E-SERVICE
66648762
Jun 01 2021
05:58PM
File & ServeXpress™

PAUL R. HUFF (CA State Bar No. 211358)
THE HUFF LAW FIRM APC
21 S. California Street, Suite 205
Ventura, California 93001
Telephone: (805) 667-8940
Fax: (805) 850-7399
Email: phuff@hufffirm.com

Attorneys for Cross-Defendant
BARNARD PROPERTIES, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER, a California non-profit corporation,

Petitioner,

v.

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

Respondents.

CITY OF SAN BUENAVENTURA, etc.,

Cross-Complainant

v.

DUNCAN ABBOTT, an individual, et al.

Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

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

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

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

(a) Name: Steve Barnard, Manager, Barnard Properties LLC

(b) Address: 2710 Camino Del Sol, Oxnard, CA 93030

(c) Phone Number: 805-667-8940

(d) Email Address: sbarnard@missionproduce.com

(e) Attorney (if applicable): Paul R. Huff, The Huff Law Firm APC

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

This Cross-Defendant purchases its water from Meiners Oaks Water District and Casitas Municipal Water District.

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

Water rights attendant to fee ownership including groundwater and rights to the surface waterways flowing through the properties.

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

Agricultural and some residential

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

This Cross-Defendant uses water supplied by Casitas Municipal Water District and

Meiners Oaks Water District.

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

This Cross-Defendant uses water supplied by Casitas Municipal Water District and Meiners Oaks Water District.

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

Unknown at this time.

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

Unknown at this time.

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

Riparian and water rights attendant to fee ownership including groundwater and rights to 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 non-native water in the basin, managed recharge of surface water, or return flows resulting from the use of imported water or non-native water on lands overlying the basin by the party, or the party's representative or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Unknown at this time.

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

(a) Name: Steve Barnard

(b) Address: 2710 Camino Del Sol, Oxnard, CA 93030

(c) Phone Number: (805) 667-8940

(d) Email Address: sbarnard@missionproduce.com

(a) Name: Casitas Municipal Water Agency

(b) Address: 1055 D. Ventura Ave., Oak View, CA 93022

(c) Phone Number: (805) 649-2251

(d) Email Address: customerservice@casitaswater.com

(a) Name: Meiners Oaks Water District

(b) Address: 202 W El Roblar Dr, Ojai, CA 93023

(c) Phone Number: (805) 646-2114

(d) Email Address: summer@meinersoakswater.com

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

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

Dated: June 1, 2021

THE HUFF LAW FIRM APC

By: _____

Paul R. Huff
Attorneys for Barnard Properties, LLC

VERIFICATION

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

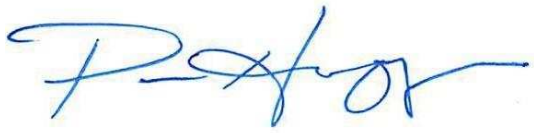
☐ I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

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

☒ I am one of the attorneys of record for Barnard Properties, LLC, 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 1, 2021.

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



Paul R. Huff