorado and doing business in Ventura  
3 County. City is informed and believes that AGR operates wells and/or diversions which extract  
4 surface and/or subsurface water from San Antonio Creek.

5           5.       Cross-Defendant Asquith Family Limited Partnership, Ltd. ("Asquith Family") is  
6 a California Corporation organized and existing under the laws of the State of California and  
7 doing business in Ventura County. City is informed and believes that Asquith Family operates  
8 well(s) which extract water from the Ojai Valley Groundwater Basin.

9           6.       Cross-Defendant Troy Becker ("Becker") is an individual. City is informed and  
10 believes that Becker operates well(s) which extract water from the Ojai Valley Groundwater  
11 Basin.

12           7.       Cross-Defendant Bentley Family Limited Partnership ("Bentley") is a California  
13 corporation registered in Delaware and does business in Ventura County. City is informed and  
14 believes that Bentley operates well(s) which extract water from the Ojai Valley Groundwater  
15 Basin.

16           8.       Cross-Defendant Robin Bernhof ("Bernhof") is an individual. City is informed  
17 and believes that Bernhof operates well(s) which extract water from the Ojai Valley  
18 Groundwater Basin.

19           9.       Cross-Defendant Dwayne Boccali ("Boccali") is an individual. City is informed  
20 and believes that Bernhof operates well(s) which extract water from the Ojai Valley  
21 Groundwater Basin.

22           10.      Cross-Defendant Janet Boulton ("J. Boulton") is an individual. City is informed  
23 and believes that J. Boulton operates well(s) which extract water from the Ojai Valley  
24 Groundwater Basin.

25           11.      Cross-Defendant Michael Boulton ("M. Boulton") is an individual. City is  
26 informed and believes that M. Boulton operates well(s) which extract water from the Ojai Valley  
27 Groundwater Basin.  
28

12. Cross-Defendant Dwayne Bower (“Bower”) is an individual. City is informed and believes that Bower operates well(s) which extract water from the Ojai Valley Groundwater Basin.

13. Cross-Defendant Burgess Ranch (“Burgess”) is a California corporation organized and existing under the laws of the State of Colorado and doing business in Ventura County. City is informed and believes that Burgess operates well(s) which extract water from the Ojai Valley Groundwater Basin.

14. Cross-Defendant Michael Caldwell (“Caldwell”) is an individual. City is informed and believes that Caldwell operates wells and/or diversions which extract surface and/or subsurface water from the Upper Ventura River.

15. Cross-Defendant Casitas Municipal Water District (“Casitas”) is a California special district organized and existing under the laws of the State of California and located in Ventura County. City is informed and believes that Casitas obtains water from Lake Casitas which contains natural flows from Coyote and Santa Ana Creeks and Ventura River diversions transported to the lake via the 5.4-mile Robles Canal from the Robles Diversion and Fish Passage Facility. City is informed and believes that in 2017, Casitas acquired Golden State Water Company (“Golden State”), a California corporation previously organized and existing under the laws of the State of California and doing business in Ventura County. Golden State was a public utility regulated by the California Public Utilities Commission. City is informed and believes that Golden State operated and that Casitas now operates wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows from the Ojai Valley Groundwater Basin to a tributary of the Ventura River.

16. Cross-Defendant Casitas Mutual Water Company (“CMWC”) is a California corporation organized and existing under the laws of the State of California and doing business as a mutual water company in Ventura County. City is informed and believes that CMWC operates wells that extract water from the Upper Ventura River Groundwater Basin, affecting outflows from that basin to Watershed.



1           17.     Cross-Defendant Charles Cho (“Cho”) is an individual. City is informed and  
2 believes that Cho operates well(s) which extract water from the Ojai Valley Groundwater Basin.

3           18.     Cross-Defendant Joe Clark (“J. Clark”) is an individual. City is informed and  
4 believes that J. Clark operates well(s) which extract water from the Ojai Valley Groundwater  
5 Basin.

6           19.     Cross-Defendant Kevin Clark (“K. Clark”) is an individual. City is informed and  
7 believes that K. Clark operates well(s) which extract water from the Ojai Valley Groundwater  
8 Basin.

9           20.     Cross-Defendant Lisa Clark (“L. Clark”) is an individual. City is informed and  
10 believes that L. Clark operates well(s) which extract water from the Ojai Valley Groundwater  
11 Basin.

12           21.     Cross-Defendant Rebecca Collins (“R. Collins”) is an individual. City is informed  
13 and believes that R. Collins operates well(s) which extract water from the Ojai Valley  
14 Groundwater Basin.

15           22.     Cross-Defendant Thomas Collins (“T. Collins”) is an individual. City is informed  
16 and believes that T. Collins operates well(s) which extract water from the Ojai Valley  
17 Groundwater Basin.

18           23.     Cross-Defendant Michael Cromer (“Cromer”) is an individual. City is informed  
19 and believes that Cromer operates wells and/or diversions which extract surface and/or subsurface  
20 water from San Antonio Creek.

21           24.     Cross-Defendant Robert C. Davis, Jr. (“Davis”) is an individual. City is informed  
22 and believes that Davis operates well(s) which extract water from the Ojai Valley Groundwater  
23 Basin.

24           25.     Cross-Defendant Linda Epstein (“Epstein”) is an individual. City is informed and  
25 believes that Epstein operates well(s) which extract water from the Ojai Valley Groundwater  
26 Basin.

27           26.     Cross-Defendant Essick Farm Management Company, LLC (“Essick”) is a  
28 California corporation organized and existing under the laws of the State of California and doing

1 business in Ventura County. City is informed and believes that Essick operates well(s) which  
2 extract water from the Ojai Valley Groundwater Basin.

3 27. Cross-Defendant Etchart Ranch ("Etchart") is located in Ventura County. City is  
4 informed and believes that Etchart operates wells and/or diversions which extract surface and/or  
5 subsurface water from the Upper Ventura River.

6 28. Cross-Defendant James Finch ("Finch") is an individual. City is informed and  
7 believes that Finch operates wells and/or diversions which extract surface and/or subsurface water  
8 from the Lower Ventura River.

9 29. Cross-Defendant Flying H Ranch, Inc. ("Flying") is a California corporation  
10 organized and existing under the laws of the State of California and doing business in Ventura  
11 County. City is informed and believes that Flying operates wells and/or diversions which extract  
12 surface and/or subsurface water from San Antonio Creek.

13 30. Cross-Defendant Ernest Ford ("Ford") is an individual. City is informed and  
14 believes that Ford operates wells and/or diversions which extract surface and/or subsurface water  
15 from the Upper Ventura River.

16 31. Cross-Defendant Wayne Francis ("Francis") is an individual. City is informed and  
17 believes that Francis operates well(s) which extract water from the Ojai Valley Groundwater  
18 Basin.

19 32. Cross-Defendant Friend's Ranches, Inc. ("Friend's") is a California corporation  
20 organized and existing under the laws of the State of California and doing business in Ventura  
21 County. City is informed and believes that Friend's operates wells and/or diversions which  
22 extract surface and/or subsurface water from San Antonio Creek and the Upper Ventura River.

23 33. Cross-Defendant John Galaska ("Galaska") is an individual. City is informed and  
24 believes that Galaska operates well(s) which extract water from the Ojai Valley Groundwater  
25 Basin.

26 34. Cross-Defendant Richard Gilleland ("Gilleland") is an individual. City is  
27 informed and believes that Gilleland operates wells and/or diversions which extract surface  
28 and/or subsurface water from San Antonio Creek.

1           35.     Cross-Defendant Jurgen Gramckow (“Gramckow”) is an individual. City is  
2 informed and believes that Gramckow operates wells and/or diversions which extract surface  
3 and/or subsurface water from Coyote Creek.

4           36.     Cross-Defendant Gridley Road Water Group (“Gridley”) is a California  
5 corporation organized and existing under the laws of the State of California and doing business as  
6 a mutual water company in Ventura County. City is informed and believes that Gridley operates  
7 wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows from that  
8 basin to Watershed.

9           37.     Cross-Defendant Stephanie Gustafson (“Gustafson”) is an individual. City is  
10 informed and believes that Gustafson operates well(s) which extract water from the Ojai Valley  
11 Groundwater Basin.

12           38.     Cross-Defendant Lawrence Hartmann (“Hartmann”) is an individual. City is  
13 informed and believes that Hartmann operates well(s) which extract water from the Ojai Valley  
14 Groundwater Basin.

15           39.     Cross-Defendant Hermitage Mutual Water Company (“Hermitage”) is a California  
16 corporation organized and existing under the laws of the State of California and doing business as  
17 a mutual water company in Ventura County. City is informed and believes that Hermitage  
18 operates wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows  
19 from that basin to Watershed.

20           40.     Cross-Defendant Dorothy Holmes (“Holmes”) is an individual. City is informed  
21 and believes that Holmes operates wells and/or diversions which extract surface and/or  
22 subsurface water from North Fork Matilija Creek.

23           41.     Cross-Defendant Stephen Huyler (“Huyler”) is an individual. City is informed and  
24 believes that Huyler operates well(s) which extract water from the Ojai Valley Groundwater  
25 Basin.

26           ~~42.~~     Cross-Defendants Jurgen Gramckow and Geraldine Gramckow are Trustees of the  
27 J&G Trust (“Gramckows”). City is informed and believes that Gramckows operate wells and/or  
28 diversions which extract surface and/or subsurface water from the Upper Ventura River

1 Groundwater Basin. City is informed and believes that Gramckows are owners of or are  
2 beneficial interest holders in real property located within the Ventura River Watershed, and they  
3 claim riparian rights to divert and/or extract surface and/or subsurface water from the Ventura  
4 River and/or its tributaries, whether or not they have exercised such riparian rights.

5 43. Cross-Defendant Cheryl Jensen (“Jensen”) is an individual. City is informed and  
6 believes that Jensen operates well(s) which extract water from the Ojai Valley Groundwater  
7 Basin.

8 44. Cross-Defendant Brett Kantrowitz (“B. Kantrowitz”) is an individual. City is  
9 informed and believes that B. Kantrowitz operates well(s) which extract water from the Ojai  
10 Valley Groundwater Basin.

11 45. Cross-Defendant Denise Kantrowitz (“D. Kantrowitz”) is an individual. City is  
12 informed and believes that D. Kantrowitz operates well(s) which extract water from the Ojai  
13 Valley Groundwater Basin.

14 46. Cross-Defendant Jerry Kenton (“Kenton”) is an individual. City is informed and  
15 believes that Kenton operates wells and/or diversions which extract surface and/or subsurface  
16 water from North Fork Matilija Creek.

17 47. Cross-Defendant Ole Konig (“Konig”) is an individual. City is informed and  
18 believes that Konig operates wells and/or diversions which extract surface and/or subsurface  
19 water from San Antonio Creek.

20 48. Cross-Defendant Krotona Institute of Theosophy (“Krotona”) is a 501(c)(3)  
21 California non-profit corporation located in Ventura County. City is informed and believes that  
22 Krotona claims water rights to surface water and/or groundwater in the Ventura River Watershed.

23 49. Cross-Defendant Tim Krout (“Krout”) is an individual. City is informed and  
24 believes that Krout operates well(s) which extract water from the Ojai Valley Groundwater Basin.

25 50. Cross-Defendant Betina La Plante (“La Plante”) is an individual. City is informed  
26 and believes that La Plante operates well(s) which extract water from the Ojai Valley  
27 Groundwater Basin.

1           51.     Cross-Defendant Lutheran Church of the Holy Cross of Ojai (“Lutheran Church”)  
2 is a California Non-profit Corporation. City is informed and believes that Lutheran Church  
3 operates wells and/or diversions which extract surface and/or subsurface water from San Antonio  
4 Creek.

5           52.     Cross-Defendant Scott Luttenberg (“Luttenberg”) is an individual. City is  
6 informed and believes that Luttenberg operates well(s) which extract water from the Ojai Valley  
7 Groundwater Basin.

8           53.     Cross-Defendant Jeffrey Luttrull (“Luttrull”) is an individual. City is informed  
9 and believes that Luttrull operates well(s) which extract water from the Ojai Valley Groundwater  
10 Basin.

11          54.     Cross-Defendant Meiners Oaks Water District (“Meiners Oaks”) is a California  
12 special district organized and existing under the laws of the State of California and located in  
13 Ventura County. City is informed and believes that Meiners Oaks operates wells that extract  
14 surface and/or subsurface water from the Ventura River and/or Watershed.

15          55.     Cross-Defendant Fredrick Menninger (“F. Menninger”) is an individual. City is  
16 informed and believes that F. Menninger operates well(s) which extract water from the Ojai  
17 Valley Groundwater Basin.

18          56.     Cross-Defendant Margaret Menninger (“M. Menninger”) is an individual. City is  
19 informed and believes that M. Menninger operates well(s) which extract water from the Ojai  
20 Valley Groundwater Basin.

21          57.     Cross-Defendant Stephen Mitchell (“Mitchell”) is an individual. City is informed  
22 and believes that Mitchell operates well(s) which extract water from the Ojai Valley Groundwater  
23 Basin.

24          58.     Cross-Defendant Bill Moses (“Moses”) is an individual. City is informed and  
25 believes that Moses operates well(s) which extract water from the Ojai Valley Groundwater  
26 Basin.

27          59.     Cross-Defendant North Fork Springs Mutual Water Company (“North Fork  
28 Springs”) is a California corporation organized and existing under the laws of the State of

1 California and doing business as a mutual water company in Ventura County. City is informed  
2 and believes that North Fork Springs operates wells that extract water from the Upper Ventura  
3 River Groundwater Basin, affecting outflows from that basin to Watershed.

4 60. Cross-Defendant Ojai Water Conservation District (“Ojai WCD”) is a California  
5 special district organized and existing under the laws of the State of California and located in  
6 Ventura County. City is informed and believes that Ojai WCD operates wells and/or diversions  
7 which extract surface and/or subsurface water from San Antonio Creek.

8 61. Cross-Defendant Old Creek Road Mutual Water Company (“Old Creek Road”) is  
9 a California corporation organized and existing under the laws of the State of California and  
10 doing business as a mutual water company in Ventura County. City is informed and believes that  
11 Old Creek Road obtains water from Casitas, which obtains water from Lake Casitas which  
12 contains water diverted from the Ventura River.

13 62. Cross-Defendant Rancho de Cielo Mutual Water Company (“Rancho de Cielo”) is  
14 a California corporation organized and existing under the laws of the State of California and  
15 doing business as a mutual water company in Ventura County. City is informed and believes that  
16 Rancho de Cielo obtains water from Casitas, which obtains water from Lake Casitas which  
17 contains water diverted from the Ventura River.

18 63. Cross-Defendant Rancho Matilija Mutual Water Company (“Rancho Matilija”) is  
19 a California corporation organized and existing under the laws of the State of California and  
20 doing business as a mutual water company in Ventura County. City is informed and believes that  
21 Rancho Matilija operates wells that extract surface and/or subsurface water from the Ventura  
22 River and/or Watershed.

23 64. Cross-Defendant Shlomo Raz is an individual. City is informed and believes that  
24 Shlomo Raz operates well(s) which extract water from the Ojai Valley Groundwater Basin.

25 65. Cross-Defendant Sylvia Raz is an individual. City is informed and believes that  
26 Sylvia Raz operates well(s) which extract water from the Ojai Valley Groundwater Basin.

27 66. Cross-Defendant Rincon Water and Road Works (“Rincon”) is a California  
28 corporation organized and existing under the laws of the State of California and doing business in

Ventura County. City is informed and believes that Rincon claims water rights to surface water and/or groundwater in the Ventura River Watershed.

67. Cross-Defendant Charles Rudd (“Rudd”) is an individual. City is informed and believes that Rudd operates wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

68. Cross-Defendant William Rusin (“Rusin”) is an individual. City is informed and believes that Rusin operates wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

69. Defendant Mark Saleh (“Saleh”) is an individual. City is informed and believes that Saleh operates well(s) which extract water from the Ojai Valley Groundwater Basin.

70. Cross-Defendant Senior Canyon Mutual Water Company (“Senior Canyon”) is a California corporation organized and existing under the laws of the State of California and doing business as a mutual water company in Ventura County. City is informed and believes that Senior Canyon operates wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows from the Ojai Valley Groundwater Basin to a tributary of the Ventura River.

71. Cross-Defendant Siete Robles Mutual Water Company (“Siete Robles”) is a California corporation organized and existing under the laws of the State of California and doing business as a mutual water company in Ventura County. City is informed and believes that Siete Robles operates wells that extract water from the Ojai Valley Groundwater Basin, affecting outflows from that basin to Watershed.

72. Cross-Defendant Sisar Mutual Water Company (“Sisar”) is a California corporation organized and existing under the laws of the State of California and doing business as a mutual water company in Ventura County. City is informed and believes that Sisar operates wells that extract water from the Upper Ojai Valley Groundwater Basin, affecting outflows from that basin to Watershed.

73. Cross-Defendant Soule Park Golf Course, Ltd. (“Soule Park”) is a California corporation organized and existing under the laws of the State of California and doing business in



Ventura County. City is informed and believes that Soule Park operates well(s) which extract water from the Ojai Valley Groundwater Basin.

74. Cross-Defendant St Joseph's Associates of Ojai, California, Inc. ("St. Joseph's") is a California corporation organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that St. Joseph's operates wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

75. Cross-Defendant Andrew Stasse ("Stasse") is an individual. City is informed and believes that Stasse operates well(s) which extract water from the Ojai Valley Groundwater Basin.

76. Cross-Defendant George S. Stuart ("Stuart") is an individual. City is informed and believes that Stuart operates well(s) which extract water from the Ojai Valley Groundwater Basin.

77. Cross-Defendant John Taft ("Taft") is an individual. City is informed and believes that Taft operates wells and/or diversions which extract surface and/or subsurface water from Coyote Creek.

78. Cross-Defendant Telos, LLC ("Telos") is a California Corporation organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that Telos operates well(s) which extract water from the Ojai Valley Groundwater Basin.

79. Cross-Defendant Thacher Creek Citrus, LLC ("Thacher Creek") is a California corporation organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that Thacher Creek operates wells and/or diversions which extract surface and/or subsurface water from San Antonio Creek.

80. Cross-Defendant The Thacher School ("Thacher School") is a California non-profit organization organized and existing under the laws of the State of California and doing business in Ventura County. City is informed and believes that Thacher School operates well(s) which extract water from the Ojai Valley Groundwater Basin.

81. Cross-Defendant Tico Mutual Water Company ("Tico") is a California corporation organized and existing under the laws of the State of California and doing business as a mutual

1 water company in Ventura County. City is informed and believes that Tico operates wells that  
2 extract water from the Upper Ventura River Groundwater Basin, affecting outflows from that  
3 basin to Watershed.

4 82. Cross-Defendant Victor Timar ("Timar") is an individual. City is informed and  
5 believes that Timar operates well(s) which extract water from the Ojai Valley Groundwater  
6 Basin.

7 83. Cross-Defendant Topa Topa Ranch Company, LLC ("Topa") is a California  
8 corporation organized and existing under the laws of the State of California and doing business in  
9 Ventura County. City is informed and believes that Topa operates wells and/or diversions which  
10 extract surface and/or subsurface water from San Antonio Creek.

11 84. Cross-Defendant Lou Tomesetta ("Tomesetta") is an individual. City is informed  
12 and believes that Tomesetta operates well(s) which extract water from the Ojai Valley  
13 Groundwater Basin.

14 85. Cross-Defendant John Town ("J. Town") is an individual. City is informed and  
15 believes that J. Town operates well(s) which extract water from the Ojai Valley Groundwater  
16 Basin.

17 86. Cross-Defendant Trudie Town ("T. Town") is an individual. City is informed and  
18 believes that T. Town operates well(s) which extract water from the Ojai Valley Groundwater  
19 Basin.

20 87. Cross-Defendant Ernesto Vega ("Vega") is an individual. City is informed and  
21 believes that Vega operates well(s) which extract water from the Ojai Valley Groundwater Basin.

22 88. Cross-Defendant Ventura County Watershed Protection District ("VCWPD") is a  
23 California special district organized and existing under the laws of the State of California and  
24 located in Ventura County. City is informed and believes that VCWPD operates wells and/or  
25 diversions which extract surface and/or subsurface water from San Antonio Creek.

26 89. Cross-Defendant the Ventura River Water District ("VRWD") is a California  
27 special district organized and existing under the laws of the State of California and located in  
28

Ventura County. City is informed and believes that VRWD operates wells that extract surface and/or subsurface water from the Ventura River and/or Watershed.

90. Cross-Defendant Wood-Claeyssens Foundation (“Foundation”) is a 501(c)(3) charitable foundation registered in Delaware that owns the Taylor Ranch property and does business in Ventura County. Foundation operates wells, extracts groundwater, and has operated a surface diversion that extracts surface and/or subsurface water from the Ventura River and/or Watershed.

91. Cross-Defendant Calvin Zara (“Zara”) is an individual. City is informed and believes that Zara operates wells and/or diversions which extract surface and/or subsurface water from Matilija Creek.

#### Riparian Landowners

92. City is informed and believes that the following Cross-Defendants (“Riparian Landowners”) are owners of or are beneficial interest holders in real property located within the Ventura River Watershed, and they claim riparian rights to divert and/or extract surface and/or subsurface water from the Ventura River and/or its tributaries, whether or not they have exercised such riparian rights:

1970 Ranch Road, LLC;  
625 N. Ventures Avenue, LLC;  
Abraham Munoz;  
Ahde and Ganea Lahti, individually;  
Alan and Carol James, individually;  
Alessandro Lobba and Mary E. Jackson,  
individually as Trustees of the Looba-  
Jackson Family Trust;  
Alexander and Maria Doran, individually;  
Alfredo and Montelle Bello, individually;  
Alvin and Claudia Cunningham,  
individually;  
American Retirement Fund, Inc.;  
Amy Mattison, Trustee of the Amy K.  
Mattison Trust;  
Anatoly and Margarita Kozushin,  
individually;  
Andrea Leigh Jensen, Trustee of the Jensen

Trust;  
Andrew and Jane Holguin, individually;  
Andrew D. West and Patricia G. West,  
individually as Trustees of the West Family  
Revocable Trust;  
Angie Mari Ganasei and Christopher Paul  
Danch, individually as Trustees of the  
Genasei-Danch Family Trust;  
Anne Lombard and Frank Hanson,  
individually;  
Armando and Sendi Sanchez, individually;  
Arthur Timothy and Maurya Kathleen Foy,  
individually;  
Ashlen and Ivy Aquila, individually;  
Aubrey Balkind;  
Auburn Oak Builders, Inc.;  
Barry and Angela Ross, individually;  
Behrooz Jadidollahi;  
Benjamin and Stacey Vail, individually;

<p>1 Berkley and Suzanne Baker, individually;  2 Bettina Chandler, Trustee of the Bettina  3 Chandler Trust;  4 Blanche Chapler;  5 Bradford and Cheryl Boyd, individually;  6 Brent and Shanna Muth, individually;  7 Brian and Irene McConville, individually;  8 Brian and Joan Archer, individually;  9 Brian and Sharon Smith, individually;  10 Brian S. Stafford and Janice M. Thomas,  11 individually as Trustees of the Stafford  12 Thomas Family Trust;  13 Brian Skaggs, Trustee of the Skaggs Trust;  14 Brigitte Lovell, Trustee of the Lovell Living  15 Trust;  16 Bruce Abbott and Kathleen Quinlan,  17 individually;  18 Bruce and Dixie Gladstone, individually;  19 Bryan Whitley;  20 Bryce and Krista Belgum, individually;  21 Carl and Barbara Enson, individually;  22 Carmen Chavez and Guadalupe Patino,  23 individually;  24 Carol Nicholson;  25 Carol Ann Tennant, Trustee of the Carol  26 McDonnell Family Trust;  27 Carrie Murphy and Michael E. Templin,  28 individually as Trustees of the Templin-  Murphy 2016 Living Trust;  Cartin Family, LLC;  Catherine E. Lee, Trustee of the Catherine E.  Lee Trust;  Chad Westcott and Heather Cushnie  Wescott, individually;  Charles E. Starbuck, Trustee of the Charles  E. Starbuck Trust;  Charles P. Watling, Trustee of the First  Charles P. Watling Family Trust;  Charline L. Rich and Richard Gibson Jr.,  individually;  Christopher and Tina Abe, individually;  Christopher Hart;  Christopher Moore and Mary Moore,  individually as Trustees of the Christopher  Moore and Mary Moore Trust;  Cindy Prose;  Clair and Stacey Harding, individually;  Claudia Zenobia Linarte, Trustee of the Olga</p>	<p>Trust;  Claudio and Magdalena Landeros,  individually;  Community Memorial Health System;  Connie S. Morgan, Trustee of the Connie S.  Morgan Trust;  Conservation Endowment Fund;  Constance and Justin Campbell,  individually;  Corinne Anne Fraud;  Craig and Ana Zwirn, individually;  Curtis and Ory Names, individually;  Cynthia Lee, Trustee of the Cynthia Lee  Family Trust;  D &amp; J Campbell Best, LLC;  Dan Newman;  Dan Stuart, Trustee of the Dana Stuart Trust;  Dan Wiseman;  Dana and Dawn Cenicerros, individually;  Daniel and Amy Yanez, individually;  Daniel and Nancy McLaren, individually;  Daniel and Rosalind Grimm, individually;  Danny Broadhurst;  Darren and Lisa Lisle, individually;  David Friend and Angela Marie Friend,  individually;  David and Linda Smith, individually;  David and Patti Wicklund, individually;  David Chase and Anne Fitzgerald,  individually;  David E. Sissum, Jr. and Diana E. Sissum,  individually as Trustees of the Sissum Trust;  David Flick and Emma Flick, individually;  Dawn and Mark Golden, individually;  DB Properties, LLC;  Del Cielo, LLC;  Dennis and Susan Ryder, individually;  Dennis Brown;  Dennis Wood and Margaret Vigil Wood,  individually;  Diane Ruth White, Trustee of the Diane  Ruth White Living Trust;  Dive Deep, LLC;  Donald and Wendy Givens, individually;  Donald Campbell;  Donna and James Kleeburg, individually;  Dorothy Holmes, Trustee of the Holmes  Trust;</p>
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<p>1 Dorothy Lanquist; 2 Douglas Freeman and Miranda 3 MargettGunild Seadrifts, individually; 4 DZ SPE, LLC; 5 Earl G. Holder, Trustee of the Holder 6 Survivors Trust; 7 Edward and Geraldine Lee, individually; 8 Edward C. Leicht and Jacqueline M. Leicht, 9 individually as Trustees of the Leicht Family 10 2013 Revocable Trust; 11 Eleanor Small; 12 Elena Dhyansky, Trustee of the Elena 13 Dhyansky Trust; 14 Elizabeth Keenen; 15 Elton Pedersen and Alma Clayton Pedersen, 16 individually; 17 Eric and Jodi Perdue, individually; 18 Eric and Ming Jun Nakamura, individually; 19 Eric and Trisha Johnson, individually; 20 Eric Lawrence Bernthal, Special Trustee of 21 the Boss and Venice Trust; 22 Eric Lewis and Bobbi Roderick Lewis, 23 individually; 24 Erik and Tirica Eads, individually; 25 Eugene and Charlotte Elerding, individually; 26 Evelyn Frament; 27 Fortune Builders, Inc.; 28 Frank Robert Walker Jr. and Carrie Ellen Walker, individually as Co-Trustees of the Walker Jr. Living Trust; Frederick and Lori Ponce, individually; Galen and Maria David, individually; Gary Hirschcron, Trustee of the Gary Hirschcron Revocable Trust; Gary L. Wolfe, Successor Trustee of the Carolyn M. Tastad Revocable Trust; Gary and Terri McCaskill, individually as Trustees of the McCaskill Family Trust; Gary Speeds and Lisa R. Kirby, individually as Trustees of the Gary Speeds and Lisa Kirby Family Trust; Gelb Enterprises; George and Pamela Zeller, individually; George and Roxanne Pelt, individually; George Hernandez; George Lawhead, Trustee of the George and Carole Lawhead Revocable Trust; Girl Scouts Of California's Central Coast;</p>	<p>Glenn and Lori Ahlberg, individually; Gordon and Patricia Black, individually; Gralar, LLC; Graydon and Helen Harrah, Individually; Gregory and Michele Hammed, individually; Gregory Cavette; Gregory Grant and Mary King, individually; Hans and Annika Gruenn, individually; Hendrika Maria Von Hecht; Henry and Geneva Oliva, individually; Henry and Leslie Sohm, individually; Howard and Irene Hoos, individually; Hugh and Lindsay Thomson, individually; Intell Ventura, LLC; Irma Tracy; Jackie M. Springer, Trustee to the Jackie M. and Lanie Jo Springer Trust; James and Andrea Pendleton, individually; James and Gayle David, individually; James and Staci Valencia, individually; James and Sue Mills, individually; James and Trisha Proud, individually; James and Zelda Carr, individually; James Peck; James I. Pio, Trustee of the James I. Pio Trust; Jan M. Hiester, Trustee of the Jan M. Hiester 2014 Living Trust; Jane E. Hanchett, Trustee of the Hanchett Family Trust; Jane Spiller, Trustee of the Jane Spiller Trust; Janet Lewis, Trustee of the Janet T. Lewis Family Trust; Janet Peck, Trustee of the Janet Lee Peck Living Trust; Jeannette Curtis; Jeffrey E. Frank, Trustee of The Frank Trust; Jeffrey Tubbs and Lynn Dubowy Duran, individually; Jennie Scott, Trustee of the Jennie Scott Family Trust; Jennifer Ware and Jamie Selby, individually; Jeremy August and Icole Marie Ferro, Individually; Jesse Wadsworth and Susan Hynds, individually; Jesus Cornejo and Idania Yudith Cornejo,</p>
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1 individually;  
2 Joan Kenton, Trustee of The Joan Kenton  
3 Living Trust;  
4 Joanna Pope;  
5 Jody Callegari;  
6 Joel Hernandez;  
7 Johanna Collins;  
8 John and Lisa Dillard, individually;  
9 John and Mari Allen, individually;  
10 John and Nancy Bevans, individually;  
11 John and Nila Ventress, individually;  
12 John Edward and Evonne Louise Vacca,  
13 individually;  
14 John Gutierrez;  
15 John Mazzola and April Golden,  
16 individually;  
17 John Taft Corporation;  
18 Jon Hanson;  
19 Jonathan and Jacqueline Parker,  
20 individually;  
21 Jonathan and Julie Teichert, individually;  
22 Jose Juarez and Ana Valencia, individually;  
23 Jose Valadez and Norma Hernandez,  
24 individually;  
25 Joseph Palmoutsos as Trustee of the Joseph  
26 Constantinos Palmoutsos Living Trust;  
27 Joseph Polito, Trustee of the Joseph R Polito  
28 1989 Trust;  
Joshua Antelman;  
Joyce Frenette;  
Juan Espinoza and Travis Coker,  
individually;  
Juana and Henry Murillo; individually;  
June M. Spar, Trustee of the June M. Spar  
Living Trust;  
Jurgen Gramckow and Geraldine  
Gramckow, individually as Trustees of the  
J&G Trust;  
Justin and Rachael Jayne, individually;  
Karen Mendoza, Trustee of the Vork Family  
Trust;  
Katherine Patton and Virginia McConnell,  
individually;  
Kathleen Turner and Elizabeth Renn,  
individually;  
Kay Burns;  
Ken Collin;  
Kenneth and Maria Baker, individually;

Kenneth S. Collins, Trustee of the Frank R.  
Walker, Jr. Trust;  
Kent and Patricia Hardley, individually;  
Kevin K. Cox and Mary C. Cox, individually  
as Trustees of the Cox Family Trust;  
Kim Jirka, Trustee of the Kim Jirka Trust;  
Konstantin Demidov;  
Kyle Brown;  
Lance and Donelle Woleslagle, individually;  
Larry and Cecilia Hickok, individually;  
Larry Hubenthal, individually and as Trustee  
of the Larry Hubenthal Living Trust;  
Laszlo and Sharon Bihari, individually;  
Laszlo Engelman, Trustee of the Engelman  
Family Trust  
Laughing Dog Ranch, LLC;  
Laverne M. Browning;  
Lawrence and Rachel Clevenson,  
individually;  
Leon and Cecelia Carter, individually;  
Leonard Fischer;  
Lorenzo Gama and Ylda Cisnero,  
individually;  
Loretta May Williams, aka Loretta May  
Blackburn, Trustee of the Loretta May  
Williams Revocable Living Trust;  
Lucille Jane Conforti and Randall Norman  
Kirk, individually as Co-Trustees of the  
"Lucille Jane Conforti Trust";  
Lynn and Ann Henne, individually;  
Lynn Gotch and Linda Oliver, individually;  
Manuel and Sandy Garcia, individually;  
Marilyn Wallace, Trustee of the Marilyn  
Wallace Separate Property Trust;  
Mario Aguirre and Patrice Vernand,  
individually;  
Mark and Megan Steffy, individually;  
Mark Anthony and Kim Marie Crane,  
individually;  
Mark Robbins, Trustee of the Mark Robbins  
Trust;  
Mark Thompson;  
Martin and Darian O'brien, individually;  
Martin and Linda Gramckow, individually;  
Martin Gramckow, Trustee of the Monika G.  
Huss Irrevocable Trust, Trustee of the Karin  
W. Gramckow Irrevocable Trust, Trustee of  
the Kurt J. Gramckow Irrevocable Trust;

- 1 Marvel Pierce;
- 2 MaryAnn Hepp Hill, Trustee of the Hill
- 3 Family Trust;
- 4 Mary Bergen, Trustee of the Rosemary Hall
- 5 Bergen Trust;
- 6 Mary Morrison;
- 7 Mary Walkart and William Hastings,
- 8 individually;
- 9 Matilija Canyon Alliance;
- 10 Matthew and Claudia Wilson, individually;
- 11 Matthew Arreola;
- 12 Matthew Bowe;
- 13 Matthew Dwyer and Colleen Walker,
- 14 individually;
- 15 Matthew Larrew and Jordana Kaban,
- 16 individually;
- 17 Matthew Simon and Amanda Vino,
- 18 individually;
- 19 Michael and Carol Davis, individually;
- 20 Michael and Cindy Boehm, individually;
- 21 Michael and Hannalore Gresser,
- 22 individually;
- 23 Michael and Kathy Ogden, individually;
- 24 Michael and Kim Regan, individually;
- 25 Michael and Marie Mctavish, individually;
- 26 Michael and Patricia Mcweeney,
- 27 individually;
- 28 Michael Coggins Jr. and Cynthia Coggins,
- individually;
- Michael Greynald, Trustee of the Greynald
- Family Trust;
- Michael L. Rockhold, Trustee of the Michael
- Rockhold Trust;
- Michael Tello;
- Michele Willis and Johanna Collins,
- individually;
- Miguel A. Mayorga, Trustee of the Edward
- R. Mayorga Living Trust;
- Mitchael and Rubeena Breese, individually;
- Mitchell and Ana Yount, individually;
- Mitchell and Joy Dalbey, individually;
- Mitchell and Lisa Myers, individually;
- Nancy Moore, Trustee of the Nancy Anne
- Moore Separate Property Trust;
- Nikolas and Julia Krankl, individually;
- Offshore Crane, Inc.;
- Offshore Crane and Service Company, Inc.;
- Offshore Facilities;
- Ojai Valley Conservancy;
- Orville and Marion Hernvall, individually;
- Orville and Pamela Hibdon, individually;
- Oswaldo and Norma Ruiz, individually;
- Pacific Telephone and Telegraph Company;
- Pamela Wood;
- Patric and Margaret Peake, individually;
- Patricia and Edward Lansberg, individually;
- Patricia Cuenot;
- Patrick and Cathy Pagnusat, individually;
- Paul and Angela Booth, individually;
- Paul and Ashley Ramsey, individually;
- Paul and Maria Lozano, individually;
- Paul and Martha Medlar, individually;
- Paul and Opal Skaggs, individually;
- Peter and Kelli Freiberg, individually;
- Peter and Robin Shedlosky, individually;
- Peter Brooks and Carla Brooks, individually
- and as Trustees of the Escoda Brooks Family
- Trust;
- Peter Cambier, Trustee of the Peter and
- Marilyn Cambier Trust;
- Peter Schey, LLC;
- Peuvlin Vong;
- Philip and Delia Smith, individually;
- Philip Ferrante Jr. and Nicole Aversa-
- Ferrante, individually;
- Philippe Rousseau and Kimberly Shobe,
- individually;
- Phyllis Courtney;
- Rafael Hernandez;
- Ramona L. Andrew, Trustee of the Ramona
- L. Andrews Trust;
- Rancho Arnaz, LLC;
- Rancho Casitas, LLC;
- Rancho Sueno, LLC;
- Ray and Carolina Guillen, individually;
- Raymond and Annette West, individually;
- Richard and Laura Mancilla, individually;
- Richard and Alexandra Dubeau,
- individually;
- Richard and Cynthia Robinett, individually;
- Richard Bolton;
- Richard Mathieu and Claudia Herrera
- Mathieu, individually;
- Richard Michael and Margaret Kenny,
- individually;
- Richard Wiles and Peggy Carey,



<p>1 individually; 2 Robert Alan and Stacey Jean Boyd, 3 individually; 4 Robert and Carolyn Jarboe, individually; 5 Robert and Judith Clark, individually; 6 Robert and Nickey Gregory, individually; 7 Robert and Patricia Mcfall, individually; 8 Robert and Susan Bennitt, individually; 9 Robert and Anna J. Auric, individually as 10 Trustees of the Auric Revocable Trust of 11 1999; 12 Robert Levin and Lisa Solinas, individually; 13 Robert Mark and Lorraine Melisa Lovato, 14 individually; 15 Robert OConnor; 16 Robert Petrin and Beate Schickerling, 17 individually; 18 Robert L. Stone, Trustee of the Robert L. 19 Stone Revocable Living Trust; 20 Robert S. Young, Trustee of the Young 21 Trust; 22 Ronald and Janis Calkins, individually; 23 Ronald Kaplan and Cynthia Daniels, 24 individually; 25 Rudolph and Carol Saldamando, 26 individually; 27 Russell James Hall, Trustee of the Russell 28 James Hall Family Trust; Sam and Debbie Tucker, individually; Scott Alan and Eva Prince Weiss, individually; Scott and Aki Freshman, individually; Scott and Bernadette King, individually; Scott and Sarah Mckay, individually; Scott Gregory Erockson and Hannah Beth Guzik, individually; Scott R. Johnson and Margaret Bates, individually; Serafin Calderon and Blanca Ortiz, individually; Shane and Amy Watkins, individually; Shane Nash; Sharon and Bruce Spencer, individually; Sharon Brown, Trustee of the Sharon Brown Living Trust; Shaun and Daisy Garman, individually; Shirley M. Palmer, Trustee of the Shirley Palmer Revocable Trust;</p>	<p>Skynest, LLC; Societe d'Investissement Immobiliers et Financiers Franco-Allemand, a French corporation; Stanley Stephen Roslansky and Linda Roslansky, individually as Trustees of the Roslansky Family Trust; Stephen and Carin Kally, individually; Stephen and Cindy Barrack, individually; Stephen Carr and Debra Gill, individually; Stephen M. Johnson, Trustee of the Stephen M. Johnson Living Trust; Stephen Sanford; Stephen Zane Fraser; Stuart and Nancy Rupp, individually; Sudarshan Gautam; Susan Gary; Susan M. Ralph, Trustee of the Ralph Trust; Susan Yarnell; Sushma Gujral; Suzanne Rhodes, Trustee of the Bateman- Rhodes Family Trust; T. Snyder Tamarra Barbey; Tane Charles Arnold, individually and as Trustee of the Tane C. Arnold 2006 Living Trust Teen Challenge of Southern California, Inc.; Terra Crowley; Terrance O'Connor and Kathy Franklin, individually; Terrie Longo; The Baptiste Foundation; The Ojai Valley Land Conservancy; Theodore and Judy Lucas, individually; Theodore and Norma Schneider, individually; Theodore and Tracy Mandryk, individually; Theodore Willis Malos, Jr. and Pearl B. Malos, individually and as Trustees of the Malos Family Trust,; Thomas and Christine Reed, individually; Thomas and Nikki Young, individually; Timothy and Nicole Beckett, individually; Tobias and Tania Parker, individually; Todd Henard and Kibhi Marie Henard, individually; Tropico, LLC;</p>
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Victor and Sheryl Sanchez, individually;  
Victoria and John Junkin, individually;  
Vida Vida, Trustee of the Vida Family Trust;  
Vijay and Neeta Patel, individually;  
Virginia I. Williamson, individually and as  
Trustee of Trust of Virginia I. Williamson;  
Virginia Trevino;  
Walid A. Alawar, Trustee of the Walid A.  
Alawar Living Trust;  
Warren Heath;  
William and Cheryl Meade, individually;

William and Helen Peck, individually;  
William and Irene Snively, individually;  
William and Kimbra Carnaghe, individually;  
William and Paula Stevens, individually;  
William Loughboro;  
William Starr;  
Yong Yi;  
Yvette Marie and Daniel Joseph Sinohui,  
individually;  
Zachary and Diane Totten, individually

#### Riparian and Overlying Landowners

93. City is informed and believes that the following Cross-Defendants (“Riparian and Overlying Landowners”) are owners of or are beneficial interest holders in real property located within the Ventura River Watershed and overlying one or more of Watershed’s Groundwater Basins (Upper Ventura River Groundwater Basin; Ojai Valley Groundwater Basin; Lower Ventura River Groundwater Basin; and Upper Ojai Valley Groundwater Basin), and they claim riparian rights to divert and/or extract surface and/or subsurface water from the Ventura River and/or its tributaries, whether or not they have exercised such riparian rights, and/or they claim overlying rights to extract groundwater from one or more of the Watershed’s Groundwater Basins, whether or not they have exercised such overlying rights:

1300 Shippee Lane, LLC;  
3584 Calle Moreno, LLC;  
Aaron and Angela Hoekstra, individually;  
Abel and Lourdes Carranza, individually;  
Acslayton, LLC;  
Adam Casey and Brittany Chisum,  
individually;  
Adam Distl, Jr. and Barbara B. Distl,  
individually as Trustees of the Adam Distl,  
Jr. and Barbara B. Distl 1998 Revocable  
Trust;  
Adrian Ogden;  
Aera Energy, LLC;  
Ajr Investment Partnership, LP;  
Alan and Deborah Sharon, individually;  
Alan and Leslie Connell, individually;  
Alan and Mary Kirby, individually;

Alan and Susan Ecker, individually;  
Alan Walbridge and Dorothy Fay  
Walbridge, individually;  
Alberto and Adriana Montano, individually;  
Alberto and Hilda Zamora, individually;  
Albine Hopcus and Alva Lydia Hopcus,  
individually as Trustees of the Al and Alva  
Trust;  
Alfonso and Alejandra Limon, individually;  
Allan and Janis Parkhurst, individually;  
Allan and Katharine Parigian, individually;  
Allan and Mary Doane, individually;  
Allen Vail;  
Alvaro and Elva Ruiz, individually;  
Alvin and Claudia Cunningham,  
individually;

- 1 Ana Cross, Trustee of the Ana Cross Family
- 2 Trust;
- 3 Andre Keunzli and Fabrienne Keunzli-
- 4 Monard, individually;
- 5 Andrew and Melissa Maccalla, individually;
- 6 Andrew and Rebecca Chandler, individually;
- 7 Andrew and Sharon Engel, individually;
- 8 Angela Jayne Gardner and John Percival
- 9 Mawson, individually as Trustees of the
- 10 Pleasant Avenue Living Trust;
- 11 Anita J. Diaz;
- 12 Ann H. Donlon, Trustee of the Ann H.
- 13 Donlon Revocable Trust;
- 14 Anna Archer;
- 15 Anna Kirkwood;
- 16 Anne and Daniel Goldstein, individually;
- 17 Anson B. Thacher and Anne F. Thacher,
- 18 individually as Trustees of the A. and A.
- 19 Thacher Living Trust;
- 20 Anthony Becchio and Denise Heimo,
- 21 individually;
- 22 Anthony Masiel;
- 23 Antonio Espino and Maria Torres,
- 24 individually;
- 25 Arne Anselm and Michelle Velderrain,
- 26 individually;
- 27 Arne Anselm, Trustee of the Velderrain M.
- 28 Trust;
- Ashley and Victoria Edwards, individually;
- Baldemar Alcantar and Micaela Ortiz
- Alcantar, individually;
- Barbara A. Fitzgerald, Trustee of the
- Fitzgerald 1994 Trust;
- Barbara Bonsignori;
- Barbara Chen Lowentha, Trustee of the 2017
- Barbara Kay Chen Lowenthal Revocable
- Trust;
- Barbara Hall, Trustee of the Barbara Hall
- Living Trust;
- Barnard Properties, LLC;
- Bart Kennedy;
- Barton Kennedy;
- Bernard Martin;
- Beth E. Lindley;
- Bettyann Sessing;
- Big Black Dog, LLC;
- Blaze Buonpane;
- Bradley and Andrea Roe, individually;
- Bradley and Ivelou Pantoskey, individually;
- Brand and Tressa Kahler, individually;
- Brandon and Kelsie Schneider, individually
- and as Trustees of the Brandon Schneider
- and Kelsie Simms-Schneider Family Trust;
- Breal and Karen Rowe, individually;
- Brendan Richard and Christa Lee Dawn
- Freeman, individually;
- Brent and Pamela Lamo, individually;
- Brett and Lynn Wilson, individually;
- Brett Cunningham;
- Brett Nicholson and Nan Davis,
- individually;
- Brian and Cynthia McDaniel, individually;
- Brian and Erin Edwards, individually;
- Brian and Jean Harrison, individually;
- Brian and Marie Haase, individually;
- Brian and Siobhan Calvin, individually;
- Brian A. Schaffels;
- Brian Osborne and Kirsten Hinrichs,
- individually;
- Brittany and Alan Fletcher, individually;
- Bruce and Leslie Bouche, individually;
- Bruce and Virginia Hibberd, individually;
- Bruce C. Brockman and Bridget Tsao-
- Brockman, individually as Trustees of the
- Tsao Brockman Family Trust;
- Bryan and Nicole Crawford, individually;
- Bulmaro and Alfonsa Pena, individually;
- Byron and Jennifer Greene, individually;
- Byron Rader and Myra Toth, individually;
- Cal B. Land Co., LLC;
- Calatlantic Group Inc.;
- Camp Ramah in California Inc.;
- Carl and Judith Bell, individually;
- Carl and Leigh Hyndman, individually;
- Carl Gaddis and Anna Hicks, individually;
- Carla Dennis, Trustee of the Carla D. Dennis
- Trust;
- Carla Melson and Carla J. Melson,
- individually as Trustees of the Carla J.
- Melson Revocable Living Trust;
- Carmen and Carolina Murillo, individually;
- Carol Marquez-Olson, Trustee of the Carol
- Marquez-Olson Trust;
- Carol Vesecky, Trustee of the Carol B.
- Vesecky Revocable Living Trust;

<p>1 Caroline Turner, Trustee of the Turner Survivors Trust; 2 Carolyn Bowman, Trustee of the Carolyn Bowman 2008 Trust; 3 Carolyn Huish; 4 Caryn Molinelli; Catherine Lancaster; 5 Catherine Sellman; Catherine Smith, Trustee of the Catherine L. 6 Smith Revocable Trust; Cesar and Davienne Guerra, individually; 7 Cesar Jimenez and Aura Minera, 8 individually; Chaarenne Torris and Raymond Bradley, 9 individually; Southern California Association of Seventh 10 Day Adventists; Chad Carper; 11 Chad Ress and Stephanie Washburn, 12 individually; Chad Vick, Trustee of the Chad C. Vick 13 Trust; Charlene Van Deusen; 14 Charles and Deana Sherry, individually; Charles and Jo Bennett, individually; 15 Charles G. Barnett, Successor Trustee of the 16 "Barnett Family Exemption Equivalent Trust"; 17 Charles L. Hoff and Kathleen D. Hoff, Co- Trustees of the Hoff Revocable Trust; 18 Charles Monn and Elena Hale, individually; 19 Charles R. Rudd and Lola L. Rudd, Trustees under the Charles R. Rudd and Lola L. Rudd 20 Trust; Christie Mattull, Trustee of the Christie 21 Lynn Mattull Trust; Christine and Donald Bowen, individually; 22 Christine Golden; 23 Christopher and Anna Rhoda, individually; Christopher and Gillian Borgeson, 24 individually; Christopher and Shelagh Duke, individually; 25 Christopher Corsones, Trustee of the Christopher Corsones Living Trust; 26 Christopher McGuire; 27 Christopher Sewell; Christopher Weiner and Damian Bourguet, 28 individually;</p>	<p>Cindy Burkhart, Trustee of the Cindy Burkhart Living Trust; City of Ojai; Claudia Farr, Trustee of the Sam S. Farr and Claudia S. Farr Trust; Claudia Wunderlich, Trustee of the Claudia A Wunderlich Trust; Clementine Turner, Trustee of the Clementine Turner Living Trust; Cody Green; Cody Stevens; Connie Anaise; Connie and Mark Cline, Trustee of the Mark Terry Cline Family Trust; Constance Eaton; Cory and Nicholas Wingate, individually; County of Ventura; Craig and Stephanie Gardner, individually; Craig Young and Daniel Poling, individually; Culbert Family Partnership; Curtis and Christina Tolmie, individually; Cynthia Ellis and Pamela Thomas, individually; Daj Properties, LLC; Damian and Lorie Vos, individually; Damon and Anne Brink, individually; Daniel and Adaya Walsh, individually; Daniel and Deborah Hoyt, individually; Daniel and Elizabeth George, individually; Daniel and Elizabeth McLaughlin, individually; Daniel and Jane Kelly, individually; Daniel and Lydia Ruark, individually; Daniel and Ralph Fairbanks, individually; Daniel and Tomica Mora, individually; Daniel and Yoko Mcsweeney, individually; Daniel Chryenko; Daniel Crane; Daniel H. I. and William D. Moses Jr., individually as Trustees of the William D. Moses, Jr. Separate Trust No. 1; Daniel Hultgen, Trustee of the Hultgen Living Trust; Danny Haar and Mariska De Feiter, individually; Darrell Ralston, Trustee of the Darrell Anthony Ralston 2009 Revocable Trust;</p>
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- 1 Dave and Kathleen Tarrats, individually;
- 2 David and Beverly Fulton, individually;
- 3 David and Carol Cintron, individually;
- 4 David and Deborah Todd, individually;
- 5 David and Donna Berger, individually;
- 6 David and Elizabeth Silva, individually;
- 7 David and Fereschta Sinclair, individually;
- 8 David and Karen Brubaker, individually;
- 9 David and Kathleen Ostby, individually;
- 10 David and Laura Meisch, individually;
- 11 David and Laurie Mahan, individually;
- 12 David and Meghan Sandoval, individually;
- 13 David and Mindy Benezra, individually;
- 14 David and Peggy Stanwood, individually;
- 15 David and Sandra Murillo, individually;
- 16 David and Shannon Richard, individually;
- 17 David and Sharron Sparks, individually;
- 18 David and Stephanie Berger, individually;
- 19 David and Toni Johnson, individually;
- 20 David Corey and Jean Scholes, individually;
- 21 David E. Pressey and Agnes E. Pressey,
- 22 individually as Trustees of the David E. and
- 23 Agnes E. Pressey Family Trust;
- 24 David Kille and Shannon Frew, individually;
- 25 David L. Garber and Cynthia Garber,
- 26 individually as Trustees of the Garber Trust;
- 27 David Orbach and Eva Araujo, individually;
- 28 David Stanley and Monica Bednar Stanley,
- individually;
- Dawn and Barclay Hope, individually;
- De and Jacque Pisciotta, individually;
- Dean and Gloria Vadnais, individually;
- Dean and Lorinda Strong, individually;
- Deanna Gonzales, individually;
- Deirdre Lynds, individually;
- Delavan C. Garst and Sharon D. Garst,
- individually as Trustees of the Delavan and
- Sharon Garst Family Trust;
- Dell and Anne Mercer, individually;
- Delores and Jerry Berlin, individually;
- Denise Wizman, as Trustee of the Denise
- Wizman Revocable Trust;
- Dennis and Cheryl Jacobs, individually;
- Dennis and Nadine Corte, individually;
- Derek Meek;
- Devon and Jillianne Collinge, individually;
- Diana Engle, Trustee of the Diana L Engle
- Revocable Trust;
- Diana Peron, Trustee of the Diana C Peron
- Living Trust;
- Diana Syvertson, Trustee of the Diana
- Syvertson Living Trust;
- Diana Trent, Trustee of the Diana Trent
- Living Trust;
- Diane and William Clegg, individually;
- Dianne Mccourtney, Trustee of the Dianne
- Louise Mccourtney Trust;
- Dolores Keith;
- Dominic Habibi;
- Donald and Clara Tenpenny, individually;
- Donald Brosnac and Twila Carlsen,
- individually;
- Donald Davis;
- Donald G. and Susan B. Davis, individually
- as Trustees of the Donald G. and Susan B.
- Davis Revocable Family Trust of 1997;
- Donis Montoya Jr. and Teresita Montoya,
- individually;
- Donna Deitch, Trustee of the Donna E.
- Deitch Trust;
- Donna Epstein, Trustee of the Epstein
- Survivors' Trust, Trustee of the Epstein
- Marital Trust, and Trustee of the Epstein
- Bypass Trust;
- Dorothy and James Kehoe, individually;
- Dorthea Keck;
- Douglas and Ann Parent, individually;
- Douglas and Claudia Webber, individually;
- Douglas and Elisabeth Vernand,
- individually;
- Douglas and Kathleen Leighton,
- individually;
- Douglas and Moira Volpi, individually;
- Douglas Draper;
- Douglas Wasson, Trustee of the Wasson
- Trust;
- Dustin Beilke;
- Ed and Linda Colby, individually;
- Edson Taft, Trustee of the Edson B. Taft
- Revocable Trust;
- Edward and Deborah Guerra, individually;
- Edward and Laura Savala, individually;
- Edward and Nancy Dennis, individually;
- Edward and Nancy Necker, individually;
- Edward and Roberta Walsh, individually;

1 Edward Dunn and Judith Shelby Dunn,  
2 individually;  
3 Edward Pressey;  
4 Edwin Norris Procter, Trustee of the "E.  
5 Norris Procter Living Trust";  
6 Eilam Byle, Trustee of the Eilam Byle  
7 Living Trust;  
8 Eileen Sterling, Trustee of the Eileen M.  
9 Sterling Revocable Trust;  
10 Eileen Walker;  
11 El Sereno 1225, LLC;  
12 Elaiene Keeley, Trustee of the Elaiene  
13 Keeley Trust;  
14 Elaine Ferguson;  
15 Eli and Jessica Neiderhiser;  
16 Elia Aldapa;  
17 Elizabeth Bauer, Trustee of the Elizabeth A  
18 Bauer Trust;  
19 Ellen Leopold;  
20 Elmer and Joan Swift;  
21 Emily Benson and Lisa Martel, individually;  
22 Emily Clay and Matthew Goodman,  
23 individually;  
24 Erbay and Velda Garcia, individually;  
25 Eric and Arlene Schwerdtfeger, individually;  
26 Eric and Jolene Harrington, individually;  
27 Eric Bush and Craig Young, individually;  
28 Eric Dilks, Trustee of the Eric M. Dilks 2004  
Revocable Trust;  
Eric Goode;  
Eric Moore;  
Eric Rosenberg;  
Ernest and Dorothy Nichols, individually;  
Ernest Thornsberry, Trustee of the Ernest  
Thornsberry Revocable Trust;  
Esperanza and Sandra Guerrero,  
individually;  
Eugenijus Valiulis, Trustee of the Eugenijus  
Valiulis Revocable Living Trust;  
Eusebio and Lori Navarro, individually;  
Evelyn Baran, Trustee of the Evelyn F Baran  
Personal Residence Trust;  
Ezequiel and Amber Monarrez, individually;  
Felix and Delmy Garcia, individually;  
Fernando Porras;  
Feroz and Mona Zaidi, individually;  
Finch Farms, LLC;  
Merewether Judson, LLC;

Floyd and Charlene Fitzgerald, individually;  
Floyd Eugene Wiancko and Hiroko  
Wiancko, Trustees of the Wiancko Family  
Trust;  
Forest Home, Inc.;  
Fortune Real Estate 888, LLC;  
Francis and Shauna Longstaff, individually;  
Francisco and Angelica Valles, individually;  
Frank and Lila Sheltren, individually;  
Frank C. Urias and Evangeline S. Urias,  
individually as Trustees of the Urias Family  
Trust;  
Frank Charolla;  
Frank Edward Sheltren, Jr., aka Frank E.  
Sheltren and Rita Cheryl Sheltren,  
individually as Trustees of the Sheltren  
Family Trust;  
Fred and Carine Fisher, individually;  
Fred and Donna Stevens, individually;  
Fred Kramer and Michaela Watkins,  
individually;  
Frederic Devault;  
Frederick and Laura Fulmer, individually;  
Frederick Sloman and Nordi Hintze,  
individually;  
Fredrick and Roxanne Baker, individually;  
Future Mhps, LLC;  
Gabriel and Margarita Mendoza,  
individually;  
Gale and Bernabe Gaona Jr., individually;  
Gary and Chari Petrowski, individually;  
Gary and Colleen Fry, individually;  
Gary and Jolene Clarke, individually;  
Gary and Judith Stever, individually;  
Gary and Patricia Tucker, individually;  
Gary and Teresa Downard, individually;  
Gene and Patty Saito, individually;  
Genneva Maschler and Richard Yaciuk,  
individually;  
Geoffrey and Paula Clarke, individually;  
Geoffrey Brown and Stephanie Gibson,  
individually;  
George and Linda Boston, individually;  
George and Lynn Malone, individually;  
George and Margaret Melton, individually;  
George and Sigrid Bressler, individually;  
George Stuart;  
Gerald and Darlene Carlson, individually;

- 1 Gerard Linsmeier;
- 2 Gerben and Jill Hoeksma, individually;
- 3 Gino Lynch;
- 4 Glenn Myers, Trustee of the Glenn C. Myers
- 5 Family Trust;
- 6 Gordon and Terry Hanusek, individually;
- 7 Gordon Gibbons, Trustee of the Gordon R.
- 8 Gibbons Living Trust;
- 9 Grant Kemp;
- 10 Greg and Julie Tebo, individually;
- 11 Gregg and Rosie Dierickx, individually;
- 12 Gregg Olson, Trustee of the Gregg W. Olson
- 13 Revocable Trust;
- 14 Gregory and Kaori Golden, individually;
- 15 Gregory and Martha Lepine, individually;
- 16 Gregory and Sarah Delvecchio, individually;
- 17 Gregory and Susan Gilbert, individually;
- 18 Gregory and Susan Ignacio, individually;
- 19 Gregory and Suzanne Combs;
- 20 Gregory Heras and Rozanne Bonavito,
- 21 individually;
- 22 Gregory Johnson;
- 23 Gregory N. Pimstone and Lauryn B. Harris,
- 24 individually as Trustees of the Pimstone
- 25 Family Trust;
- 26 Griffin and Nicole Williamson, individually;
- 27 Gudaz, LLC;
- 28 Guy and Sheri Flasch, individually;
- Guy Bratton;
- H and Beverly Leard, individually;
- Hacienda Ladera, LLC;
- Hank and Alana Garcia, individually;
- Hans and Eileen Van Koppen, individually;
- Harald Wagner;
- Harlan Kossow;
- Harrison Hill and Lauren Wilson,
- individually;
- Harry and Marilyn Lehr, individually;
- Harry Joe;
- Hayden and Raquel White, individually;
- Heidi C. Kurtz, Trustee of the Gunild Walsh
- Seadrift Qprt FBO Heidi C. Kurtz;
- Hector and Rocio Torres, individually;
- Heliberta Valencia;
- Help of Ojai, Inc.;
- Henry and Moira Tarmy, individually;
- Hermann and Gay Thomsen, individually;
- H. H. Leard and Beverly Leard, individually
- as Trustees to the Leard Family Trust
- Hickey Bros Land Co. Inc.;
- Holly Bassuk;
- Howard and Ruth Miller, individually;
- Howard Altman, Trustee of the Gerta Maritz
- Trust;
- Hoyt Tarola;
- Ian and Carol Atkinson, individually;
- Ignacio and Rose Vega, individually;
- Imelda Mares, Trustee of the Imelda Mares
- Trust;
- Industrial Ventura;
- Integritas Ojai, LLC;
- Irma Cruz;
- Irshad and Linda Haque, individually;
- Isidro Sanchez;
- J Investments;
- J McGlinchey;
- Jack and Marie Kenton, individually;
- Jack and Simone Patterson, individually;
- Jack and Verna Turbyville, individually;
- Jacob and Anja Zimmerman, individually;
- Jacqueline Dorfman, Trustee of the
- Jacqueline Dorfman Revocable Living Trust;
- Jacqueline Urband;
- Jakob and Marianne Vos, individually;
- James and Alisa Varney, individually;
- James and Daniela Casey, individually;
- James and Dori Sandefer, individually;
- James and Janet Lecroy, individually;
- James and Laura Fernandez, individually;
- James and Maryetta Sanders, individually;
- James and Penny Harvey, individually;
- James and Randi Catlett, individually;
- James and Wendy Osher, individually;
- James Data;
- James Finley, Trustee of the James and M.
- Reen Finley Family Trust;
- James Finch, Trustee of the Finch Family
- Trust;
- James J. Finch and Lorraine Holve Finch,
- individually as Trustees of the James J.
- Finch and Loraine Holve Finch Living Trust;
- James Paul Finch;
- James Kirk and Jacelyn Hayes, individually;
- James Selman, Trustee of the James C.
- Selman Revocable Inter Vivos Trust;



<p>1 James W. Coultas and Margaret Coultas, 2 Trustees of the James A. and Margaret H. 3 Coultas Intervivos Trust; 4 Terry Coultas Wilson; 5 James W. Coultas, Trustee of the Coultas 6 Living Trust; 7 Jan and Priscilla Granade, individually; 8 Jane Mccord, Trustee of the Jane Ann 9 Mccord Living Trust; 10 Janet Mccinnis, Trustee of the Janet Karen 11 Mccinnis Trust; 12 Janice and Jesse Hillestad, individually; 13 Janice Hall, Trustee of the Hall Trust; 14 Janis Long Nicholas and Jess E. Long, 15 individually as Co-Trustees of the Long 16 Family Trust; 17 Jason and Jene Loomis, individually; 18 Jason and Kathryn Headley, individually; 19 Jason and Lana Spear, individually; 20 Jason Loomis; 21 Jasper and Jessica Jones, individually; 22 Jayne Pendergast, Trustee of the 2014 Jayne 23 E Pendergast Trust; 24 Jeff and Cheree Simons, individually; 25 Jeff and Desiree Wilby, individually; 26 Jeff Mabry; 27 Jefferie Skaggs and Timothy Bunce, 28 individually; Jeffrey and Denise Helm, individually; Jeffrey and Donna Meyer, individually; Jeffrey and Holly Lieber, individually; Jeffrey Jenson; Jeffrey Kenton, Trustee of the Jeffrey T. Kenton 2004 Revocable Living Trust; Jeffrey S. Bacon, Trustee of the Villa Nero Trust; Jeffrey Weinstein; Jeffrey and Fiona Pougher, individually; Jennifer Kistler, Trustee of the Jennifer L Kistler Trust; Jeremy and Britannia Rennie, individually; Jeri Leonard; Jerome H. Hittleman and Lynne M. Goldfarb, Trustees of the Jerome H. Hittleman and Lynne M. Goldfarb Revocable 2016 Trust; Jerry Dean Miner and Geraldine Ann Miner, Trustees of the Miner Trust;</p>	<p>Jess Earl Long; Jessie Stricchiola and Rosemary Garrison, individually as Trustees of the Phoenix Revocable Trust; Jesus and Maria Ramos, individually; Jill Olivares, Trustee of the Jill Ann Olivares Revocable Living Trust; Jimmy and Theresa Ramirez, individually; JLB Rancho Vista, LLC; Joan Geddes and John Saluppo, individually; Joan Robles; Joann Benson, Trustee of the Joann Alva Benson Revocable Living Trust; Joanne Barnes, Trustee of the Barnes Family Trust; Joel Fox and Jennifer Day, individually; Joel Vuylsteke, Trustee of the Country Club Trust; Johanna Rae Long; John and A. Elrod, individually; John and Alitea Maruszewski, individually; John and Crystal Peakes, individually; John and Janis Nicholas, individually; John and Lucille Elrod, individually; John and Monica Hartmann, individually; John and Norma Curtis, individually; John and Parris Collins, individually; John and Patricia Essick, individually; John and Tonya Peralta, individually; John and Victoria Bortolussi, individually; John Battel, Trustee of the John J Battel Living Trust; John Broomfield, Trustee of the John Nicholas Broomfield Trust; John F. Johnston and Katherine M. Johnston, individually as Trustees of the John Fraser Johnston Family Trust; John Haigh, Jr.; John Kertis; John Mutlow; John Pace, Trustee of the John Brice Pace Family Trust; John Richardson; John Vineyard; John Warner and Jennifer Dunn, individually; John Willingham; John Winspear;</p>
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<p>1 John Young; 2 Jonathan Wong and Jan Komura, 3 individually; 4 Jose and Imelda Hurtado, individually; 5 Jose and Lisa Mendez, individually; 6 Jose Arreola Jr. and Paola Carreno, 7 individually; 8 Jose Olvera and Alma Valenciano, 9 individually; 10 Joseph and Drenda Pledger, individually; 11 Joseph Lynn and Elvira Lilly Barthelemy, 12 individually and Trustees of the Joseph Lynn 13 Barthelemy and Elvira Lilly Barthelemy 14 2002 Family Trust; 15 Joseph and Kathleen Lasalle, individually; 16 Joseph and Michelle Harwell, individually; 17 Joseph and Nina Neulight, individually; 18 Joseph and Shirley Gholson, individually; 19 Joseph Lam; 20 Joseph Randall, Trustee of the Joseph 21 Darden Randall Revocable Trust; 22 Joseph Reeseigh; 23 Joseph Tooker; 24 Joshua and Jennifer Goldstein, individually; 25 Joshua Moreau; 26 Joyce and Frank Patota, individually; 27 Juan and Gloria Estrada, individually; 28 Juan and Maria Martinez, individually; Judith Reichman and Harold Brown, individually; Julianne Bloomer and Philip Rabe, individually; Julie Centeno; Julio Luna and Debbie Lun, individually; June Sears, Trustee of the June Katherine Sears Living Trust; Jupeto Properties, LLC; Kac LLC; Karen L. Hanson and Lawrence S. Hanson, Trustees of the Hanson L.S. Revocable Living Trust; Karen Phipps, Trustee of the Phipps Family Trust; Karin Dron, Trustee of the Boyd S. Dron and Karin K. Dron Joint Living Trust; Karin L. James, Trustee of the James Family Trust; Karl and Beverley Mallette, individually;</p>	<p>Katharine and John Broesamle, individually; Kathleen and Adam Morrison, individually; Kathleen and Thomas German, individually; Kathleen Bachelor; Kathleen Nolan, Trustee of the Kathleen Ann Nolan Revocable 2006 Family Trust; Kathryn Bartholomew, Trustee of the Kathryn Oconnor Bartholomew Living Trust; Kathy Alderman; Katz Pincetl Orchard, LLC; Kay Dornbusch, Trustee of the The Dornbusch Family Living Trust; Keith and Anahid Jewett, individually; Keith and Robin Lawson, individually; Keith and Victoria Nightingale, individually; Kelley and John Dyer IV, individually; Kelvin Dodd and Deborah Gomez, individually; Kenett Niessen; Kenneth and Anne Boydston, individually; Kenneth and Brenda Whitteker, individually; Kenneth and Carol Fergeson, individually; Kenneth and Elizabeth Gruber, individually; Kenneth and Laura Brown, individually; Kenneth and Michael Ballard, individually; Kenneth and Sarah Van Dyke, individually; Kenneth Morgan; Kenneth Vadnais; Kern County; Kevin and Asli Ruf, individually; Kevin and Jennifer White, individually; Kevin and Joanne Olsland, individually; Kevin and Jodi Dunn, individually; Khaled A. Al-Awar and Sheryl L. Al-Awar, individually as Trustees of the K. and S. Al- Awar Family Trust; Kiki Lyon, Trustee of the Kiki Lyon Living Trust; Kim Hanna, Trustee of the Hanna Family Trust; Kristan Altimus; Kurt and Dayna Roggenstroh, individually; Kurt and Luisa Neher, individually; Kurt Patrick Zierhut and Stephanie Lee Zierhut, Co-Trustees of the Living Trust of Kurt Patrick Zierhut and Stephanie Lee Zierhut;</p>
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<p>1   Lanspring, LP; 2   Larry and Joyce Heath, individually; 3   Larry Davis; 4   Larry Hubenthal, Trustee of the Larry 5   Hubenthal Living Trust; 6   Larry Neff, Trustee of the Larry Neff Trust; 7   Las Encinas Mobile Home Park; 8   Laura B. Peck and Andrew D. Viles, 9   individually as Trustees of the William L. 10   and Laura B. Peck Trust - Marital Trust; 11   Laura Green, Trustee of the Green Survivors 12   Trust; 13   Laurie Johnson, Trustee of the Laurie A. 14   Johnson Living Trust; 15   Laurie Smith; 16   Lawrence and Sharon McMillan, 17   individually; 18   Lawrence I. and Patricia A. Hartmann, 19   individually as Trustees of the Larry and Pat 20   Hartmann Family Trust; 21   Lee and Janet Cassel, individually; 22   Lee Fitzgerald, Trustee of the Lee I 23   Fitzgerald 2007 Revocable Living Trust; 24   Lee Lebeck; 25   Lee Rosenbaum, Trustee of the Chief 26   Cornerstone Trust; 27   Leon and Caroline Pahle, individually; 28   Leonard Petitt and Kay Rolfe, individually; 29   Leslee and Terry Gustafson, individually; 30   Leslie McCleary; 31   Lester L. and Linda L. Barbee, individually 32   as Trustees of the Lester L. Barbee and 33   Linda L. Barbee Joint Revocable Living 34   Trust; 35   Liana Harp and Nathan Jones, individually; 36   Lilian Ruvalcaba; 37   Linda Chapman, Trustee Linda of the Jean 38   Chapman Living Trust; 39   Linda Griffin; 40   Linda McLaughlin, Trustee of the Linda 41   Landrieu McLaughlin Living Trust; 42   Linda Oliver, Trustee of the Linda A Oliver 43   2005 Revocable Living Trust; 44   Lipka Richard, Trustee of the Lorraine Trust; 45   Lisa Lopez and Brian Merrill, individually; 46   Lisa Smith and Nathaniel Cox, individually; 47   Lloyd Smith; 48   Logan and Misty Hagege, individually;</p>	<p>Logan and Tiffany Gould, individually; Lois Stone Erburu, as Trustee of the Surviving Spouse's Trust created in the Robert and Lois Erburu Living Trust; Lon and Margareta Kirkgaard, individually; Longhorn Lane, LLC; Lorene Cleary; Lori Schloredt; Lou and Barton Matthews, individually; Louis Gutierrez, Jr. and Irene Gutierrez, individually; Louis Price; Louise and Gary Culver, individually; Louise Konstanzer, Trustee of the Ron and Louise Konstanzer Family Trust; Louise Tindle, Sole Trustee of the "Bypass Trust" created under the Tindle Trust; Luis Herrera and Kimberly Oyama, individually; Lupe Milner, Trustee of the Lupe Milner Family Trust; Lydia Jimenez; Lyle and Cecilia Hallblom, individually; Lyndon Hebenstreit; Lynn Coleman; Lynn Pike, Trustee of the Lynn 2016 Trust; Lysiane Wallis; M. Snyder; Malcolm and Brenda Knight, individually; Malcolm and Kelley McDowell, individually; Mandy Macaluso, Trustee of the Living Trust of Mandy Macaluso; Manuel Almeida and Kevin Bagley, individually; Marcus and Amy Hueppe, individually; Marcus and Eva Kettles, individually; Margaret M. Aldrich, Trustee of the Russell F. Aldrich and Margaret M. Aldrich "Decedent's Trust," and Trustee of the Russell F. Aldrich and Margaret M. Aldrich Living Trust; Margo Kelly, Trustee of the Kelly Trust; Maria Blasco; Maria Collins; Marie W. Wallace, Trustee of the Marie Weismiller Wallace Separate Property Trust; Marika Zoll;</p>
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- 1 Marilyn Sweeney, Trustee of the Marilyn
- 2 Sweeney Revocable Living Trust;
- 3 Mario and Shawn Reyes, individually;
- 4 Marion and Betty Earnest, individually;
- 5 Mark and Colleen Rusin, individually;
- 6 Mark and Connie Cline, individually;
- 7 Mark and Helen Moskovitz, individually;
- 8 Mark and Marcia Albertsen, individually;
- 9 Mark Bellini;
- 10 Mark W. Etchart, Trustee of the Mark W.
- 11 Etchart Separate Property Trust, and Trustee
- 12 of the Michel A. Etchart Separate Property
- 13 Trust;
- 14 Marsha MacDonald;
- 15 Marshall and Dina Murphy, individually;
- 16 Martha Fast, Trustee of the Martha L Fast
- 17 Living Trust;
- 18 Martha Laliberte;
- 19 Martha Moran;
- 20 Martin and Barbara Pops, individually;
- 21 Martin and Natalie Ehrlich, individually;
- 22 Martin and Patricia Henderson, individually;
- 23 Mary and Thomas Snow, individually;
- 24 Mary Downer, Trustee of the Arthur and
- 25 Mary Downer Family Trust;
- 26 Mary L. Vomund, Trustee of the Mary L.
- 27 Vomund 1987 Trust;
- 28 Mary Thomas, Trustee of The Thomas
- Survivors Trust;
- Mary Wingate, Trustee of the Mary Louise
- Wingate Trust;
- Mattawa and Rond Larue Clements,
- individually;
- Matthew and Judy Farmer, individually;
- Matthew and Kimberly Hultgen,
- individually;
- Max Reed;
- Maximiano and Norma Ortiz, individually;
- J. McGlinchey;
- McNell Creek Ranch, a general partnership;
- McNell Properties, LLC;
- Melesio Ramirez;
- Melissa Van Sienen;
- Merl and Kim Melstrand, individually;
- Michael and Allison Sedlak, individually;
- Michael and Annel La Barge, individually;
- Michael and Barbara McCarthy,
- individually;
- Michael and Bernard Clark, individually;
- Michael and Carol Jackson, individually;
- Michael and Dianna Farrar, individually;
- Michael and Heidi Bradbury, individually;
- Michael and Kimberly Robertson,
- individually;
- Michael and Nancy Krumpeschmidt,
- individually;
- Michael and Sharon Williams, individually;
- Michael and Sonja Barrett, individually;
- Michael and Terri Imwalle, individually;
- Michael Chambliss;
- Michael Hoover, Trustee of the Michael
- Hoover Living Trust;
- Michael Kelley;
- Michael L. Delamore and Deborah Finley-
- Delamore, individually as Trustees of the
- Delamore Finley Family Trust;
- Michael Lombardo, Trustee of the Michael
- Lombardo Living Trust;
- Michael Marietta, individually and as
- Trustee of the Marietta Separate Property
- Trust;
- Michael Prentice;
- Michael Purdy, Trustee of the Purdy Family
- Revocable Trust;
- Michael Saleh, Trustee of the Saleh and Lea
- Saleh 1984 Family Trust;
- Michael T. Marshall and Lisa Skyheart
- Marshall, individually as Trustees of the
- Marshall Living Trust;
- Micky Froelich;
- Miguel and Elvia Ramirez, individually;
- Miguel Estrada;
- Murelle Stevens, Trustee of the Stevens
- Family Trust;
- Nancy Ferrell, Trustee of the Nancy A.
- Ferrell Family Trust;
- Nancy Graham;
- Nancy Jackson, Trustee of the Nancy J.
- Jackson Living Trust;
- Natalia Moore, Trustee of the Moore Family
- Trust;
- Nathan Allen;
- Nathaniel and Suzette O'Grady,
- individually;

<p>1 Nathaniel Traudt and Karen Traudt, 2 individually and as Trustees of the Traudt 3 Family Trust; 4 Neil and Patricia Friedrichsen, individually; 5 Neil Kreitman, Trustee of the Neil Kreitman 6 Living Trust; 7 Nick and Morna Taminich, individually; 8 Nick Daily; 9 Nina Menconi; 10 Nye Ranch, LLC; 11 Oak Haven, LLC; 12 Oak View Sanitary District; 13 Krishnamurti Foundation of America; 14 Oilfield Service and Truck Co.; 15 Oilfield Service and Truck, Inc.; 16 Ojai Assembly of God, Inc., dba Ojai's 17 Church of the Living Christ, Inc. 18 Ojai Home, LLC; 19 Ojai Unified School District; 20 Ojai Valley Athletic Club; 21 Ojai Valley Land Conservancy; 22 Ojai-Jackman, LLC; 23 Ole Behrendtsen; 24 Olga and Trent Jones, individually; 25 Orin Jr. and Karen Chappell, individually; 26 Orville Hernvall, Trustee of Hervnall Orville 27 and Marion Orville Trust; 28 Oscar and Mary Kaas, individually; Oscar Acosta, Trustee of the Acosta Trust; OST Trucks and Cranes; Ovis, LLC; Pamela Grau, Trustee of the Pamela Grau Living Trust; Pamela Melone, Trustee of the Pamela M. Melone Living Trust; Patricia Boan and Alina Hoffman, individually; Patricia Boan and John Hoffman, individually; Patricia Marshall, Trustee of the Patricia Ann Marshall Trust; Patricia McPherson; Patricia McGann; Patricia Unruhe and Andrew Jarvis, individually; Patrick Henderson and Jessica Maharry, Trustees of the Maharry Henderson Family Trust;</p>	<p>Patrick Tumamait; Paul and Aldine Hennigan, individually; Paul and Janet Bailey, individually; Paul and June Clem, individually; Paul and Kim Robie, individually; Paul and Maelyn Ebert, individually; Paul and Sally Centeno, individually; Paul Fonteyn, individually; Paul Holahan and Julie Grist, individually; Paul Lepiane and Bo Bengtson, individually; Paula Brown, Trustee of the Paula Jean Brown Trust; Paula Lasiter; Paula McCullough, Trustee of the Paula J. McCullough Living Trust; Pauline Mercado, Trustee of the Pauline Mercado Revocable Trust; Pedro Cisneros; Pedro Tepesano; Per and Inge Christiansen, individually; Perry Family, LLC; Peter and Linda Daprix, individually; Peter and Norma Dworkis, individually; Peter Dufau; Peter Passell; Peter Strauss and Rachel Ticotin, individually; Petrochem Development I, LLC; Philip and Darylyn Long, individually; Philip and Mary Pierpont, individually; Philip and Robert Pierpont, individually; Philippe and Betsy Caland, Trustees of the Philippe M. and Betsy C. Trust; Preparatory Villanova; Quint Morris; Rachel Kondor and Brian Segee, individually; Rafael and Magdalena Villalpando, individually; Raffi J. Mesrobian and Myrna R. Mesrobian, individually as Trustees of the Mesrobian Family Trust; Rainer Buschmann and John Johnston, individually; Ralph and Lynne Lundy, individually; Ramaa Mosley;</p>
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1 Randal R. O'Connor, Successor Trustee of  
2 the Red Clay Trust, and Successor Trustee of  
3 the Le Cedre Trust;  
4 Ranjit Sevaprakasam;  
5 Ray Hall, Trustee-in-Trust of the 30 Acre  
6 Trust;  
7 Raymond and Esther Kardly, individually;  
8 Raymond and Eva Lyons, individually;  
9 Raymond Magee and Linda Taylor,  
10 individually;  
11 RDK Land, LLC;  
12 Rebecca Adams;  
13 Red Mountain Land and Farming, LLC;  
14 Reeves Orchard, LLC;  
15 Refugio Gomez;  
16 Rex and Heidi Lanning, individually;  
17 Reynolds Fleming;  
18 Ricardo Gonzalez;  
19 Richard and Billie Sumner, individually;  
20 Richard and Emily Cargill, individually;  
21 Richard and Katherine Godfrey,  
22 individually;  
23 Richard and Lee Harper, individually;  
24 Richard and Marilyn Kallas;, individually  
25 Richard and Nancy Francis, individually;  
26 Richard and Teresa Turner, individually;  
27 Richard Dodson, Trustee of the Richard E.  
28 Dodson 2010 Revocable Trust;  
Richard Francis;  
Richard Frey and Wendy Appleby,  
individually;  
Richard and Emma Kline, individually;  
Richard Lowen;  
Richard Magana;  
Richard Mcgrath, Trustee of the Richard K  
McGrath Living Trust;  
Richard Sojka;  
RJPR Ltd. Partnership;  
Robert and Anamaria Schmid, individually;  
Robert and Antoinette Tivy, individually;  
Robert and Diana Petropulos, individually;  
Robert and Dianne Stone, individually;  
Robert and Dominique Daniels, individually;  
Robert and Dora Balitzer, individually;  
Robert and Emily Martin, individually;  
Robert and Gaea Cannaday, individually;  
Robert and Geraldine Hunsaker,  
individually;

Robert and Jacqueline McDaniel,  
individually;  
Robert and Janice Hastie, individually;  
Robert and Marilyn Salas, individually;  
Robert and Maureen Young, individually;  
Robert and Sheila Ghen, individually;  
Robert and Sonia Rodarte, individually;  
Robert and Taundra Roddick, individually;  
Robert and Anna J. Auric, individually as  
Trustees of the Auric Anna J. Family Trust;  
Robert Calder Davis, Jr., Trustee of the  
Robert Davis Surviving Spouse's Trust,  
Trustee of the Davis Family Bypass Trust  
and Trustee of the Davis Family Trust;  
Robert Dekkers;  
Robert Erickson and Ronald Wilson,  
individually;  
Robert Grasmere;  
Robert Polidori and Brittany Sanders,  
individually;  
Roberto and Maria Alonso, individually;  
Rocky Mann;  
Roderick and Joyce Greene, individually;  
Roger and Susan Dickens, individually;  
Roger Burke;  
Roger Haley; Trustee of the Roger and  
Christina Haley Survivors Trust;  
Roger Walker;  
Rogers-Cooper Memorial Foundation;  
Ronald and Bette Bluhm, individually;  
Ronald and Julia Bruns, individually;  
Ronald Blood and Linda Jordan,  
individually;  
Ronald E. Novak and Linda L. Lewis,  
individually as Trustees of the Novak Family  
Trust;  
Ronald K. Freeland and Doreen Freeland,  
individually as Trustees or their successors  
in interest of the Freeland Trust and any  
amendment;  
Ronald L.R. Hill and Debi R. Hill, Trustees  
of the R&D Hill Family Trust;  
Ronald Vogt;  
Rosemarie Singer;  
Rosemary Payne, Trustee of the Rosemary  
Payne Trust;  
Ross Anderson;

<p>1 Rowland A. Hill II and Brenda M. Hill, 2 individually as Trustees of the Trust dated 3 November 1, 2002; 4 Roy Hicks, Trustee of the Roy and 5 Jacquelyn Hicks Family Trust; 6 Ruben and Marisa Martinez, individually; 7 Ruben Chavez; 8 Ruben Magana and Janette Lupercio, 9 individually; 10 Rudy Baez; 11 Russel and Laura Alford, individually; 12 Russell and Golden Wiley, individually; 13 Russell Waldrop, Trustee of the Russell B. 14 Waldrop Living Trust; 15 Ryan and Lauren Nichols, individually; 16 Sabino and Nicki Perez, individually; 17 Sabrina Venskus, Trustee of the Sabrina 18 Venskus Living Trust; 19 Sally Crain; 20 Salvatore Scarpato; 21 Samuel and Joanna Schindel, individually; 22 Samuel Eaton; 23 Santa Ana Ranch, Inc.; 24 Sarah Young; 25 Saunie Krewson; 26 Scott and Brittany Denton, individually; 27 Scott and Carol Rasmussen, individually; 28 Scott and Keela Allison, individually; Scott and Maria Hertzog, individually; Scott and Michele Supan; Scott Chasse, Trustee of the Scott Chasse Revocable Living Trust; Scott Forsyth and Joy Fedele, individually; Scott Lundy, Trustee of the Scott Lundy Trust; Scott Luttenberger and Natasha Wilcox, individually; Scottie Monical; Sean and Leslie Bennett, individually; Serafin and Martha Flores, individually; Sevan Gerard; Shahram Shahrokhfar and Dina Nava, individually; Shanks Investment Group, LLC; Shawn Fulbright, Trustee of the Shawn Fulbright 2014 Revocable Trust; Shawn Reed; Shell Oil Co.;</p>	<p>Sherrice and John Weeces, individually; Sherrie Daily; Sheryl Shushan; Shippee, LLC; Shull Bonsall, Jr., Trustee of the Shull Bonsall Family Trust; Evangeline Bonsall Smith, a married woman; Sidney and Jayne Rice, individually; Steven P. Smith and Lynn Davis-Smith, individually as Trustees of the Smith Revocable Living Trust; Southern California Edison Co.; Southern California Associated Investors, Ltd.; Spencer and Bailey Hill, individually; SRPS, LP; Stacy Cadenasso; Stanley and Theresa Wyatt, individually; Stanley and W Hubbell, individually; State of California, Department of Transportation; Stefan Kozak and Ana Lopes, individually; Stephanie and Cheryl Beas, individually; Stephen Matzkin, Trustee of the Stephen Matzkin Trust; Stephen Turner, Trustee of the Stephen R. Turner Living Trust; Steven and Brent Kanaly, individually; Steven and Christine Vaughan, individually; Steven and Ka Rapholz, individually; Steven and Karen Erickson, individually; Steven and Krissell Dutter, individually; Steven Elliot Edelson, Trustee of the Los Angeles Entertainment Trust; Sumeet Bhatia and Michael McDonald, individually; Sumpuran Khalsa, Trustee of the Sumpuran S. Khalsa Living Trust; Suria and John Gottesman, individually; Susan Bee, Trustee of the John and Susan Bee Family Trust; Susan Conley, Trustee of the William and Susan Conley Family Trust; Susan Diller, Trustee of the Susan J Diller Trust; Susan Garand;</p>
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<p>1 Susan Gruber, individually and as Trustee of 2 the Susan Gruber Living Trust; 3 Susan McCord-Neufeld; 4 Susan Moll; 5 Susan Webster; 6 Suzanne Harvey, individually and as Trustee 7 of the Suzanne G. Harvey Revocable Trust; 8 T Bone Holdings, LLC; 9 Tanya Smith and Michael Montano, 10 individually; 11 Tanya Starceвич; 12 Ted Robinson, Trustee of the Robinson 13 Family Trust; 14 Telos Development Ojai, LLC; 15 Terry Wilson, Trustee of the Terry Coultas 16 Wilson Living Trust; 17 The Ojai Rental, LLC; 18 The Roman Catholic Archbishop of Los 19 Angeles, a sole corporation; 20 Theodor and Lore Exner, individually; 21 Theresa Stark; 22 Thomas and Cynthia Carver, individually; 23 Thomas and Nanette Benbrook, individually; 24 Thomas and Jadona Collier Harper, 25 individually; 26 Thomas Jackson; 27 Thomas Tamplin and Michelle Wells, 28 individually; Thomas Walbridge, Trustee of the Thomas C Walbridge Trust; Three Oaks, LLC; Three Sisters Orchard, LP; Timothy and Cheryl Austin, individually; Timothy and Kathleen McHugh, individually; Timothy and Kathryn Moran, individually; Timothy and Linda Turner, individually; Timothy and Mary Williamson, individually; Timothy Jones; Todd and Christina McGinley, individually; Todd Ryan and Jessica Click, individually; Todd Tullett, Trustee of the Todd Tullett Revocable Living Trust; Tom and Nancy Roland, individually; Tony and Heather Carlos, individually; Tracey and Melanie Boulton, individually; Trent and Kris Greco, individually; Tyler and Maria Barrell, individually;</p>	<p>Tyler Labine and Carrie Ruscheinsky, individually; Uldine and Fabien Castel, individually; Uriel and Chieko Lopez, individually; US Natural Resources, Inc.; Vanlaw Investment Corp.; Ventura Land Trust; Ventura Unified School District; Vicente Guzman; Vicki Daw; Vicki L. Hollingsworth, Trustee of the Hollingsworth Trust; Virginia M. McCarthy, Trustee of the Virginia M. McCarthy Living Trust; Virginia Siegfried, Trustee of the Virginia A. Siegfried Revocable Trust; Vivian Arber; Vivienne Moody; Walter and Evelyn Golis, individually; Walter and Linda Boysiewick, individually; Walter McGowan, Individually and as Trustee of the Walter Robert McGowan 1995 Trust; Wanda and Meniford Canterbury, individually; Watermark Carp II LLC; Wayne Tate and Janice Priebe-Tate, individually as Trustees of the Tate Trust, as community property; Weiss Investment Properties; Wendy and David Churchill, individually; Werner and Elva Fischer, individually; Wesley Scott and Kasey Perins, individually; West Crag Glen Smith, Successor Trustee of the Melissa Irene Elizabeth Smith Irrevocable Special Needs Trust - 1993; Willi and Stefanie U. Coeler, individually and as Trustees of the W. and S. Coeler Living Trust; William and Cynthia Anderson, individually; William and Jacqueline Boch, individually; William and Lorraine Walsh, individually; William and Melinda Welch, individually; William and Susan Luther, individually; William B. Hart, Jr., Trustee of the Constance Eaton Personal Residence Trust; William Bailey, Trustee of the William F. Bailey Living Trust;</p>
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1 William Brothers, Trustee of the William C.  
2 Brothers Living Trust;  
3 William Erickson;  
4 William F. Newton and Charlotte R.  
5 Newton, individually as Trustees of the  
6 Newton Family Trust;  
7 William Gilbreth, Trustee of the William J.  
8 Gilbreth Trust;  
9 William Hawksworth;  
10 William Lowes;  
11 William L. Reynolds;

William White, Trustee of the William C.  
White Trust;  
William Whorf;  
Wilmetta Davis;  
Winfried and Carol Boersch, individually;  
Wynn Johnson and Lisa Ayala Johnson,  
individually;  
Yan and Alili Comment, individually;  
Yarrow and Caroline Cheney, individually;  
Yitzhak and Smadar Orlans, individually;  
Yvon and Malinda Chouinard, individually;  
Zobeida Olson

#### Overlying Landowners

11 94. Pursuant to California Civil Procedure Code section 836(d)(1)(A), City will serve  
12 the owners all real property overlying the Watershed's Groundwater Basins ("Overlying  
13 Landowners") with this Third Amended Cross-Complaint and court-approved notice of  
14 adjudication and form answer. Pursuant to California Civil Procedure Code section 836(k), upon  
15 receipt of the requisite notice, Overlying Landowners interested in this proceeding shall have the  
16 duty to appear in this action and become a party if they so choose.

#### Interested Persons

18 95. All Persons Who Own an Interest in Land Adjacent to the Ventura River or Its  
19 Tributaries or in Land Overlying the Ventura River Watershed's Groundwater Basins, and Claim  
20 an Interest to Divert, Pump, Extract or Store Water From, Under or on That Land.  
21

#### Roe Cross-Defendants

22 96. City is informed and believes that:

23 (a) Cross-Defendants Roes 1 through 50 operate wells and/or diversions which  
24 extract surface and/or subsurface water from the Ventura River.  
25

26 (b) Cross-Defendants Roes 51 through 100 operate wells and/or diversions  
27 which extract surface and/or subsurface water from Matilija Creek.  
28

1 (c) Cross-Defendants Roes 101 through 150 operate wells and/or diversions  
2 which extract surface and/or subsurface water from North Fork Matilija Creek.

3 (d) Cross-Defendants Roes 151 through 200 operate wells and/or diversions  
4 which extract surface and/or subsurface water from San Antonio Creek.

5 (e) Cross-Defendants Roes 201 through 250 operate wells and/or diversions  
6 which extract surface and/or subsurface water from Coyote Creek.

7 (f) Cross-Defendants Roes 251 through 300 operate wells and/or diversions  
8 which extract surface and/or subsurface water from Cañada Larga Creek.

9 (g) Cross-Defendants Roes 301 through 350 operate wells and/or diversions  
10 which extract surface and/or subsurface water from Santa Ana Creek.

11 (h) Cross-Defendants Roes 351 through 400 operate wells which extract water  
12 from the Upper Ventura River Groundwater Basin.

13 (i) Cross-Defendants Roes 401 through 450 operate wells which extract water  
14 from the Ojai Valley Groundwater Basin.

15 (j) Cross-Defendants Roes 451 through 500 operate wells which extract water  
16 from the Lower Ventura River Groundwater Basin.

17 (k) Cross-Defendants Roes 501 through 550 operate wells which extract water  
18 from the Upper Ojai Valley Groundwater Basin.

19 (l) Cross-Defendants Roes 551 through 1,000 are the owners, lessees, or other  
20 persons or entities (i) holding or claiming to hold ownership or possessory interests in real  
21 property within the boundaries of the Watershed; (ii) extracting water from the Watershed; (iii)  
22 claiming some right, title, or interest to water located within the Watershed; or (iv) having or  
23 asserting claims adverse to City's rights and claims.

24 97. City is unaware of the true names and capacities of Cross-Defendants Roes 1  
25 through 1,000. When the City becomes aware of their trues names and capacities, it will seek  
26 leave of court to amend this Cross-Complaint accordingly.

## BACKGROUND

98. The Watershed is located in western Ventura County, with a small section located in eastern Santa Barbara County. The City is informed and believes that the Watershed is fan-shaped and covers 226 square miles.

99. The Ventura River and its headwater tributary run through the center of the Watershed along a 33.5 mile stretch from its headwaters in the Transverse Ranges to the Pacific Ocean.

100. The Ventura River and its headwater tributary is fed by several major tributaries, including Matilija Creek, North Fork Matilija Creek, San Antonio Creek, Cañada Larga Creek, and Coyote Creek.

101. Lake Casitas is a man-made reservoir located in the Watershed primarily filled by runoff from Coyote Creek and Santa Ana Creek and water diverted from the Ventura River.

102. The Ventura River consists of five distinct reaches starting upstream from the Pacific Ocean: Reach 1 (Pacific Ocean to Ventura River Estuary), Reach 2 (Ventura River Estuary to Foster Park), Reach 3 (Foster Park to the San Antonio Creek Confluence), Reach 4 (just above the Ventura River's confluence with San Antonio Creek to below the Robles Diversion Facility), and Reach 5 (Robles Diversion Facility to confluence of Matilija Creek and North Folk Matilija Creek).

103. There are four significant groundwater basins in the Watershed:

(a) Upper Ventura River Groundwater Basin (DWR Bulletin 118, Groundwater Basin Number 4-3.01);

(b) Ojai Valley Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-2);

(c) Lower Ventura River Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-3.02); and

(d) Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118 Groundwater Basin Number 4-1)

1 (collectively “Watershed’s Groundwater Basins”). There is a hydrological connection between  
2 the Ventura River and its tributaries and the Watershed’s Groundwater Basins. Three maps of the  
3 Watershed and the Watershed’s Groundwater Basins are attached as **Exhibit A**.

4 104. In its First Amended Complaint and Verified Petition for Writ of Mandate  
5 (“Complaint”), Plaintiff Santa Barbara Channelkeeper (“Channelkeeper”) alleges that City’s use  
6 of the Ventura River water harms the steelhead trout and its critical habitat and exceeds water  
7 quality standards. Channelkeeper also alleges City’s use of water is unreasonable and violates the  
8 public trust doctrine. Channelkeeper further alleges that City’s water rights are subordinate to  
9 upstream riparian and overlying groundwater rights in the Ventura River Watershed.

10 105. City is informed and believes that Cross-Defendants’ use of water from the  
11 Ventura River and the Watershed’s Groundwater Basins reduces the surface and/or subsurface  
12 water flow of the Ventura River.

13 106. City is informed and believes and thereon alleges that there are conflicting claims  
14 of rights to the Watershed and/or its water.

15 107. City is informed and believes and thereon alleges that it has pueblo, prescriptive,  
16 and/or appropriative rights to water in the Watershed. City is a successor to the Mission San  
17 Buenaventura pueblo water right, which gives it a priority to use sufficient water from the  
18 Ventura River Watershed to meet its needs. It has utilized water from the Watershed for more  
19 than five years prior to the filing of this Cross-Complaint. It has used the Watershed and/or its  
20 water for reasonable and beneficial purposes; and it has done so under a claim of right in an  
21 actual, open, notorious, exclusive, continuous, uninterrupted, hostile, adverse use and/or manner  
22 for a period of time of at least five years before filing this Cross-Complaint. City holds pre-1914  
23 appropriative water rights.

24 108. Upon information and belief, each Cross-Defendant claims a right to utilize water  
25 and threatens to increase its taking of water without regard to the City’s rights. Cross-  
26 Defendants’ pumping and/or diversions reduces Watershed groundwater tables and surface flows  
27 and contributes to the deficiency of the Watershed water supply as a whole.

109. Cross-Defendants' continued and increasing extraction and/or diversion of Watershed waters has resulted in, and will result in a diminution, reduction, and impairment of the Watershed's water supply.

110. Cross-Defendants' continued and increasing extraction and/or diversion of Watershed waters has and will deprive the City of its rights to provide water for the public health, welfare, and benefit.

### FIRST CLAIM FOR RELIEF

(Cal. Const. art. X, § 2 - Against All Cross-Defendants)

111. City incorporates by reference the allegations of paragraphs 1 through 110.

112. Water resources in California must be put to reasonable and beneficial use, and parties exercising a right to use water must engage in a reasonable method of use and reasonable method of diversion.

113. City's reasonable and beneficial use of water requires consideration of Channelkeeper's claims and Cross-Defendants' uses and diversions of water from the Ventura River or the Watershed's Groundwater Basins.

114. City's reasonable and beneficial use of water also requires consideration of all other uses and users in the Watershed in the context of Statewide laws favoring domestic use of water; conservation of water; service of safe, clean, affordable, and accessible water; and protection of municipal water rights.

115. Based on those considerations, City's use of water from the Ventura River Watershed as compared to all other uses and users is reasonable and beneficial because:

(a) City's water is used for domestic purposes.

(b) City encourages conservation of water by its users, does not waste water in its operations, and only uses water for municipal purposes.

(c) City provides safe, clean, affordable, and accessible water.

1 (d) City is exercising vested water rights.

2 116. City seeks a preliminary and permanent injunction reducing Cross-Defendants' use  
3 of surface and/or subsurface water and groundwater affecting the surface and/or subsurface flow  
4 of the Ventura River to a level of reasonable and beneficial use and a level that protects public  
5 trust resources after a consideration of all water uses and users in the Watershed pursuant the  
6 Court of Appeal's decision in Santa Barbara Channelkeeper v. City of San Buenaventura (2018)  
7 19 Cal.App.5th 1176, 1192–1193.

8  
9 SECOND CLAIM FOR RELIEF

10 (Public Trust Doctrine - Against All Cross-Defendants)

11  
12 117. City incorporates by reference the allegations of paragraphs 1 through 110.

13 118. The public trust doctrine protects the environmental values of rivers and streams in  
14 California for the benefit of the public, but is subject to parties reasonably exercising their water  
15 rights. Additionally, public trust doctrine uses are limited by the doctrine of reasonable and  
16 beneficial use.

17 119. Evaluating the City's reasonable and beneficial use of water requires consideration  
18 of all other uses and users in the Watershed.

19 120. Evaluating the City's reasonable and beneficial use of water also requires  
20 consideration of Water Code provisions and Statewide laws favoring domestic use of water;  
21 conservation of water; service of safe, clean, affordable, and accessible water; and protection of  
22 municipal water rights and the potential that non-flow related mitigation measures may  
23 reasonably reduce the quantity of water required to protect the environment and public trust  
24 resources.

25 121. Based on those considerations, City's use of water from the Ventura River and  
26 Lake Casitas is reasonable and beneficial because:

27 (a) City's water is used for domestic purposes.  
28

(b) City encourages conservation of water by its users, does not waste water in its operations and only uses water for municipal purposes.

(c) City provides safe, clean, affordable and accessible water.

(d) City is exercising vested water rights.

122. City seeks a preliminary and permanent injunction reducing Cross-Defendants' use of surface and/or subsurface water and groundwater affecting the surface and/or subsurface flow of the Ventura River to a level of reasonable and beneficial use and a level that protects public trust resources after consideration of Channelkeeper's claims.

### THIRD CLAIM FOR RELIEF

(Declaratory Relief - Pueblo and/or Treaty Water Rights -  
Against All Cross-Defendants)

123. City incorporates by reference the allegations of paragraphs 1 through 110.

124. The City, or a portion of it, is located within the boundaries of the former Mission San Buenaventura. The designation of the Mission San Buenaventura and its subsequent secularization led to the creation of a pueblo water right. The City is a successor to the pueblo right which gives it a priority water right to use sufficient water from the Ventura River Watershed to meet its needs.

125. City is located on land that used to be part of Mexico. While that land was part of Mexico, a vested water right was established on it that was subsequently recognized by the United States in the Treaty of Guadalupe-Hidalgo. City is a successor to the Mexican water right, which has a priority over any right established under California law.

126. City contends that each Cross-Defendant's rights to utilize water from the Watershed are subordinate to City's pueblo and/or treaty water rights and to the general welfare of the citizens, inhabitants, and customers within City's jurisdiction.



127. An actual controversy has arisen between City and Cross-Defendants, and each of them. City alleges, on information and belief, that each Cross-Defendant disputes City's contentions, as described in the immediately preceding paragraph.

128. City seeks a judicial determination as to the correctness of its contentions and a finding as to the priority and amount of water it and each Cross-Defendant are entitled to utilize from the Watershed.

#### FOURTH CLAIM FOR RELIEF

(Declaratory Relief - Prescriptive Water Rights -  
Against All Cross-Defendants)

129. City incorporates by reference the allegations of paragraphs 1 through 110.

130. The California Supreme Court has long recognized prescriptive water rights to both surface and groundwater. City alleges that, for more than five years and before the date of this Cross-Complaint, it has utilized water from the Watershed for reasonable and beneficial purposes, and done so under a claim of right in an actual, open, notorious, exclusive, continuous, hostile, and adverse manner. City further alleges that each Cross-Defendant had actual and/or constructive notice of these activities, either of which is sufficient to establish City's prescriptive rights.

131. City contends that each Cross-Defendant's rights to utilize water from the Watershed are subordinate to City's prescriptive rights and to the general welfare of the citizens, inhabitants, and customers within City's jurisdiction.

132. An actual controversy has arisen between City and Cross-Defendants, and each of them. City alleges, on information and belief, that each Cross-Defendant disputes City's contentions, as described in the immediately preceding paragraph.

133. City seeks a judicial determination as to the correctness of its contentions and a finding as to the priority and amount of water it and each Cross-Defendant are entitled to utilize from the Watershed.

FIFTH CLAIM FOR RELIEF

(Declaratory Relief - Appropriative Water Rights -  
Against All Cross-Defendants)

134. City incorporates by reference the allegations of paragraphs 1 through 110.

135. City alleges that, alternatively or in addition to its prescriptive rights, it has priority pre-1914 appropriative rights to utilize water from the Watershed based upon extensive historic and beneficial use of local water in the Ventura River, including local water impounded and collected in Lake Casitas.

136. An actual controversy has arisen between City and Cross-Defendants, and each of them. City alleges, on information and belief, that all Cross-Defendants, and each of them, seek to prevent City from exercising its priority pre-1914 appropriative rights to utilize water from the Watershed.

137. City seeks a judicial determination of the rights of persons and/or entities with overlying, appropriative, and prescriptive rights to utilize water from the Watershed.

SIXTH CLAIM FOR RELIEF

(Cal. Civ. Proc Code §§ 830-852 - Comprehensive Adjudication  
and Physical Solution - Against All Cross-Defendants)

138. City incorporates by reference the allegations of paragraphs 1 through 110.

139. The physical solution doctrine imposes a duty on this Court to resolve competing claims to water by cooperatively satisfying the reasonable and beneficial needs of each user while protecting the substantial enjoyment of their prior rights. A physical solution can achieve this result by: compelling non-flow related improvements for the protection of public trust resources thereby preserving and protecting water supply for domestic use, the highest and best use, and for irrigation use, the next highest and best use (Water Code section 106); augmenting the Watershed's water supply; and imposing other measures. The physical solution is a practical way

1 of fulfilling the mandate of the California Constitution (article X, section 2) that the water  
2 resources of the State be put to use to the fullest extent of which they are capable.

3 140. Further, the Code of Civil Procedure authorizes the comprehensive adjudication of  
4 groundwater rights, including interconnected surface waters, and the imposition of physical  
5 solution. Cal. Civ. Proc. Code §§ 830-852.

6 141. Accordingly, City seeks a physical solution among City and Cross-Defendants  
7 regarding their respective uses of surface and/or subsurface water and groundwater affecting the  
8 Ventura River.

9  
10 SEVENTH CLAIM FOR RELIEF

11 (Declaratory Relief - Municipal Priority - Against All Cross-Defendants)

12  
13 142. City incorporates by reference the allegations of paragraphs 1 through 110.

14 143. City has the right to utilize water from the Watershed to meet existing public water  
15 needs and also to utilize increased amounts of water from the Watershed as necessary to meet  
16 future public needs. City's rights to the Watershed's water exist both as a result of the priority  
17 and extent of its pueblo, appropriative, and prescriptive rights, and as a matter of law and public  
18 policy of the State of California: "It is hereby declared to be the established policy of this State  
19 that the use of water for domestic purposes is the highest use of water and that the next highest  
20 use is for irrigation." Cal. Water Code § 106.

21 144. California Water Code Section 106.5 provides: "It is hereby declared to be the  
22 established policy of this State that the right of a municipality to acquire and hold rights to the use  
23 of water should be protected to the fullest extent necessary for existing and future uses. . . ."

24 145. Under California Water Code Sections 106 and 106.5, City has a prior and  
25 paramount right to Watershed water as against all non-municipal uses.

26 146. An actual controversy has arisen between City and Cross-Defendants. City  
27 alleges, on information and belief, that Cross-Defendants dispute the contentions contained in the  
28 preceding paragraphs of this Cross-Complaint. City is informed and believes, and on that basis

1 alleges, that the certain Cross-Defendants utilize water from the Watershed for non-municipal  
2 purposes.

3 147. City seeks a judicial determination as to the correctness of its contentions and to  
4 the amount of water the parties may utilize from the Watershed. City also seeks a declaration of  
5 its right to utilize water from the Watershed to meet its reasonable present and future needs, and  
6 that such rights are prior and paramount to the rights, if any, of Cross-Defendants to use  
7 Watershed water for non-municipal purposes.

8  
9 EIGHTH CLAIM FOR RELIEF

10 (Declaratory Relief - Human Right to Water - Against All Cross-Defendants)

11  
12 148. City incorporates by reference the allegations of paragraphs 1 through 110.

13 149. City has the right to utilize water from the Watershed to meet existing public water  
14 needs to protect the human right to water and also to utilize increased amounts of water from the  
15 Watershed as necessary to meet future public needs to protect the human right to water. City's  
16 rights to the Watershed's water exist both as a result of the priority and extent of its pueblo,  
17 appropriative, and prescriptive rights, and as a matter of law and public policy of the State of  
18 California: "It is hereby declared to be the established policy of the state that every human being  
19 has the right to safe, clean, affordable, and accessible water adequate for human consumption,  
20 cooking, and sanitary purposes." Cal. Water Code § 106.3.

21 150. Under California Water Code Section 106.3, City has a prior and paramount right  
22 to Watershed water to protect the human right to water.

23 151. An actual controversy has arisen between City and Cross-Defendants. City  
24 alleges, on information and belief, that Cross-Defendants dispute the contentions contained in the  
25 preceding paragraphs of this Cross-Complaint. City is informed and believes, and on that basis  
26 alleges, that the certain Cross-Defendants utilize water from the Watershed for purposes that are  
27 inferior to the paramount human right to water.

(Declaratory Relief - Against All Cross-Defendants)

12 || 154. City contends, and is informed and believes that Cross-Defendants dispute, that:

(b) Cross-Defendants' uses are not reasonable or beneficial and violate the public trust doctrine as compared to City's use of the Ventura River Watershed.

156. City seeks a declaration and judicial determination as to the validity of its  
contentions set forth in this Cross-Complaint.

25 WHEREFORE, City prays for the following relief:

1. For a preliminary and permanent injunction reducing Cross-Defendants' uses of surface water and groundwater affecting the surface and/or subsurface flow of the Ventura River

1 to a level of reasonable and beneficial use and a level that protects public trust resources after  
2 consideration of all water uses and users in the Watershed;

3 2. For a physical solution allocating City's and Cross-Defendants' reasonable and  
4 beneficial use of water affecting the Ventura River Watershed, and protecting the substantial  
5 enjoyment of their water rights;

6 3. For judicial declarations consistent with City's contentions in the Third, Fourth,  
7 Fifth, Seventh, Eighth, and Ninth Claims for Relief in this Cross-Complaint;

8 4. For judgment against all named cross-defendants who fail to appear in this action  
9 that they are bound by the judgment and physical solution, and their water rights in the Ventura  
10 River Watershed, if any, are limited to the terms of the physical solution.

11 5. For judgment against all persons who, presently or in the future, own an interest in  
12 real property adjacent to the Ventura River or its tributaries and who fail to appear in this action  
13 that they are bound by the judgment and physical solution, and their water rights in the Ventura  
14 River or its tributaries, if any, are limited to the terms of the physical solution.

15 6. For judgment against all persons who, presently or in the future, own an interest in  
16 real property overlying the Ventura River Watershed's Groundwater Basins and who fail to  
17 appear in this action that they are bound by the judgment and physical solution, and their water  
18 rights in the Ventura River Watershed's Groundwater Basins, if any, are limited to the terms of  
19 the physical solution.

20 7. For City's costs incurred in this action; and

21 8. For such other and further relief as the Court deems just and proper.

1 Dated: January 2, 2020

BEST BEST & KRIEGER LLP

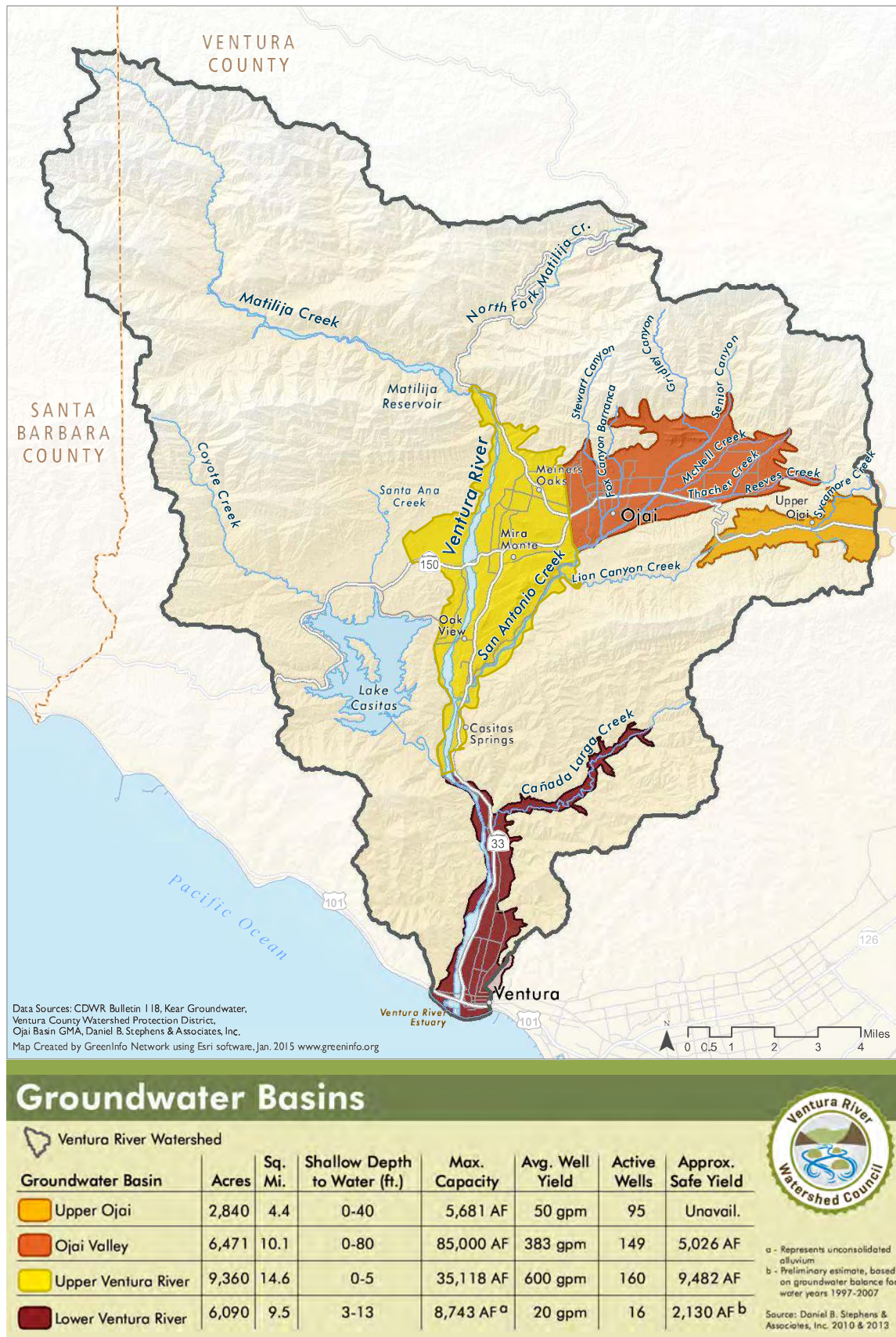
2  
3 By:



4 GENE TANAKA  
5 SHAWN HAGERTY  
6 SARAH CHRISTOPHER FOLEY  
7 DAKOTAH BENJAMIN  
8 Attorneys for Respondent and Cross-  
9 Complainant CITY OF SAN  
10 BUENAVENTURA  
11  
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# EXHIBIT A

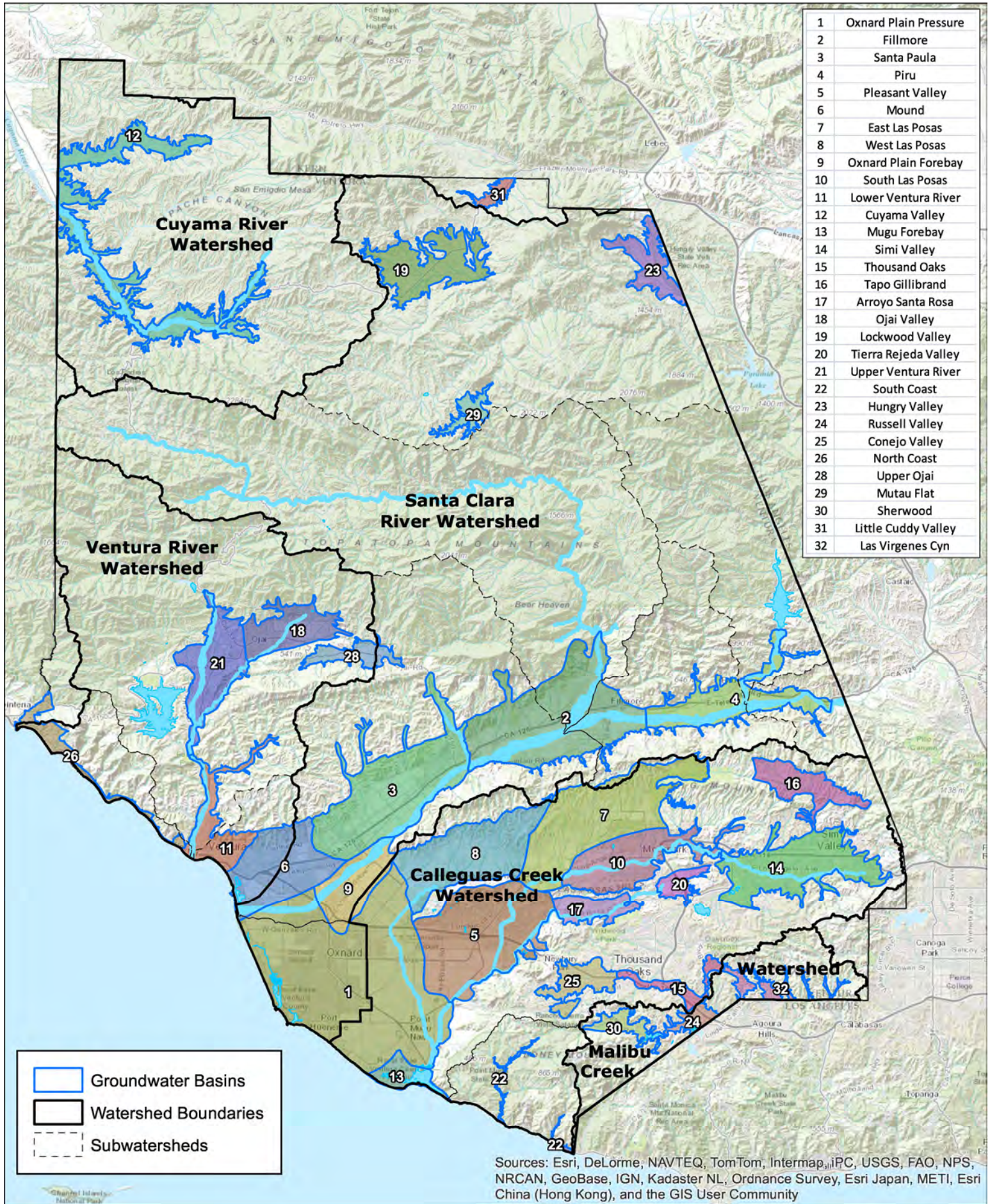




**Figure 3.3.3.2 Groundwater Basins Map**

Data sources: See Table 3.4.2.1.3 Groundwater Basins Map Data Sources in "3.4.2 Water Supplies" for an explanation of the various data in the table.





Ventura County  
Resource Management Agency  
Information Systems Department  
Map created on 04/07/2014



**Figure 3-8**  
**Groundwater Basins**  
**WCVC IRWM Region**

0 2 4 8 Miles

Disclaimer: this map was created by the Ventura County Resource Management Agency, Mapping Services - GIS, which is designed and operated solely for the convenience of the County and related public agencies. The County does not warrant the accuracy of this map and no decision involving a risk of economic loss or physical injury should be made in reliance therein.







Figure 3.3.1.1.1 Drainage Network Map

# Exhibit B

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11 Attorneys for Defendant and Cross-Complainant  
CITY OF SAN BUENAVENTURA, a California  
12 municipal corporation, incorrectly named as CITY  
OF BUENAVENTURA, a California municipal  
13 corporation

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 COUNTY OF SAN FRANCISCO

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

18 Plaintiff and Petitioner,

19 v.

20 STATE WATER RESOURCES  
21 CONTROL BOARD, a California state  
agency;  
22 CITY OF BUENAVENTURA, a  
California municipal corporation,

23 Respondents.

Case No. CPF-14-513875

Exempt from Filing Fees Pursuant to Gov't  
Code § 6103

DEFENDANT AND CROSS-  
COMPLAINANT CITY OF SAN  
BUENAVENTURA, a CALIFORNIA  
MUNICIPAL CORPORATION'S  
(INCORRECTLY NAMED AS CITY OF  
BUENAVENTURA, a CALIFORNIA  
MUNICIPAL CORPORATION), FIRST  
AMENDED CROSS-COMPLAINT FOR:

1. VIOLATION OF REASONABLE USE;
2. VIOLATION OF PUBLIC TRUST;
3. PHYSICAL SOLUTION;
4. DECLARATORY RELIEF;

Action Filed: Sept. 19, 2014  
Trial Date: Not Set

82470.00018\10540541.1

**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*  
**06/11/2015**  
**Clerk of the Court**  
BY: ANNIE PASCUAL  
Deputy Clerk

1 CITY OF SAN BUENAVENTURA, a  
2 California municipal corporation,  
3 incorrectly named as CITY OF  
4 BUENAVENTURA, a California  
5 municipal corporation,

6 Cross-Complainant,

7 v.

8 CASITAS MUNICIPAL WATER  
9 DISTRICT, a California special district;  
10 MEINERS OAKS COUNTY WATER  
11 DISTRICT, a California special district;  
12 VENTURA RIVER COUNTY WATER  
13 DISTRICT, a California special district;  
14 RANCHO MATILJA MUTUAL WATER  
15 COMPANY, a California corporation;  
16 WOOD-CLAEYSSSENS FOUNDATION, a  
17 501(c)(3) organization;  
18 GOLDEN STATE WATER COMPANY; a  
19 California corporation,  
20 SENIOR CANYON MUTUAL WATER  
21 COMPANY, a California corporation; and  
22 DOES 1-400,

23 Cross-Defendants.  
24  
25  
26  
27  
28



1 FIRST AMENDED CROSS-COMPLAINT

2  
3 Cross-Complainant City of San Buenaventura, a California municipal corporation,  
4 incorrectly sued as City of Buenaventura, a California municipal Corporation ("City"), alleges as  
5 follows:  
6

7 PARTIES

8  
9 1. City is a California municipal corporation organized and existing under the laws of  
10 the State of California and located in the County of Ventura ("Ventura County"). The City  
11 operates wells and diversions which extract surface and/or subsurface water from the Ventura  
12 River and takes water deliveries from Lake Casitas.  
13

14 2. Cross-Defendant Casitas Municipal Water District ("Casitas") is a California  
15 special district organized and existing under the laws of the State of California and located in  
16 Ventura County. City is informed and believes that Casitas obtains water from Lake Casitas  
17 which contains water diverted from the Ventura River.  
18

19 3. Cross-Defendant Meiners Oaks County Water District ("Meiners Oaks") is a  
20 California special district organized and existing under the laws of the State of California and  
21 located in Ventura County. City is informed and believes that Meiners Oaks operates wells that  
22 extract surface and/or subsurface water from the Ventura River.  
23

24 4. Cross-Defendant the Ventura River County Water District ("VRWD") is a  
25 California special district organized and existing under the laws of the State of California and  
26 located in Ventura County. City is informed and believes that VRWD operates wells that extract  
27 surface and/or subsurface water from the Ventura River.  
28

1           5.       Cross-Defendant Rancho Matilija Mutual Water Company ("Rancho Matilija") is  
2 a California corporation organized and existing under the laws of the State of California and  
3 doing business as a mutual water company in Ventura County. City is informed and believes that  
4 Rancho Matilija operates wells that extract surface and/or subsurface water from the Ventura  
5 River.

6  
7           6.       City is informed and believes that Cross-Defendant Wood-Claeysens Foundation  
8 ("Foundation") is a 501(c)(3) charitable organization registered in Delaware and doing business  
9 in Ventura County. City is informed and believed that the Foundation operates wells that extract  
10 surface and/or subsurface water from the Ventura River.

11  
12           7.       Cross-Defendant Golden State Water Company ("Golden State") is a California  
13 corporation organized and existing under the laws of the State of California and doing business in  
14 Ventura County. Golden State is a public utility regulated by the California Public Utilities  
15 Commission. City is informed and believes that Golden State operates wells that extract water  
16 from the Ojai Valley Groundwater Basin, affecting outflows from the Ojai Valley Groundwater  
17 Basin to the Ventura River tributary.

18  
19           8.       Cross-Defendant Senior Canyon Mutual Water Company ("Senior Canyon") is a  
20 California corporation organized and existing under the laws of the State of California and doing  
21 business as a mutual water company in Ventura County. City is informed and believes that  
22 Senior Canyon operates wells that extract water from the Ojai Valley Groundwater Basin,  
23 affecting outflows from the Ojai Valley Groundwater Basin to the Ventura River tributary.

24  
25           9.       City is informed and believes that:

26  
27                   (a)     Cross-Defendants Does 1 through 50 operate wells and/or diversions which  
28 extract surface and/or subsurface water from the Ventura River.



1 (b) Cross-Defendants Does 51 through 100 operate wells and/or diversions  
2 which extract surface and/or subsurface water from Matilija Creek.

3 (c) Cross-Defendants Does 101 through 150 operate wells and/or diversions  
4 which extract surface and/or subsurface water from North Fork Matilija Creek.

5 (d) Cross-Defendants Does 151 through 200 operate wells and/or diversions  
6 which extract surface and/or subsurface water from San Antonio Creek.

7 (e) Cross-Defendants Does 201 through 250 operate wells which extract water  
8 from the Upper Ventura River Groundwater Basin.

9 (f) Cross-Defendants Does 251 through 300 operate wells which extract water  
10 from the Ojai Valley Groundwater Basin.

11 (g) Cross-Defendants Does 301 through 350 operate wells which extract water  
12 from the Lower Ventura Groundwater Basin.

13 (h) Cross-Defendants Does 351 through 400 operate wells which extract water  
14 from the Upper Ojai Groundwater Basin.

15  
16 10. City is unaware of the true names and capacities of Cross-Defendants Does 1  
17 through 400. When the City becomes aware of their trues names and capacities, it will seek leave  
18 of court to amend this Cross-Complaint accordingly.

19  
20 BACKGROUND

21  
22 11. The Ventura River Watershed ("Watershed") is located in western Ventura  
23 County, with a small section located in eastern Santa Barbara County. The City is informed and  
24 believes that the Watershed is fan-shaped and covers 226 square miles.

25  
26 12. The Ventura River and its headwater tributary run through the center of the  
27 Watershed along a 33.5 mile stretch from its headwaters in the Transverse Ranges to the Pacific  
28 Ocean.

1           13.     The Ventura River and its headwater tributary is fed by several major tributaries,  
2 including Matilija Creek, North Fork Matilija Creek, San Antonio Creek, Canada Larga Creek  
3 and Coyote Creek.  
4

5           14.     Lake Casitas is a man-made reservoir located in the Watershed filled by runoff  
6 from Coyote Creek and Santa Ana Creek and water diverted from the Ventura River.  
7

8           15.     The Ventura River consists of five distinct reaches starting upstream from the  
9 Pacific Ocean: Reach 1 (Pacific Ocean to Ventura River Estuary), Reach 2 (Ventura River  
10 Estuary to Foster Park), Reach 3 (Foster Park to the San Antonio Creek Confluence), Reach 4  
11 (just above the Ventura River's confluence with San Antonio Creek to below the Robles  
12 Diversion Facility), and Reach 5 (Robles Diversion Facility to confluence of Matilija Creek and  
13 North Folk Matilija Creek).  
14

15           16.     There are four significant groundwater basins in the Watershed: Upper Ventura  
16 River Groundwater Basin, Ojai Valley Groundwater Basin, Lower Ventura River Groundwater  
17 Basin, and Upper Ojai Groundwater Basin (collectively "Watershed's Groundwater Basins").  
18 There is a hydrological connection between the Ventura River and its tributaries and the  
19 Watershed's Groundwater Basins resulting in both inflow and outflow between the surface water  
20 and the groundwater.  
21

22           17.     In its Complaint and Verified Petition for Writ of Mandate ("Complaint"), Plaintiff  
23 Santa Barbara Channelkeeper ("SBCK") alleges that City's use of the Ventura River water harms  
24 the steelhead trout and its critical habitat and exceeds water quality standards. SBCK further  
25 alleges City's use of water is unreasonable and violates the public trust doctrine.  
26

27           18.     City is informed and believes that Cross-Defendants' use of water from the  
28 Ventura River and the Watershed's Groundwater Basins reduces the surface and/or subsurface

1 water flow of the Ventura River.

2  
3 FIRST CLAIM FOR RELIEF

4 (Cal. Const. art. X, §2 - Against All Cross-Defendants)

5  
6 19. City incorporates by reference the allegations of paragraphs 1 – 18.

7  
8 20. Water resources in California must be put to beneficial use, and parties exercising  
9 a right to use water must engage in a reasonable method of use and reasonable method of  
10 diversion.

11  
12 21. City's reasonable and beneficial use of water requires consideration of SBCK's  
13 claims and Cross-Defendants' uses and diversions of water from the Ventura River or the  
14 Watershed's Groundwater Basins.

15  
16 22. City's reasonable and beneficial use of water also requires consideration of  
17 Statewide policies favoring domestic use of water, conservation of water, service of safe, clean,  
18 affordable and accessible water, and protection of municipal water rights.

19  
20 23. Based on those considerations, City's use of water from the Ventura River and  
21 Lake Casitas is reasonable and beneficial because:

- 22  
23 (a) City's water is used for domestic purposes.  
24 (b) City encourages conservation of water by its users, does not waste water in  
25 its operations and only uses water for municipal purposes.  
26 (c) City provides safe, clean, affordable and accessible water.  
27 (d) City is exercising vested water rights.  
28

24. City seeks a preliminary and permanent injunction reducing Cross-Defendants' use of surface and/or subsurface water and groundwater affecting the surface and/or subsurface flow of the Ventura River to a level of reasonable and beneficial use after consideration of SBCK's claims.

## SECOND CLAIM FOR RELIEF

(Public Trust Doctrine -Against All Cross-Defendants)

25. City incorporates by reference the allegations of paragraphs 1 – 18.

26. The public trust doctrine protects the ecology of rivers and streams in California for the benefit of the public, but is subject to parties exercising their right to use water reasonably.

27. City's reasonable and beneficial use of water requires consideration of SBCK's claims and Cross-Defendants' uses and diversions of water from the Ventura River or the Watershed's Groundwater Basins.

28. City's reasonable and beneficial use of water also requires consideration of Statewide policies favoring domestic use of water, conservation of water, service of safe, clean, affordable and accessible water, and protection of municipal water rights.

29. Based on those considerations, City's use of water from the Ventura River and Lake Casitas is reasonable and beneficial because:

(a) City's water is used for domestic purposes.

(b) City encourages conservation of water by its users, does not waste water in its operations and only uses water for municipal purposes.

(c) City provides safe, clean, affordable and accessible water.

1 (d) City is exercising vested water rights.

2  
3 30. City seeks a preliminary and permanent injunction reducing Cross-Defendants' use  
4 of surface and/or subsurface water and groundwater affecting the surface and/or subsurface flow  
5 of the Ventura River to a level of reasonable and beneficial use and a level that protects public  
6 trust resources after consideration of SBCK's claims.

7  
8 THIRD CLAIM FOR RELIEF

9 (Physical Solution – Again All Cross-Defendants)

10  
11 31. City incorporates by reference the allegations of paragraphs 1 – 30.

12  
13 32. The physical solution doctrine authorizes this Court to resolve competing claims to  
14 water by cooperatively satisfying the reasonable and beneficial needs of each user while  
15 protecting the substantial enjoyment of their prior rights. It achieves this result by augmenting  
16 the water supply and other practical measures.

17  
18 33. Accordingly, City seeks a physical solution among City and Cross-Defendants  
19 regarding their respective uses of surface and/or subsurface water and groundwater affecting the  
20 Ventura River.

21  
22 FOURTH CLAIM FOR RELIEF

23 (Declaratory Relief - Against All Cross-Defendants)

24  
25 34. City incorporates by reference the allegations of paragraphs 1 – 30.

26  
27 35. City contends, and is informed and believes that Cross-Defendants dispute, that:  
28

1 (a) After consideration of SBCK's claims, City's use of the Ventura River and  
2 Lake Casitas is reasonable and beneficial and does not violate the public trust doctrine.

3 (b) After consideration of SBCK's claims, Cross-Defendants' uses are not  
4 reasonable or beneficial and violate the public trust doctrine.  
5

6 36. Therefore, an actual, present controversy exists between City and Cross-  
7 Defendants concerning City's and Cross-Defendant's use of surface and/or subsurface water and  
8 groundwater affecting the Ventura River.  
9

10 37. City seeks a declaration and judicial determination as to the validity of its  
11 contentions set forth in this Cross-Complaint.  
12

13 PRAAYER FOR RELIEF  
14

15 WHEREFORE, City prays for the following relief:  
16

17 1. For a preliminary and permanent injunction reducing Cross-Defendants' uses of  
18 surface water and groundwater water affecting the surface and/or subsurface flow of the Ventura  
19 River to a level of reasonable and beneficial use and a level that protects public trust resources  
20 after consideration of SBCK's claims;  
21

22 2. For a physical solution allocating City's and Cross-Defendants' reasonable and  
23 beneficial use of water affecting the Ventura River, and protecting the substantial enjoyment of  
24 their water rights;  
25

26 3. For a declaration that City's use of the Ventura River and Lake Casitas is  
27 reasonable and beneficial and Cross-Defendants' use of surface and/or subsurface water and  
28 groundwater affecting the flow of the Ventura River is not reasonable and beneficial after



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consideration of SBCK's claims;

4. For City's costs incurred in this action;

5. For such other and further relief as the Court deems just and proper.

Dated: June 10, 2015

BEST BEST & KRIEGER LLP

By: /S/ Benjamin Lee  
GENE TANAKA  
SHAWN HAGERTY  
WENDY Y. WANG  
BENJAMIN C. LEE  
Attorneys for Defendant and Cross-  
Complainant CITY OF SAN  
BUENAVENTURA

1 PROOF OF SERVICE

2  
3 I am a resident of the State of California and over the age of eighteen years, and  
4 not a party to the within action; my business address is Best Best & Krieger LLP, 2001 N. Main  
5 St. Suite 390, Walnut Creek, CA 94596. On June 10, 2015, I served the within document(s):

6 SUMMONS ON FIRST AMENDED CROSS-COMPLAINT;

7 DEFENDANT AND CROSS-COMPLAINANT CITY OF SAN  
8 BUENAVENTURA, a CALIFORNIA MUNICIPAL CORPORATION'S  
9 (INCORRECTLY NAMED AS CITY OF BUENAVENTURA, A  
CALIFORNIA MUNICIPAL CORPORATION), FIRSTAMENDED CROSS-  
COMPLAINT FOR:

- 10 1. VIOLATION OF REASONABLE USE;  
11 2. VIOLATION OF PUBLIC TRUST;  
12 3. PHYSICAL SOLUTION;  
13 4. DECLARATORY RELIEF;

14  
15 ☐ by placing the document(s) listed above in a sealed envelope with postage thereon  
16 fully prepaid, in the United States mail at Walnut Creek, California addressed as  
17 set forth below. I am readily familiar with the firm's practice of collection and  
18 processing correspondence for mailing. Under that practice it would be deposited  
with the U.S. Postal Service on that same day with postage thereon fully prepaid in  
the ordinary course of business.

19 ☐ I caused such envelope to be delivered via overnight delivery. Such envelope was  
20 deposited for delivery by United Parcel Service following the firm's ordinary  
business practices.

21 ☒ by transmission via **E-Service to File & Serve Express** to the person(s) set forth  
22 below. Local Rules of Court 2.10 (P).

23 ☐ **By e-mail or electronic transmission.** Based on a court order or an agreement of  
24 the parties to accept service by e-mail or electronic transmission, I caused the  
25 documents to be sent to the persons at the e-mail addresses listed below. I did not  
26 receive, within a reasonable time after the transmission, any electronic message or  
27 other indication that the transmission was unsuccessful.  
28



1 Daniel Cooper  
2 Caroline Koch  
3 Lawyers for Clean Water, Inc.  
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5 San Francisco, CA 94129  
6 Phone: (415) 440-6520  
7 Fax: (415) 440-4155  
8 daniel@lawyersforcleanwater.com  
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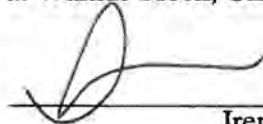
10 Attorneys for Petitioner and Plaintiff  
11 Santa Barbara Channelkeeper

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jonathan.wiener@doj.ca.gov

Attorneys for Respondent and Defendant  
State Water Resources Control Board

12 I declare that I am employed in the office of a member of the bar of this court at  
13 whose direction the service was made.

14 Executed on June 10, 2015 at Walnut Creek, California.



Irene Islas

# Exhibit C

Daniel Cooper (Bar No. 153576)  
Caroline Koch (Bar No. 266068)  
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Email: caroline@lawyersforcleanwater.com

Attorneys for Petitioner  
SANTA BARBARA CHANNELKEEPER

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN FRANCISCO  
SAN FRANCISCO DIVISION

SANTA BARBARA CHANNELKEEPER, a  
California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES CONTROL  
BOARD, a California State Agency;

Respondent,

CITY OF BUENAVENTURA, a California  
municipal corporation,

Defendant.

Case No. CPF-14-513875

**NOTICE OF MOTION; MOTION TO STRIKE  
FIRST AMENDED CROSS-COMPLAINT**

C.C.P. §§ 428.10, 435(b), 436

Date: August 26, 2015

Time: 9:30 a.m.

Dept.: 302

Judge: Hon. Ernest H. Goldsmith

Action Filed: September 19, 2014

Reserv. #: 06240826-08

**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*  
**06/25/2015**  
**Clerk of the Court**  
BY: RONNIE OTERO  
Deputy Clerk

1 **NOTICE OF MOTION**

2 PLEASE TAKE NOTICE that on August 26, 2015, at 9:30 a.m. or as soon thereafter as the  
3 matter may be heard in Department 302 of the Superior Court of the State of California in the County of  
4 San Francisco that Plaintiff and Petitioner Santa Barbara Channelkeeper ("Channelkeeper") will move to  
5 strike Defendant and Cross-Complainant City of San Buenaventura's ("the City") First Amended Cross-  
6 Complaint ("Cross-Complaint") pursuant to California Code of Civil Procedure sections 428.10, 435(b),  
7 and 436.

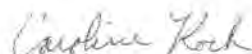
8 This motion is based on this Notice of Motion; the Motion to Strike; the Points and Authorities  
9 in support thereof; the Declaration of Caroline Koch in Support of Motion to Strike; and on oral  
10 argument that may be presented at the hearing.

11 The court follows the tentative ruling procedure set out in California Rule of Court 3.1308(a)(1).  
12 Any tentative or notice to appear will generally be available by 3:00 p.m. the court day before the  
13 hearing. Unless the Court directs otherwise, the Court's tentative ruling will be available on the Court's  
14 website at <http://webapps.sftc.org/tr/tr.dll/?RulingID=2> or by calling (415) 551-4000. The tentative  
15 ruling may become the ruling of the court unless it is contested. If a party wishes to contest the tentative  
16 ruling, the party must notify the Court and all the other parties no later than 4:00 p.m. one court day  
17 before the scheduled hearing and briefly identify the issues it wishes to argue. If leaving a telephone  
18 message, also give your name and telephone number, the case name and number, and date and time of  
19 the hearing.

20 Whenever a tentative ruling has not been issued, the parties are to appear at the hearing unless  
21 otherwise ordered.

22  
23 Dated: June 25, 2015

Respectfully Submitted,

24  
25 

26 Caroline Koch, Esq.  
27 Lawyers for Clean Water, Inc.  
28 Attorneys for Santa Barbara Channelkeeper

1 **MOTION TO STRIKE**

2 Channelkeeper hereby moves the Court to strike each of the causes of action alleged in the  
3 Cross-Complaint as those causes of action are irrelevant to Channelkeeper's causes of action alleged in  
4 its complaint and writ petition and thereby fails to satisfy the requirements of California Code of Civil  
5 Procedure section 428.10(b).

6 This motion is based on this Notice of Motion; the Motion to Strike; the Points and Authorities  
7 in support thereof; the Declaration of Caroline Koch in Support of Motion to Strike; and on oral  
8 argument that may be presented at the hearing.

9 Channelkeeper moves to strike the Cross-Complaint in its entirety because it is not filed in  
10 conformity with the laws of this state. Specifically, the Cross-Complaint fails to meet the requirements  
11 of California Code of Civil Procedure section 428.10(b) for joinder of third parties.

12 In addition, as detailed below, Channelkeeper moves to strike matters irrelevant to  
13 Channelkeeper's complaint and writ petition that are alleged in the Cross-Complaint.

14 Channelkeeper moves to strike paragraph 2 of the Cross-Complaint on the following grounds:

- 15 1. Allegation against Cross-Defendant Casitas Municipal Water District do arise out of the  
16 same transaction, occurrence, or series of transaction or occurrences that are the subject of  
17 Channelkeeper's complaint and writ petition;  
18 2. Allegation against Cross-Defendant Casitas Municipal Water District do not assert a claim,  
19 right, or interest in the property or controversy which is the subject of Channelkeeper's  
20 complaint and writ petition;  
21 3. Addition of Cross-Defendant Casitas Municipal Water District to Channelkeeper's action  
22 will not serve the purposes of permissive joinder.

23 For each of these reasons paragraph 2 of the Cross-Complaint is irrelevant to the causes of action  
24 alleged in Channelkeeper's complaint and writ petition and is properly stricken.

25 Channelkeeper moves to strike paragraph 3 of the Cross-Complaint on the following grounds:

- 26 1. Allegation against Cross-Defendant Meiners Oaks County Water District do arise out of the  
27 same transaction, occurrence, or series of transaction or occurrences that are the subject of  
28 Channelkeeper's complaint and writ petition;

1           2. Allegation against Cross-Defendant Meiners Oaks County Water District do not assert a  
2           claim, right, or interest in the property or controversy which is the subject of  
3           Channelkeeper's complaint and writ petition;

4           3. Addition of Cross-Defendant Meiners Oaks County Water District to Channelkeeper's action  
5           will not serve the purposes of permissive joinder.

6 For each of these reasons paragraph 3 of the Cross-Complaint is irrelevant to the causes of action  
7 alleged in Channelkeeper's complaint and writ petition and is properly stricken.

8           Channelkeeper moves to strike paragraph 4 of the Cross-Complaint on the following grounds:

9           1. Allegation against Cross-Defendant Ventura River County Water District do arise out of the  
10           same transaction, occurrence, or series of transaction or occurrences that are the subject of  
11           Channelkeeper's complaint and writ petition;

12           2. Allegation against Cross-Defendant Ventura River County Water District do not assert a  
13           claim, right, or interest in the property or controversy which is the subject of  
14           Channelkeeper's complaint and writ petition;

15           3. Addition of Cross-Defendant Ventura River County Water District to Channelkeeper's action  
16           will not serve the purposes of permissive joinder.

17 For each of these reasons paragraph 4 of the Cross-Complaint is irrelevant to the causes of action  
18 alleged in Channelkeeper's complaint and writ petition and is properly stricken.

19           Channelkeeper moves to strike paragraph 5 of the Cross-Complaint on the following grounds:

20           1. Allegation against Cross-Defendant Rancho Matilija Mutual Water Company do arise out of  
21           the same transaction, occurrence, or series of transaction or occurrences that are the subject  
22           of Channelkeeper's complaint and writ petition;

23           2. Allegation against Cross-Defendant Rancho Matilija Mutual Water Company do not assert a  
24           claim, right, or interest in the property or controversy which is the subject of  
25           Channelkeeper's complaint and writ petition;

26           3. Addition of Cross-Defendant Rancho Matilija Mutual Water Company to Channelkeeper's  
27           action will not serve the purposes of permissive joinder.

28 For each of these reasons paragraph 5 of the Cross-Complaint is irrelevant to the causes of action



1 alleged in Channelkeeper's complaint and writ petition and is properly stricken.

2 Channelkeeper moves to strike paragraph 6 of the Cross-Complaint on the following grounds:

- 3 1. Allegation against Cross-Defendant Wood-Claeyssens Foundation do arise out of the same  
4 transaction, occurrence, or series of transaction or occurrences that are the subject of  
5 Channelkeeper's complaint and writ petition;
- 6 2. Allegation against Cross-Defendant Wood-Claeyssens Foundation do not assert a claim,  
7 right, or interest in the property or controversy which is the subject of Channelkeeper's  
8 complaint and writ petition;
- 9 3. Addition of Cross-Defendant Wood-Claeyssens Foundation to Channelkeeper's action will  
10 not serve the purposes of permissive joinder.

11 For each of these reasons paragraph 6 of the Cross-Complaint is irrelevant to the causes of action  
12 alleged in Channelkeeper's complaint and writ petition and is properly stricken.

13 Channelkeeper moves to strike paragraph 7 of the Cross-Complaint on the following grounds:

- 14 1. Allegation against Cross-Defendant Golden State Water Company do arise out of the same  
15 transaction, occurrence, or series of transaction or occurrences that are the subject of  
16 Channelkeeper's complaint and writ petition;
- 17 2. Allegation against Cross-Defendant Golden State Water Company do not assert a claim,  
18 right, or interest in the property or controversy which is the subject of Channelkeeper's  
19 complaint and writ petition;
- 20 3. Addition of Cross-Defendant Golden State Water Company to Channelkeeper's action will  
21 not serve the purposes of permissive joinder.

22 For each of these reasons paragraph 7 of the Cross-Complaint is irrelevant to the causes of action  
23 alleged in Channelkeeper's complaint and writ petition and is properly stricken.

24 Channelkeeper moves to strike paragraph 8 of the Cross-Complaint on the following grounds:

- 25 1. Allegation against Cross-Defendant Senior Canyon Mutual Water Company do arise out of  
26 the same transaction, occurrence, or series of transaction or occurrences that are the subject  
27 of Channelkeeper's complaint and writ petition;
- 28 2. Allegation against Cross-Defendant Senior Canyon Mutual Water Company do not assert a

claim, right, or interest in the property or controversy which is the subject of  
Channelkeeper's complaint and writ petition;

3. Addition of Cross-Defendant Senior Canyon Mutual Water Company to Channelkeeper's action will not serve the purposes of permissive joinder.

For each of these reasons paragraph 8 of the Cross-Complaint is irrelevant to the causes of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

Channelkeeper moves to strike paragraph 9 of the Cross-Complaint on the following grounds:

1. Allegation against Cross-Defendants Does 1-400 do arise out of the same transaction, occurrence, or series of transaction or occurrences that are the subject of Channelkeeper's complaint and writ petition;
2. Allegation against Cross-Defendants Does 1-400 do not assert a claim, right, or interest in the property or controversy which is the subject of Channelkeeper's complaint and writ petition;
3. Addition of Cross-Defendants Does 1-400 to Channelkeeper's action will not serve the purposes of permissive joinder.

For each of these reasons paragraph 9 of the Cross-Complaint is irrelevant to the causes of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

Channelkeeper moves to strike paragraph 18 of the Cross-Complaint on the following grounds:

1. Cross-Defendants' water uses do arise out of the same transaction, occurrence, or series of transaction or occurrences that are the subject of Channelkeeper's complaint and writ petition;
2. Cross-Defendants' water uses do not assert a claim, right, or interest in the property or controversy which is the subject of Channelkeeper's complaint and writ petition;
3. Resolution of the causes of action based on paragraph 18 together with Channelkeeper's action will not serve the purposes of permissive joinder.

Channelkeeper moves to strike the City's First Claim for Relief (Cross-Complaint at ¶¶ 19-24) alleged in the Cross-Complaint on the following grounds:

1. The First Claim for Relief does not arise out of the same transaction, occurrence, or series of transaction or occurrences that are the subject of Channelkeeper's complaint and writ



petition;

2. The First Claim for Relief does not assert a claim, right, or interest in the property or controversy which is the subject of Channelkeeper's complaint and writ petition;

3. Addition of the First Claim for Relief to Channelkeeper's action will not serve the purposes of permissive joinder.

For each of these reasons the First Claim for Relief alleged in the Cross-Complaint is irrelevant to the causes of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

Channelkeeper moves to strike the City's Second Claim for Relief (Cross-Complaint at ¶¶ 25-30) alleged in the Cross-Complaint on the following grounds:

1. The Second Claim for Relief does not arise out of the same transaction, occurrence, or series of transaction or occurrences that are the subject of Channelkeeper's complaint and writ petition;

2. The Second Claim for Relief does not assert a claim, right, or interest in the property or controversy which is the subject of Channelkeeper's complaint and writ petition;

3. Addition of the Second Claim for Relief to Channelkeeper's action will not serve the purposes of permissive joinder.

For each of these reasons the Second Claim for Relief alleged in the Cross-Complaint is irrelevant to the causes of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

Channelkeeper moves to strike the City's Third Claim for Relief (Cross-Complaint at ¶¶ 31-33) alleged in the Cross-Complaint on the following grounds:

1. The Third Claim for Relief does not arise out of the same transaction, occurrence, or series of transaction or occurrences that are the subject of Channelkeeper's complaint and writ petition;

2. The Third Claim for Relief does not assert a claim, right, or interest in the property or controversy which is the subject of Channelkeeper's complaint and writ petition;

3. Addition of the Third Claim for Relief to Channelkeeper's action will not serve the purposes of permissive joinder.

For each of these reasons the Third Claim for Relief alleged in the Cross-Complaint is irrelevant to the

1 causes of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

2 Channelkeeper moves to strike the City's Fourth Claim for Relief (Cross-Complaint at ¶¶ 34-37)  
3 alleged in the Cross-Complaint on the following grounds:

- 4 1. The Fourth Claim for Relief does not arise out of the same transaction, occurrence, or  
5 series of transaction or occurrences that are the subject of Channelkeeper's complaint and  
6 writ petition;
- 7 2. The Fourth Claim for Relief does not assert a claim, right, or interest in the property or  
8 controversy which is the subject of Channelkeeper's complaint and writ petition;
- 9 3. Addition of the Fourth Claim for Relief to Channelkeeper's action will not serve the  
10 purposes of permissive joinder.

11 For each of these reasons the Fourth Claim for Relief alleged in the Cross-Complaint is irrelevant to the  
12 causes of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

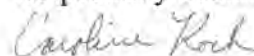
13 Channelkeeper moves to strike the City's Prayer for Relief (Cross-Complaint, Prayer for Relief  
14 at ¶¶ 1-5) alleged in the Cross-Complaint on the following grounds:

- 15 1. The Prayer for Relief does not arise out of the same transaction, occurrence, or series of  
16 transaction or occurrences that are the subject of Channelkeeper's complaint and writ  
17 petition;
- 18 2. The Prayer for Relief does not assert a claim, right, or interest in the property or  
19 controversy which is the subject of Channelkeeper's complaint and writ petition;
- 20 3. Resolution of the remedies sought in the Prayer for Relief together with Channelkeeper's  
21 action will not serve the purposes of permissive joinder.

22 For each of these reasons the Prayer for Relief alleged in the Cross-Complaint is irrelevant to the causes  
23 of action alleged in Channelkeeper's complaint and writ petition and is properly stricken.

24  
25 Dated: June 25, 2015

Respectfully Submitted,



Caroline Koch, Esq.  
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# Exhibit D

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SANTA BARBARA CHANNELKEEPER

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN FRANCISCO  
SAN FRANCISCO DIVISION

SANTA BARBARA CHANNELKEEPER, a  
California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES CONTROL  
BOARD, a California State Agency;

Respondent,

CITY OF BUENAVENTURA, a California  
municipal corporation,

Defendant.

Case No. CPF-14-513875

**POINTS AND AUTHORITIES IN SUPPORT  
OF SANTA BARBARA  
CHANNELKEEPER'S MOTION TO STRIKE  
FIRST AMENDED CROSS-COMPLAINT**

Date: August 26, 2015  
Time: 9:30 a.m.  
Dept.: 302  
Judge: Hon. Ernest H. Goldsmith  
Action Filed: September 19, 2014  
Reserv. #: 06240826-08

**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*  
**06/25/2015**  
**Clerk of the Court**  
BY: RONNIE OTERO  
Deputy Clerk

1 Plaintiff and Petitioner Santa Barbara Channelkeeper (“Channelkeeper”) hereby submits its  
2 Points and Authorities in Support of its Motion to Strike the City of San Buenaventura’s (“the City”)  
3 First Amended Cross-Complaint (“Cross-Complaint”).

4 **I. INTRODUCTION**

5 The facts alleged in Channelkeeper’s complaint and writ petition pertain solely to the *City’s*  
6 unreasonable use of Reach 4 of the Ventura River (“River”) from April through October. Based on this  
7 limited transaction, Channelkeeper asks only that the Court issue a declaratory judgment finding that the  
8 City’s use is unreasonable, and a writ of mandate to compel the State Water Resources Control Board  
9 (“State Board”) to prevent that unreasonable use and consider the resulting impacts to public trust  
10 resources. Yet, via its allegations in the Cross-Complaint, the City attempts to join over 400 competing  
11 water rights holders on the entirety of the River, Lake Casitas, the Ojai Valley Groundwater Basin,  
12 Matilija Creek, the North Fork of Matilija Creek, San Antonio Creek, the Upper Ventura River  
13 Groundwater Basin, the Lower Ventura Groundwater Basin, and the Upper Ojai Groundwater Basin.  
14 Thus the transactions at issue in the Cross-Complaint relate to each water right holder’s uses of each of  
15 these surface and ground waters. As its remedies, the City asks that the Court determine the amount of  
16 water each user may reasonably and beneficially divert. Because the causes of action alleged in the  
17 Cross-Complaint do not arise out of the same transaction or occurrence, or series of transactions or  
18 occurrences, at issue in Channelkeeper’s complaint and writ petition, the City may not join the 400-plus  
19 competing water users.

20 Similarly, the City’s attempt to join other water users fails because there are no claims, interests,  
21 or rights to property at issue in Channelkeeper’s complaint and writ petition. Channelkeeper’s causes of  
22 action address the City’s unreasonable use of the River. No water right holder has a property right to an  
23 unreasonable use of the State’s waters. Nor does the Cross-Complaint allege causes of action that assert  
24 claims, interests, or rights in the controversy raised by Channelkeeper’s complaint and writ petition—  
25 Channelkeeper’s controversy is with the City and the State Board only. And the City’s controversy is  
26 with its competing water users only.

27 In any event, joinder of the causes of action alleged in the Cross-Complaint with the causes of  
28 action raised in Channelkeeper’s complaint and writ petition would in no way serve the purposes of

1 permissive joinder. In other words, adjudicating more than 400 water rights will not avoid a multiplicity  
2 of suits, but will, instead, needlessly complicate and delay resolution of Channelkeeper's action.

3 For each of these reasons, the Cross-Complaint is not filed in conformity with California's  
4 joinder rules, and the causes of action alleged in the Cross-Complaint are irrelevant to Channelkeeper's  
5 complaint and writ and are properly stricken.

## 6 **II. STATEMENT OF FACTS AND PROCEDURAL HISTORY**

### 7 **A. Santa Barbara Channelkeeper's Complaint and Writ Petition.**

8 Channelkeeper's mission is to protect and restore the Santa Barbara Channel and its tributaries,  
9 including the River, for the benefit of its ecosystems and the surrounding human communities. (Verified  
10 Petition for Writ of Mandate ("Pet.") at ¶ 5.) In furtherance of this mission, Channelkeeper filed its  
11 present complaint and writ petition to prevent the City's ongoing unreasonable use of the River, and to  
12 compel the State Board to prevent the City's ongoing unreasonable use of the River. (*See, e.g.*, Pet. at  
13 ¶¶ 1-2.)

14 Specifically, Channelkeeper requests focused relief: (1) a judgment declaring that the City's use  
15 of Reach 4 of the River from April through October is unreasonable in violation of Article X, section 2  
16 of the California Constitution, (2) a writ of mandate compelling the State Board to perform its  
17 mandatory duties to prevent unreasonable use of the State's waters by conducting an analysis of the  
18 City's pumping and diversion of water from Reach 4 of the River based on existing conditions in the  
19 River, and to consider impacts to public trust resources resulting from the City's use of Reach 4, as  
20 required by Article X, section 2 of the California Constitution, section 275 of the Water Code, and the  
21 Public Trust Doctrine, and/or (3) a writ of mandate enjoining the State Board from further abuse of  
22 discretion in failing to conduct an analysis of the reasonableness of the City's use of Reach 4 of the  
23 River. (Pet. at ¶¶ 1-2.)

### 24 **B. The City's Cross-Complaint.**

25 The City's Cross-Complaint alleges four claims for relief against seven named cross-defendants  
26 and Does 1-400. (*See* Cross-Complaint at ¶¶ 1-10, 19-37.) The City's requested relief is: (1) a  
27 preliminary and permanent injunction reducing the 400 plus cross-defendants' use of surface and/or  
28 subsurface water and groundwater affecting the surface and/or subsurface flow of the River to a level of



1 reasonable and beneficial use after consideration of Channelkeeper's claims, (2) a preliminary and  
2 permanent injunction reducing 400 plus cross-defendants' use of surface and/or subsurface water and  
3 groundwater affecting the surface and/or subsurface flow of the Ventura River to a level of reasonable  
4 and beneficial use and a level that protects public trust resources after consideration of Channelkeeper's  
5 claims, (3) a physical solution among the City and the 400 plus cross-defendants, and (4) a declaration  
6 and judicial determination as to the validity of the contentions set forth in the Cross-Complaint after  
7 consideration of Channelkeeper's claims. (Cross-Complaint at ¶¶ 24, 30, 33, 35-37.)

8 The seven named cross-defendants are water rights holders that divert water along the entirety of  
9 the River, as well as from the Ojai Valley Groundwater Basin. (Cross-Complaint at ¶¶ 1-8.) Does 1-400  
10 are alleged to operate wells and/or diversions on Matilija Creek, North Fork Matilija Creek, San Antonio  
11 Creek, the Upper Ventura River Groundwater Basin, the Lower Ventura Groundwater Basin, and the  
12 Upper Ojai Groundwater Basin. (Cross-Complaint at ¶¶ 9-10.) The City states that the Court can address  
13 its claims "after consideration" of Channelkeeper's claims. (*See* Cross-Complaint at ¶¶ 24, 30.)

### 14 **III. STATEMENT OF THE LAW**

#### 15 **A. Cross-Complaint.**

16 "A party against whom a cause of action has been asserted in a complaint or cross-complaint  
17 may file a cross-complaint setting forth either or both of the following:

18 (a) Any cause of action he has against any of the parties who filed the complaint or cross-  
19 complaint against him. [ ]

20 (b) Any cause of action he has against a person alleged to be liable thereon, whether or not such  
21 person is already a party to the action, if the cause of action asserted in his cross-complaint (1) arises out  
22 of the same transaction, occurrence, or series of transactions or occurrences as the cause brought against  
23 him or (2) asserts a claim, right, or interest in the property or controversy which is the subject of the  
24 cause brought against him." (C.C.P. § 428.10.)

#### 25 **B. Motion to Strike a Cross-Complaint.**

26 California Code of Civil Procedure section 435(b) provides, "Any party, within the time allowed  
27 to respond to a pleading may serve and file a notice of motion to strike the whole or any part thereof, but  
28 this time limitation shall not apply to motions specified in subdivision (e)." (C.C.P. § 435(b)(1).)

1 “The court may, upon a motion made pursuant to Section 435, or at any time in its discretion,  
2 and upon terms it deems proper:

3 (a) Strike out any irrelevant, false, or improper matter inserted in any pleading. [or]

4 (b) Strike out all or any part of any pleading not drawn or filed in conformity with the laws of  
5 this state, a court rule, or an order of the court.” (C.C.P. § 436.)

6 **IV. ARGUMENT**

7 The City’s Cross-Complaint is properly stricken, as it fails to meet the standard for joinder under  
8 section 428.10(b) and includes allegations irrelevant to Channelkeeper’s complaint and writ petition.

9 The causes of action alleged in the Cross-Complaint aimed at more than 400 water rights holders do not  
10 arise out of the transaction at issue in Channelkeeper’s complaint and writ petition. Further, the City’s  
11 Cross-Complaint does not, and cannot, allege causes of action pertaining to a claim, right, or interest in  
12 the property or controversy at issue in Channelkeeper’s complaint and writ petition because  
13 Channelkeeper’s action raises no property rights disputes, and the controversy concerns only the City’s  
14 use of one limited reach of the River. Finally, the joining of causes of action alleged against the cross-  
15 defendants would be inconsistent with the purpose of permissive joinder.

16 **A. The Causes of Action Alleged in the Cross-Complaint Do Not Arise out of the Same**  
17 **Transaction, Occurrence, or Series of Transactions or Occurrences at Issue in**  
18 **Channelkeeper’s Complaint and Writ Petition.**

19 Channelkeeper’s complaint and writ petition is focused solely on the *City’s* unreasonable use of  
20 the River. Thus the causes of action alleged in the Cross-Complaint in no way arise out of the same  
21 transaction or occurrence, or series of transaction or occurrences, at issue in Channelkeeper’s complaint  
22 and writ petition.

23 A party may join a third party via a cross-complaint if the causes of action asserted in the cross-  
24 complaint arise out of the same transaction, occurrence, or series of transactions or occurrences as the  
25 causes of action alleged against that party in the complaint. (*See* C.C.P. § 428.10(b)(1).) To determine  
26 whether causes of action arise out of the same transaction, occurrence, or series of transaction and  
27 occurrences, courts ask whether the claims are logically interrelated. (*See Align Technology, Inc. v. Tran*  
28



1 (2009) 179 Cal.App.4th 949, 961 (discussing definition of “transaction”).<sup>1</sup>

2 Channelkeeper’s causes of action are not part of the same transaction or occurrence as the causes  
3 of action the City alleges against the third party cross-defendants, as those causes of action are not  
4 interrelated. The “transaction” of Channelkeeper’s complaint and writ petition is the City’s unreasonable  
5 use of the River. Specifically, Channelkeeper’s allegations relate only to the City’s unreasonable  
6 pumping and diversions from a limited stretch of the River—Reach 4—from April through October.  
7 (See Pet. at ¶¶ 1, 105-128, 129-134, 140-144.) Channelkeeper only seeks remedies related to this narrow  
8 transaction. (See Pet. at ¶¶ 145-176.) To determine that the City’s use of the River is unreasonable and  
9 that the State Board must act the Court need not review other specific uses. (*Joslin v. Marin Mun. Water*  
10 *Dist.* (1967) 67 Cal.2d 132, 140-41; *Tulare Irrigation Dist. v. Lindsay-Strathmore Dist.* (1935) 3 Cal.2d  
11 489, 567; see also *Imperial Irrigation Dist. v. State Water Res. Control Bd.* (1990) 225 Cal.App.3d 548,  
12 568-69) (explaining that competing water users need not be included in an action to determine the  
13 reasonableness of a single user’s exercise of its water right); *Light v. State Water Res. Control Bd.*  
14 (2014) 226 Cal.App.4th 1463, 1479-81 (internal citations omitted); *Carrancho v. Cal. Air Res. Control*  
15 *Bd.* (2003) 111 Cal.App.4th 1255, 1266; see also Sec. IV.B.2., below.)

16 In contrast, the factual allegations in the Cross-Complaint relate to the amounts of surface and  
17 ground water that can be diverted between competing water users. (See Cross-Complaint at ¶¶ 1-9, 18.)  
18 Based on these alleged facts, the City asks that the Court issue preliminary and permanent injunctions  
19 reducing the 400-plus cross-defendants’ uses of the River, Lake Casitas, Matilija Creek, North Fork  
20 Matilija Creek, San Antonio Creek, the Upper Ventura River Groundwater Basin, the Lower Ventura  
21 Groundwater Basin, and the Upper Ojai Groundwater Basin, and for a physical solution among the City  
22 and the cross-defendants. (See Cross-Complaint at ¶¶ 24, 30, 33, 35-37.) To resolve the questions raised  
23 by the Cross-Complaint the Court will determine the amounts of water each user is entitled to divert  
24 based on their respective water rights. (See, e.g., *City of Barstow v. Mojave Water Agency* (2000) 23

25  
26 <sup>1</sup> While the court in *Align Technology, Inc. v. Tran* considered the definition of transaction or occurrence  
27 in the context of a compulsory cross-complaint, section 428.10(b)(1) uses the same statutory language.  
28 “When the same word appears in different places within a statutory scheme, courts generally presume  
the Legislature intended the word to have the same meaning each time it is used.” (*People v. Gray*  
(2014) 58 Cal.4th 901, 906 (internal citations omitted).)

1 Cal.4th 1224, 1249-50.) Channelkeeper's complaint and writ does not implicate these legal issues. (See  
2 Pet. at ¶¶ 1-2, 145-176.)

3 Comparison of the City's Cross-Complaint with the cross-complaint at issue in *Roylance v.*  
4 *Doelger* demonstrates that the causes of action alleged in the Cross-Complaint do not arise out of the  
5 same transaction. In *Roylance v. Doelger*, the cross-complaint was based on the discrete facts of the  
6 same transaction at issue in the complaint—what caused a property to collapse—and the cross-plaintiff  
7 requested the same amount of monetary relief sought in the complaint from cross-defendants. (*Roylance*  
8 *v. Doelger* (1962) 57 Cal.2d 255, 257-58.) The Supreme Court reasoned that the cross-complaint was  
9 proper because the complaint and cross-complaint presented a single set of facts. (*Id.* at 259-261.) Here,  
10 the facts alleged in the Cross-Complaint are in no way the same as those at issue in Channelkeeper's  
11 complaint and writ petition. Nor does the City seek the same relief as Channelkeeper.

12 Similarly, the City's Cross-Complaint is not analogous to cross-complaints brought against third  
13 parties in most circumstances, which typically seek indemnification. (See, e.g., *Am. Motorcycle Ass'n v.*  
14 *Superior Court* (1978) 20 Cal.3d 578, 605-606.) The City does not seek indemnity from the cross-  
15 defendants. Nor is Channelkeeper a water right holder against whom the cross-defendants might have  
16 claims.

17 Because the causes of action alleged in the Cross-Complaint do not arise out of the same  
18 transaction or occurrence, or series of transaction or occurrences, raised in Channelkeeper's complaint  
19 and writ petition, those causes of action are not properly joined via section 428.10(b)(1).

20 **B. The City's Attempt To Join Other Water Users Fails Because There Are No Claims,**  
21 **Interests, or Rights To Property At Issue In Channelkeeper's Complaint And Writ**  
22 **Petition and the Controversy Raised in Channelkeeper's Action is Between**  
**Channelkeeper, the City, and the State Board Only.**

23 A party may join a third party by cross-complaint where a cause of action alleged in the cross-  
24 complaint "asserts a claim, right, or interest in the property or controversy which is the subject of the  
25 case brought against him." (C.C.P. § 428.10(b)(2).) Because Channelkeeper's action implicates no  
26 property rights about which the Cross-Complaint could allege any claims, interests, or rights, and given  
27 that the controversy raised in Channelkeeper's complaint and writ petition is between Channelkeeper,  
28 the City, and the State Board only, the City's Cross-Complaint fails to satisfy the requirements of

1 section 428.10(b)(2).

2 **1. There is no Property Right at Issue in Channelkeeper's Complaint and Writ Petition.**

3 Cases allowing cross-complaints under section 428.10(b)(2) are based on claims involving actual  
4 property rights. (*See, e.g., Roylance*, 57 Cal.2d at 257 (cross-complaint relating to interests in real  
5 property); *see also Dep't of Public Works v. Clausen* (1967) 248 Cal.App.2d 770, 782-84 (cross-  
6 complaint regarding trespass to land).)

7 Here, however, there is no property right at issue. A water user cannot acquire a vested right to  
8 the unreasonable use of water. (*In re Waters of Long Valley Creek Stream Sys.* (1979) 25 Cal.3d 339,  
9 354 (holding that "there can no longer be any property right in the unreasonable use of water"); *see also*  
10 *Joslin*, 67 Cal.2d at 144-45; *Light*, 226 Cal.App.4th at 1488-89 ("No party can acquire a vested right to  
11 appropriate water in a manner harmful to public trust interests, and the state has an affirmative duty to  
12 take the public trust into account in regulating water use by protecting public trust uses whenever  
13 feasible.") (internal citation omitted).) A water right holder's water use is properly involuntarily  
14 curtailed based on the unreasonableness of the use. (*See, e.g., Joslin*, 67 Cal.2d at 140-45.) No  
15 compensation for such curtailment is required. (*Id.* at 145 ("since there was and is no property right in an  
16 unreasonable use there has been no taking or damaging of property by the deprivation of such use and,  
17 accordingly, the deprivation is not compensable").) Accordingly, as Channelkeeper's complaint and writ  
18 petition is aimed at addressing the City's unreasonable use of the River and compelling the State Board  
19 to act on its mandatory duties, the Cross-Complaint cannot assert a claim, right or interest in property  
20 pursuant to section 428.10(b)(2).

21 **2. The Controversy Raised by Channelkeeper's Complaint and Writ Petition is Between**  
22 **Channelkeeper, the City, and the State Board Only.**

23 The City's Cross-Complaint does not assert a claim, right or interest in the controversy raised by  
24 Channelkeeper's complaint and writ petition because the controversy is between Channelkeeper, the  
25 City, and the State Board only. While the Cross-Complaint alleges that the "City's reasonable and  
26 beneficial use of water requires consideration of [Channelkeeper's] claims and Cross-Defendants' use  
27 and diversions of water from the Ventura River or the Watershed's Groundwater Basins," (*see Cross-*  
28 *Complaint at ¶¶ 21, 27*), the City is simply wrong.

1 Specifically, whether the City's use of the River is unreasonable does not depend on other  
2 specific uses. Courts determine the reasonableness of a single water right holder's use based only on that  
3 right holder's use and statewide considerations of transcendent importance. (*See Joslin*, 67 Cal.2d at  
4 140-41; *Tulare Irrigation Dist.*, 3 Cal.2d at 567; *see also Imperial Irrigation Dist.*, 225 Cal.App.3d at  
5 568-69); *Light*, 226 Cal.App.4th at 1479-81 (internal citations omitted).) And determining whether the  
6 State Board has a mandatory duty is simply a matter of statutory construction in no way implicating  
7 other users' water rights. (*See, e.g., Carrancho*, 111 Cal.App.4th at 1266.) In apparent recognition of the  
8 independence of Channelkeeper's action and its Cross-Complaint, the City requests relief *after*  
9 Channelkeeper's action is resolved. (*See* Cross-Complaint at ¶¶ 24, 30, 35, and at 8:20-9:1.)

10 Further, in overruling and denying the City's demurrer and motion to strike for Channelkeeper's  
11 nonjoinder of other users of the River, this Court recognized that the reasonableness of a use of the  
12 State's waters does not depend on an analysis of other specific uses. (Declaration of Caroline Koch in  
13 Support of Motion to Strike ("Koch Dec.") at ¶ 3, and Ex. A at 17:4-15.) The Court reasoned that the  
14 reasonableness of a single water user's use of the State's waters is decided by following the factors and  
15 criteria established by the California courts, and that other water users need not be joined for the Court  
16 to apply those criteria. (*Id.*, Ex. A at 14:23-15:23.) Accordingly, the controversy about the  
17 unreasonableness of the City's use of the River in no way concerns the specific uses of the 400-plus  
18 cross-defendants.

19 Because Channelkeeper's complaint and writ petition raises no interests in property and the  
20 controversy concerns only Channelkeeper, the City, and the State Board, the causes of action alleged in  
21 the Cross-Complaint cannot assert a claim, interest, or right in the property or controversy that is the  
22 subject matter of Channelkeeper's action. As such, the Cross-Complaint fails to satisfy the requirements  
23 of section 428.10(b)(2).

24 **C. Adding the Third Party Cross-Defendants and the Expansive Causes of Action Alleged**  
25 **in the Cross-Complaint Would Not Serve the Purposes of Joinder.**

26 Given that the causes of action at issue in Channelkeeper's complaint and writ petition do not  
27 relate to the causes of action alleged in the Cross-Complaint, adding the third party cross-defendants and  
28 the City's expansive causes of action would not serve the purposes of permissive joinder.



1 The purpose of allowing a cross-complaint against previously unjoined third parties—a  
2 permissive cross-complaint—under the circumstances outlined section 428.10(b) is to avoid a  
3 multiplicity of suits and to enable a final and binding judgment upon all the matters in dispute between  
4 the parties. (*See Nominelli Construction Co. v. Harris* (1969) 272 Cal.App.2d 352, 357 (citing *Millar v.*  
5 *Millar* (1921) 51 Cal.App. 718, 722).) Cross-complaints on causes of action arising out of the same  
6 transaction or occurrence as the complaint are also meant to eliminate duplication of effort thereby  
7 serving judicial economy. (*See Align Technology, Inc.*, 179 Cal. App. 4th at 961 (explaining that the  
8 purpose of concurrent litigation of related causes of action is to avoid duplication of time and effort.)  
9 The Cross-Complaint does not fit within either purpose.

10 First, the City's Cross-Complaint does not avoid a multiplicity of suits. As discussed above, the  
11 causes of action alleged in the Cross-Complaint do not arise out of the same transaction, occurrence, or  
12 series of transaction and occurrences at issue in Channelkeeper's complaint and writ petition.  
13 Channelkeeper's causes of action against the City and the State Board concern only Channelkeeper, the  
14 City, and the State Board. Nor do any of the cross-defendants have any claims against Channelkeeper  
15 that would be appropriately litigated together with Channelkeeper's claims against the City.

16 Second, considering the causes of action alleged in the Cross-Complaint together with  
17 Channelkeeper's claims against the City and the State Board would not promote judicial economy and  
18 efficiency. To decide the expansive causes of action alleged in the City's Cross-Complaint, the City and  
19 the third party water users will likely need to conduct extensive discovery, including submission of  
20 expert testimony. (*See, e.g., City of Santa Maria v. Adam* (2012) 211 Cal.App.4th 266, 290.) The City  
21 has indicated that it intends to conduct discovery on the causes of action alleged in the Cross-Complaint.  
22 (Koch Dec., ¶ 4.) However, to prove its claims, Channelkeeper does not intend to conduct any  
23 discovery. Based on the evidence submitted with Channelkeeper's complaint and writ petition alone, the  
24 City's use of Reach 4 of the River from April through October is unreasonable and it cannot be  
25 reasonably disputed that the State Board has failed to carry out mandatory duties. (*See Light*, 226  
26 Cal.App.4th at 1479-80 (citing *Tulare Irrigation Dist.*, 3 Cal.2d at 567); *Joslin*, 67 Cal.2d at 141  
27 (holding that the use at issue was "as a matter of law unreasonable within the meaning of the  
28 constitutional amendment"); Answer of Respondent State Water Resources Control Board at ¶¶ 129-

1 133; *see also, e.g.*, Answer of Defendant City of San Buenaventura at ¶¶ 111-119, 124.)

2 Moreover, the City should not be permitted to file a cross-complaint to dictate the scope and  
3 complexity of Channelkeeper's action. (*See, e.g., Thornton v. Luce* (1962) 209 Cal.App.2d 542, 551 ("a  
4 plaintiff should be able to control his case by proceeding against the party or parties whom he feels to be  
5 most clearly liable.").)

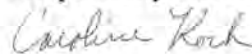
6 Given that none of the purposes of joinder will be served if the Court were to consider the City's  
7 Cross-Complaint with Channelkeeper's complaint and writ petition, the Cross-Complaint is properly  
8 stricken.

9 **V. CONCLUSION**

10 For each of these reasons, the causes of action alleged in the Cross-Complaint are properly  
11 stricken.

12  
13 Dated: June 25, 2015

Respectfully Submitted,



Caroline Koch, Esq.  
Lawyers for Clean Water, Inc.  
Attorneys for Santa Barbara Channelkeeper

# Exhibit E



**FILED**  
San Francisco County Superior Court

SEP 18 2015

CLERK OF THE COURT

BY: *Guadalupe Alameda*  
Deputy Clerk

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10 SANTA BARBARA CHANNELKEEPER

11  
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 IN AND FOR THE COUNTY OF SAN FRANCISCO  
14 SAN FRANCISCO DIVISION  
15

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

18 Petitioner,

19 v.

20 STATE WATER RESOURCES CONTROL  
21 BOARD, a California State Agency; CITY OF  
22 BUENAVENTURA, a California municipal  
23 corporation,

24 Respondents.  
25  
26  
27  
28

Case No. CPF-14-513875

**[Proposed] ORDER STRIKING THE CITY OF  
BUENAVENTURA'S FIRST AMENDED  
COMPLAINT**

1 The above-captioned matter came on regularly for hearing before the Court on Wednesday,  
2 August 26, 2015, on Petitioner and Plaintiff Santa Barbara Channelkeeper's ("Plaintiff") Motion to  
3 Strike Defendant and Cross-Complainant City of San Buenaventura's ("the City") First Amended Cross-  
4 Complaint ("cross-complaint").

5 Caroline Koch of Lawyers for Clean Water, Inc. appeared on behalf of Plaintiff. Gene Tanaka  
6 and Shawn Hagerty of Best Best & Krieger LLP appeared on behalf of the City. Matthew Bullock of the  
7 California Attorney General's Office appeared on behalf of the State Water Resources Control Board.

8 The Court has considered the motion, the City's opposition, the State Board's opposition to  
9 Plaintiff's Motion for a Separate Trial filed concurrently with its Motion to Strike, Plaintiff's replies,  
10 and the parties' arguments presented at the August 26 hearing.

11 Petitioner Santa Barbara Channelkeeper's Motion to Strike First Amended Cross-Complaint is  
12 GRANTED for the following reasons:

13 1) the reasonable use and public trust doctrines do not require the Court to examine other specific  
14 competing water rights on the river to resolve the actual relief that Plaintiff is requesting;

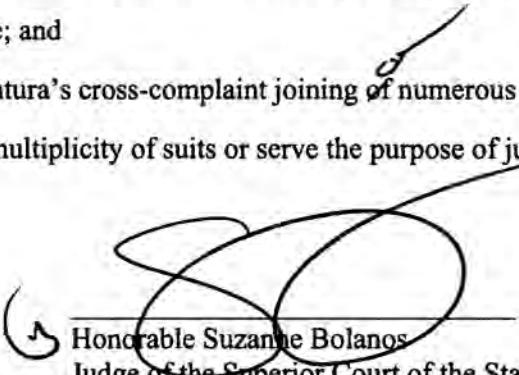
15 2) the Court finds that the City of Buenaventura's cross-complaint does not arise from the same  
16 transaction or occurrence as Plaintiff's claim because the only transaction at issue in Plaintiff's  
17 complaint is whether or not the City of Buenaventura's water use is unreasonable;

18 3) the Court finds that Plaintiff's claim does not implicate a property right. Only the City's  
19 unreasonable use of the river is at issue; and

20 4) finally, the City of Buenaventura's cross-complaint joining of numerous other parties that the  
21 city wishes to join does not prevent a multiplicity of suits or serve the purpose of judicial economy.

22 IT IS SO ORDERED.

23 DATED: SEP 18 2015

24   
25 Honorable Suzanne Bolanos  
26 Judge of the Superior Court of the State of California

27 SEE EXHIBIT "A" RE  
28 COMPLIANCE WITH CRC 3.1312

# Exhibit F

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12 CITY OF SAN BUENAVENTURA

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

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

17 Petitioner,

18 v.

19 STATE WATER RESOURCES CONTROL  
20 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.  
27  
28

Case No. 19STCP01176

Judge: Honorable William F. Highberger

[PROPOSED] ORDER ESTABLISHING  
WATERSHED AND BASIN BOUNDARIES

Dates: December 9, 2021 and  
December 13, 2021

Times: 2:30 p.m. and 4:00 p.m.

Dept: 10

Action Filed: Sept. 19, 2014

Trial Date: Feb. 14, 2022

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- 1 b. The boundaries of basin 4-2, the Ojai Valley Groundwater Basin (Ojai  
2 Basin) are the boundaries defined by DWR in Bulletin 118. The Bulletin  
3 118 – Update 2020 basin boundaries description, including a map, for the  
4 Ojai Basin is attached hereto as Exhibit 2.
- 5 c. The boundaries of basin 4-3.01, the Ventura River Valley – Upper  
6 Ventura River Subbasin (Upper Ventura Basin) are the boundaries  
7 defined by DWR in Bulletin 118. The Bulletin 118 – Update 2020 basin  
8 boundaries description, including a map, for the Upper Ventura Basin is  
9 attached hereto as Exhibit 3.
- 10 d. The boundaries of basin 4-3.02, the Ventura River Valley – Lower  
11 Ventura River Subbasin (Lower Ventura Basin) are the boundaries  
12 defined by DWR in Bulletin 118.<sup>1</sup> The Bulletin 118 – Update 2020 basin  
13 boundaries description, including a map, for the Lower Ventura Basin is  
14 attached hereto as Exhibit 4.

15  
16 IT IS SO ORDERED.

17  
18  
19 Dated: December \_\_, 2021

20 JUDGE OF THE SUPERIOR COURT

21  
22  
23  
24  
25 <sup>1</sup> The Court is only making a determination as to the lateral boundaries of the groundwater basins as defined in  
26 Bulletin 118 and is not making any specific determination as to the definition in Bulletin 118 regarding the depth or  
27 definable bottom, if any, of the Lower Ventura Basin. The Court is expressly reserving issues raised by Cross-  
28 Defendant Aera Energy LLC regarding the connectivity of the Lower Ventura Basin with geologic formations  
employed for oil and gas-related operations and the “exempt aquifer” below the Lower Ventura Basin as defined by  
the California Department of Conservation Geologic Energy Management Division and the U.S. Environmental  
Protection Agency under the federal Safe Drinking Water Act. Such questions shall be reserved for future phases of  
the trial, if not otherwise addressed by stipulation of the parties.

# Exhibit G



# 4-002 OJAI VALLEY

## Basin Boundaries Description

2016

### Summary

The Ojai Valley groundwater basin is located in the central-western portion of Ventura County. The basin is bound on the north by consolidated rocks of the Topatopa Mountains. The easternmost portion of the basin is separated from the adjacent Upper Ojai Valley groundwater basin by the San Cayetano fault. The basin is bound on the south by the Santa Ana fault and the consolidated rocks of Black Mountain. A surface water divide and a subsurface bedrock ridge that forms a groundwater divide separates the basin from the adjoining Upper Ventura River subbasin to the west. South of the Santa Ana fault, thin terrace deposits underlain by bedrock and lacking direct subsurface hydraulic connection with the basin are excluded from the basin. These alluvial terrace deposits have little to no significant groundwater storage capacity. The boundary is defined by 13 segments detailed in the descriptions below.

### Segment Descriptions

This table describes each line segment composing the basin boundary polygon for this basin. It includes fields describing the segment label, segment type, segment description, and cited reference. For more information, email [sgmps@water.ca.gov](mailto:sgmps@water.ca.gov).

<u>Segment Label</u>	<u>Segment Type</u>	<u>Description</u>	<u>Ref</u>
1-2	- Alluvial	Begins from point (1) and crosses the Quaternary alluvium to point (2).	{a}
2-3	E Alluvial	Continues from point (2) and follows the contact of Quaternary alluvium with various Tertiary sedimentary rocks to point (3).	{b}
3-4	- Alluvial	Continues from point (3) and crosses Quaternary alluvium to point (4).	{a}
4-5	E Alluvial	Continues from point (4) and follows the contact of Quaternary alluvium with Tertiary Cozy Dell Shale to point (5).	{b}
5-6	- Alluvial	Continues from point (6) and follows the contact of Quaternary alluvium with various Tertiary sedimentary rocks to point (7).	{b}
6-7	E Alluvial	Continues from point (5) and crosses Quaternary alluvium to point (6).	{a}
7-8	- Fault	Continues from point (7) and follows the San Cayetano fault to point (8).	{c}
8-9	E Alluvial	Continues from point (8) and follows the contact of Quaternary alluvium with various Tertiary sedimentary rocks to point (9).	{b}
9-10	- Fault	Continues from point (9) and follows the Santa Ana fault to point (10).	{a}

10-11	E Alluvial	Continues from point (10) and follows the contact of Quaternary alluvium with Sespe Formation to point (11).	{d}
11-12	I Groundwater Divide	Continues from point (11) and follows a subsurface bedrock ridge and a surface divide to point (12).	{a}
12-1	E Alluvial	Continues from point (12) and follows the contact of Quaternary alluvium with various Tertiary sedimentary rocks and ends at point (1).	{d}
13-13	E Alluvial	Island within the basin boundary: begins from point (13) and follows the contact of the Quaternary alluvium with Coldwater Sandstone and Cozy Dell Shale and ends at point (13).	{b}

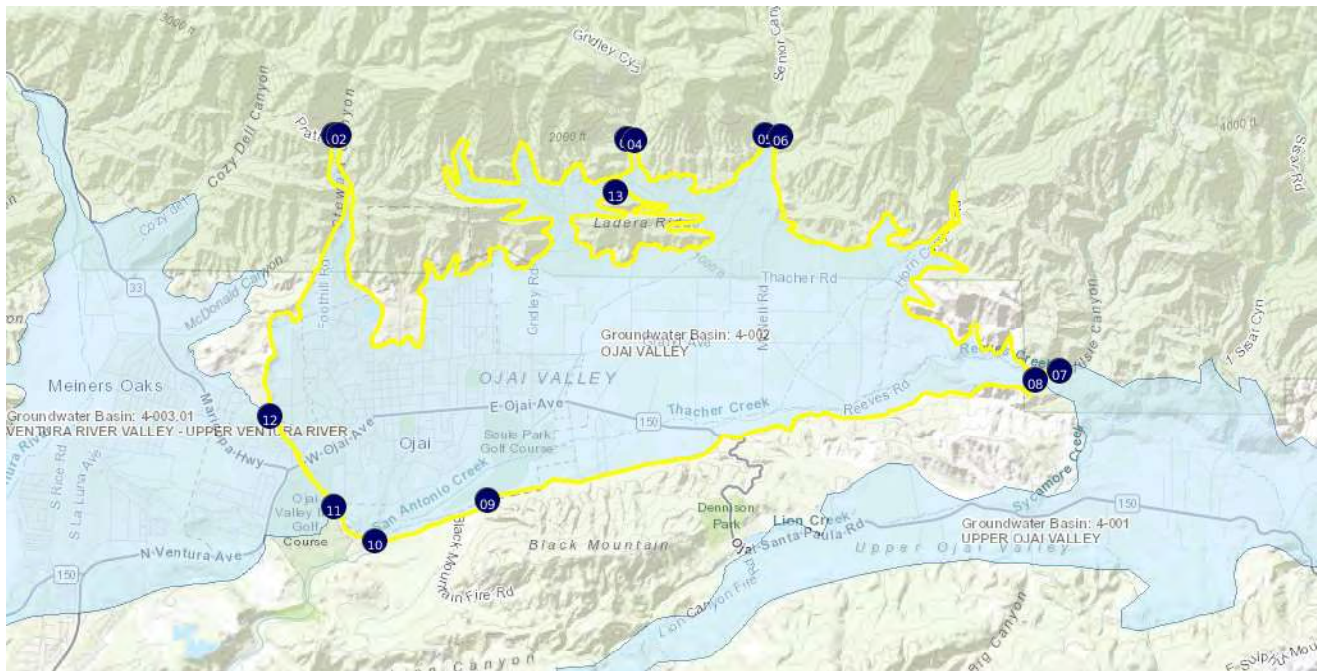
## Significant Coordinates

This table contains the latitudes and longitudes of all the beginning and ending points of each segment comprising the basin boundary polygon for this basin. For more information, email [sgmps@water.ca.gov](mailto:sgmps@water.ca.gov).

<u>Point</u>	<u>Latitude</u>	<u>Longitude</u>	
1	34.478450793	-119.254761878	
2	34.478452261	-119.253960199	
3	34.478005123	-119.215409106	
4	34.477954846	-119.214341855	
5	34.478460727	-119.196917412	
6	34.478300258	-119.19480887	
7	34.452385212	-119.157425748	
8	34.451419976	-119.160576289	
9	34.438199307	-119.234069884	
10	34.433549061	-119.249251927	
11	34.437432018	-119.254670854	
12	34.44740611	-119.263274675	
13	34.472303032	-119.216908514	

# Map

## 4-002 OJAI VALLEY



[Map Link](#)

## References

This table contains the reference listings for the citations noted in the segment description table. Each reference contains the name of the reference, in addition to the publication date. For more information, email [sgmps@water.ca.gov](mailto:sgmps@water.ca.gov).

Ref	Citation	Pub Date	Global ID
{a}	BBMRS	varies	45
{b}	California Department of Conservation, California Geologic Society (CGS), Geologic Map of the Ojai 7.5' Quadrangle, Ventura County, California: A Digital Database, Version 1.0, 1:24,000, S.S. Tan, P.J. Irvine, C.I. Gutierrez. <a href="ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/Prelim_geo_pdf/Ojai_prelim.pdf">ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/Prelim_geo_pdf/Ojai_prelim.pdf</a>	2005	78
{c}	California Geological Survey (CGS), Geologic Atlas of California Map No. 008, Los Angeles Sheet, 1:250,000, Charles W. Jennings and Rudolph G. Strand.URL: <a href="http://www.quake.ca.gov/gmaps/GAM/losangeles/losangeles.html">http://www.quake.ca.gov/gmaps/GAM/losangeles/losangeles.html</a>	1969	33
{d}	California Geological Survey (CGS), Geologic Map of the Matilija Quadrangle, 1:24,000, S.S. Tan and T.A. Jones.URL: <a href="http://www.conservacion.ca.gov/cgs/rghm/rghm/Pages/preliminary_geologic_maps.aspx">http://www.conservacion.ca.gov/cgs/rghm/rghm/Pages/preliminary_geologic_maps.aspx</a>	2006	51

### Footnotes

- I: Internal
- E: External