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4 Attorney for Jean Marie Webster, Trustee  
5 The Roger E. and Jean Marie Webster Trust

6  
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 COUNTY OF LOS ANGELES

9  
10 SANTA BARBARA CHANNELKEEPER, a  
California non-profit corporation,

11 Petitioner,

12 v.

13 STATE WATER RESOURCES CONTROL  
14 BOARD, etc., et al.,

15 Respondents.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

16 CITY OF SAN BUENAVENTURA, etc.,

17  
18 Cross-Complainant

19 v.

20  
21 DUNCAN ABBOTT, an individual, et al.

22  
23 Cross-Defendants.

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

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

27 (a) Name: Jean Marie Webster, Co-Trustee- Roger E. and Jean Marie Webster Trust

28 (b) Address: 3327 Casitas Pass Rd. , Ventura, CA 93001

1 (c) Phone Number: 805-798-4878  
2 (d) Email Address: jeanmarie.webster@gmail.com  
3 (e) Attorney (if applicable): Lindsay F. Nielson

4 **2. The quantity of any groundwater extracted from the basin by the party and  
5 the method of measurement used by the party or the party's predecessor in interest for each  
6 of the previous 10 years preceding the filing of the complaint.**

7 Unkown quantity. No method of measurement

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

10 Water rights attendant to fee ownership including groundwater and rights to the surface  
11 waterways flowing through the property.

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

13 Agricultural (animals and minor crops) and some residential

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

16 There are two wells located on this 1,600 acre mountainous ranch property.

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

18 The water use is confined to our property

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

20 Unknown at this time.

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

24 Unknown at this time.

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

27 Riparian and water rights attendant to fee ownership including groundwater and rights to  
28 the surface waterways flowing through the properties.

**10. The quantity of any replenishment of water to the basin that augmented the  
basin's native water supply, resulting from the intentional storage of imported or nonnative  
water in the basin, managed recharge of surface water, or return flows resulting**

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

4 Unknown at this time. But no surface water and/or creeks are blocked for storage and they flow  
5 into Lake Casitas

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

- 8 (a) Name: JeanMarie Webster  
9 (b) Address: 3327 Casitas Pass Rd., Ventura, CA 9301 or P.O. Box 968, Ojai, CA 93023  
10 (c) Phone Number: (805) 798-4878  
11 (d) Email Address: jeanmarie.webster@gmail.com

12 **OTHERS WITH INFORMATION**

- 13 (a) Name: Casitas Municipal Water Agency  
14 (b) Address: 1055 D. Ventura Ave., Oak View, CA 93022  
15 (c) Phone Number: (805) 649-2251  
16 (d) Email Address: customerservice@casitaswater.com

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

18 None at this time, but this Cross-defendant reserves the right to amend/supplement this  
19 disclosure and assert all defenses and claims of water rights at trial based on discovery and further  
20 research.

21 Dated: June 3, 2021

22 Respectfully submitted,

23   
24 \_\_\_\_\_  
25 LINDSAY F. NIELSON

26 Attorney for Cross-Defendant the Roger E. and  
27 Jean Marie Webster Trust  
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VERIFICATION

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

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

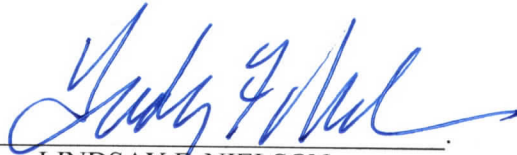
I am a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

I am the attorneys of record for the Roger E. and Jean Marie Webster, Co-Trustees of the Roger E. and Jean Marie Webster Trust, a party to this action.

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

Executed at Ventura, California on June 3, 2021.

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

  
LINDSAY F. NIELSON