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12 CITY OF SAN BUENAVENTURA

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

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

18 Petitioner,

19 v.

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

22 Respondents.

23 CITY OF SAN BUENAVENTURA, etc.,

24 Cross-Complainant,

25 v.

26 DUNCAN ABBOTT, an individual, et al.,

27 Cross-Defendants.
28

EXEMPT FROM FILING FEES PURSUANT
TO GOVERNMENT CODE SECTION 6103

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Superior Court of California
County of Los Angeles

APR 12 2021

Sherri R. Carter, Executive Officer/Clerk
By: Amanda Flores, Deputy

COPY

Case No. 19STCP01176

Judge: Hon. William F. Highberger

STATUS CONFERENCE REPORT

Date: April 19, 2021

Time: 1:30 p.m.

Dept: SS10

Action Filed: Sept. 19, 2014

Trial Date: Not Set

1 and David Gilbert, Trustees of the Loa E. Bliss 2006 Revocable Trust, Claude and Patricia
2 Baggerly, Andrew Whitman, and the State Agencies also submitted briefs related to the law
3 summarized in the Proposing Parties’ brief. Due to time constraints, the Court was not able to
4 discuss these issues with the parties at the March 15, 2021 Status Conference.

5 The Proposing Parties will be prepared to discuss the physical solution briefs at the April
6 19, 2021 Status Conference. At this time, there is no motion pending, and the Proposing Parties
7 are not seeking any tentative or final rulings on substantive issues. However, the Proposing
8 Parties believe that the briefs set forth the basics regarding the physical solution doctrine, and
9 they will be ready to address any questions the Court has regarding that law.

10 As noted in the Proposing Parties’ brief, the Fifth District of the California Court of
11 Appeal has considered several appeals related to the Antelope Valley Groundwater Cases. The
12 Proposing Parties’ cited to the first of those decisions in their brief and notified the Court that
13 other decisions were anticipated. (Proposing Parties’ Brief, p. 30 and fn. 18.) On March 16,
14 2021, the Court of Appeal issued two additional decisions, both of which uphold the trial court’s
15 judgment and physical solution in the Antelope Valley Groundwater Cases. One of the two cases,
16 *Antelope Valley Groundwater Cases* (Cal. Ct. App., Mar. 16, 2021, No. F082469) 2021 WL
17 1301050, reh’g denied (Apr. 6, 2021), was recently ordered published.² The second case, *Los*
18 *Angeles County Waterworks District No. 40 v. Charles Tapia* (Cal. Ct. App., Mar. 16, 2021, No.
19 F082492) 2021 WL 978676, is currently unpublished, but a publication request is pending, and
20 the City will update the Court if the status changes.

21 The responses to the Proposing Parties’ brief do not, in the view of the Proposing Parties,
22 raise any material objections to the basic summary of the law contained in the brief. Rather, the
23 parties make specific contentions about how that law applies or does not apply to the City’s Third
24 Amended Cross-Complaint. The application of the physical solution doctrine to the details of this
25 case was intentionally and expressly not the subject of the brief. The brief was designed to
26 provide the Court with a general overview of the law. The case-specific contentions raised in the
27 responses will need to be addressed by the Court in connection with future motions or during

28 _____
² Only the Westlaw citation is currently available.
82470.00018/33784590.6

1 future phased trials. In its initial draft of this Report, the City proposed language to clarify some
2 of the issues raised in the responses to the Proposing Parties' brief. However, after meeting and
3 conferring with the State Agencies, the City has removed this clarifying language because the
4 City agrees that these case-specific contentions should be reserved for noticed motion practice,
5 evidentiary hearings, and/or phases of trial, not a status conference report. The Proposing Parties
6 respectfully request the opportunity to discuss the substantive issues in their physical solution
7 brief, including replying to the response briefs, at the Status Conference.

8
9 2. THE CITY'S MOTION TO BIFURCATE AND LIFT THE DISCOVERY STAY

10 At the April 19, 2021 Status Conference, the City will ask the Court to set a hearing date
11 for May or June, depending on the Court's availability, for a motion to bifurcate and lift the
12 discovery stay. Recognizing the objections to and the Court's concerns regarding setting a
13 hearing on the proposed physical solution, the City will propose two initial trial phases. The first
14 phase would address basin and watershed boundaries and the interconnection between the basins
15 and the surface water. The second phase would be an evidentiary hearing on the proposed
16 physical solution.

17 The exact parameters of the City's motion will be set forth in its moving papers and
18 related briefs. At this time, however, the City envisions asking the Court to bifurcate the City's
19 Sixth Claim for Relief for Comprehensive Adjudication and Physical Solution, to set a date in
20 November of 2021 for a first phase of trial on watershed boundaries and interconnection, to lift
21 the discovery stay, and to establish a discovery schedule for this first phase. This approach would
22 address multiple concerns expressed by the parties about interconnection, basin boundaries, and
23 the extent and nature of the Watershed. As certain parties have explained, the phasing of legal
24 issues is common in adjudications and consistent with both the Court's inherent powers and with
25 Code of Civil Procedure sections 840(b)(5) and 840(b)(6). This approach would also directly
26 address the legal issues raises by the City of Ojai. Finally, it would be a vehicle to address the
27 concerns raised by counsel for the Whitman parties regarding the boundaries of the Upper Ojai
28 Basin and the boundaries of the Ventura River Watershed, which do not align completely. After

1 resolution of the extent and interconnectivity of the Watershed, a second phase of trial regarding
2 the proposed physical solution could be set in early 2022. The State Agencies agree that
3 approaching this case in phases is appropriate, do not object to a first phase on basin boundaries
4 and interconnectedness, and will provide their perspective on timing in response to the City's
5 specific relief sought in its motion. Counsel for Cross-Defendants the Manfred Krankl and Elaine
6 V. Krankl Living Trust and Kelton Lee Gibson, Trustee of the Gibson Family Trust, dated June 6,
7 2006 requested that we advise the Court that they do not agree with this proposed process nor the
8 physical solution proposed.

9 The City will be prepared to discuss this motion at the Status Conference and will meet
10 and confer with the parties regarding the motion and the City's proposed schedule.

11
12 3. SITE VISIT VIA VIDEO TOUR

13 On March 23, and on April 6, 2021, the City held Zoom meet and confer sessions, which
14 were open to all parties, regarding a proposed site visit. Due to concerns regarding the existing
15 public health orders and concerns about how to structure a site visit consistent with due process
16 and avoidance of ex parte communication, the parties are pursuing the idea of using a drone or
17 other video surveillance device to create or compile a comprehensive video tour of the
18 Watershed. The tentative proposal is to create the video and submit it to the Court for review at a
19 future Status Conference or specially set hearing. The Court would then be able to ask questions
20 of the parties about locations on the video, and all parties would have an opportunity to address
21 the Court's questions. The video would become part of the record of the proceeding and could be
22 used by the parties in future evidentiary hearings as appropriate and subject to proof. The parties
23 who attended the meet and confer sessions appear to have reached a consensus on these basic
24 parameters. Subject to discussion with the Court at the April 19 Status Conference, the parties
25 will work in concert to prepare and submit the video.

1 4. UPDATE RE SERVICE OF THE THIRD AMENDED CROSS-COMPLAINT
2 AND NOTICE OF COMMENCEMENT OF ADJUDICATION

3 The City diligently continues to work to complete service of the Third Amended Cross-
4 Complaint (Cross-Complaint) on all named Cross-Defendants and has completed providing the
5 notice of adjudication and form answer to all overlying landowners within the Ventura River
6 Watershed’s groundwater basins. The City continues to make substantial progress on these
7 efforts.

8 A. Notice

9 On February 21, 2021, the City, through its notice vendor JND Legal Administration
10 (JND), completed the mailing and posting required by Code of Civil Procedure section 836(d).
11 The City will file a notice of completion as required by Code of Civil Procedure section 836(e) in
12 advance of the April 19, 2020 Status Conference. As explained in the notice, the City has
13 completed each of the required steps set forth in Code of Civil Procedure section 836(d). By
14 filing the notice, the City has completed the last remaining step required by Code of Civil
15 Procedure section 836(e). Nothing in Section 836 requires additional action by the City, the
16 Court, or the parties.

17 The City wishes to inform that Court that it has received questions from several property
18 owners who received the notice of adjudication packet, and for whom the City has received a
19 return receipt from the United States Postal Service (USPS), but who did not physically sign the
20 return receipt. This situation did not arise for the notices that were sent prior to the onset of the
21 pandemic but did arise in certain cases for the notices that were sent during the pandemic. This
22 situation is a direct result of changes in the policies of USPS related to the processing of return
23 receipts during the pandemic. Under these modified policies, postal workers were authorized to
24 sign return receipts upon verified delivery of the mailing to avoid direct contact with the
25 recipient. As explained in the City’s notice of completion, the City has fully complied with the
26 required provisions of Section 836(d). However, the City believes that this explanation of
27 USPS’s pandemic policy is important to emphasize in light of the approximately twenty inquiries
28 the City has received regarding the return receipts.

1 B. Service of Original Cross-Defendants Named in the Third Amended Cross-
2 Complaint

3 As of the last Status Conference, there were 137 unserved Cross-Defendants out of the
4 over 2,500 Cross-Defendants named in the Third Amended Cross-Complaint. Since then, the
5 City has successfully served 35 Cross-Defendants in March and early April and is continuing
6 efforts to serve the remaining 102. Summary tables are provided below. The City will continue
7 to attempt to locate and serve these un-served Cross-Defendants, including by conducting
8 targeted outreach and phone calls to and additional researching and tracking of un-served Cross-
9 Defendants.

Total Cross-Defendants	2,596
Served Cross-Defendants	2,494
Unserved Cross-Defendants	102

14 Known details regarding categories of un-served Cross-Defendants are summarized in the table
15 below.

Located behind locked gates	53
Evading service or reattempts to be made by process servers	32
Deceased with no known successors/Vacant properties requiring further information from Tax Collector	17

17 After the last Status Conference and receipt of the Judge’s tentative ruling on March 15,
18 2021, the City contacted the Ventura County Sheriff’s office to inquire whether the Sheriff would
19 be more successful than a private process server company at personally serving a private
20 residence located behind fences and gates. During this conversation, the City also inquired
21 whether the Sheriff had any further powers to serve such individuals personally. The Sheriff’s
22 office explained that they have the same powers and duties under the California Code of Civil
23 Procedure as a private process server. They did not have any further suggestions as to how the
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1 City could lawfully serve a private residence behind fences and gates.

2 In advance of the April 19 Status Conference, and consistent with the discussion with the
3 Court at the March Status Conference, the City will submit an application for an order to serve
4 via publication those 53 Cross-Defendants that are behind fences and gates.

5
6 C. Roes

7 On March 3, 2021, the City filed and served two amendments to its Third Amended
8 Cross-Complaint adding newly discovered Roe property owners in the Watershed. On April 8,
9 2021, City filed and served Amendments No. 4 and No. 5 to add Roes 381-417. Amendment No.
10 4 adds additional riparian properties for which required further research is required in order to
11 determine both property ownership and corporate status along with further research to locate
12 physical addresses of individuals who were not receiving the tax bills for the property.
13 Amendment No. 5 adds two individuals that recently purchased a property in the Watershed, the
14 prior owners of which informed the City after they were served with process. A summary of
15 service status is set forth in the table below.

16

17 Total Roe Cross-Defendants – Amendment Nos. 2-3 (Roes 2-380)	379
18 Served Roe Cross-Defendants	170
19 Unserved Roe Cross-Defendants	209
20 New Roes Amendment Nos. 4-5 (Roes 381-417) (service to 21 commence in April)	36

22

23 It should be noted that in a large watershed adjudication such as this one, it is typical that
24 additional parties and parcels are identified for either inclusion or exclusion due to e.g., deaths of
25 owners, probate transfers, divorce, other changes in ownership, and modification of assessor
26 parcel numbers. This process is ongoing and will continue even after any judgment is entered.
27 The City is taking steps now to include all known required parties, but the City wishes to make
28 the Court aware that additional information will continue to be obtained that will likely require

1 additional changes even after any judgment is entered.

2
3 D. Extension of Time to File Proofs of Service

4 On April 1, 2021, the City filed two Ex Parte Applications for Extension of Time to File
5 Proofs of Service, one for the remaining named Cross-Defendants, and another for the Roe Cross-
6 Defendants 2-380. The City respectfully requests that the Court grant the two applications so that
7 the City will have until July 1, 2021 to file the remaining proofs of service for all un-served
8 Cross-Defendants.

9
10 E. Defaults

11 The City is in process of drafting 1,381 requests for entry of default packages in groups of
12 approximately twenty defaults per package. On March 8, 2021, the City submitted five groups of
13 twenty, and one group of 19, totaling 119 defaults. On March 19, 2021, the City received a
14 Notice of Rejection for one request for entry of default as to Cross-Defendant Bernadette King,
15 due to a clerical error of a misspelled name on the proof of service. On April 9, 2021, the City re-
16 filed this single Request for Entry of Default. On April 12, 2021, the City submitted another 120
17 Requests for Entry of Default. Currently, the City has filed 237 requests for entry of default.

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Total Defaults	1,381
Filed Defaults	237
Remaining Defaults	1,144

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22 F. Dismissals

23 On March 1, 2021, the City filed two sets of dismissals totaling 166 named Cross-
24 Defendants. One set of dismissals of twenty-nine parties is for deceased and/or misnamed Cross-
25 Defendants. The second set of 134 dismissals is for Cross-Defendants who sold their riparian
26 parcel(s) and no longer own any real property interest in the Watershed. The City discovered
27 during the personal service process that three additional properties were recently sold and it has
28

1 filed one dismissal as to six individual Cross-Defendants. In addition, the City has filed another
2 set of dismissals for approximately five deceased owners and two who are being dismissed due to
3 no longer owning a portion of real property that the City discovered during the personal service
4 process. These individuals are still listed as record owners on the property ownership records.

5 The City has also contacted the Tax Collector's office for the County of Ventura and is in
6 the process of requesting further payment information for approximately seventeen properties in
7 which the taxes have been paid, property ownership has not been updated, and Tax Assessor
8 records provided to the City show either a PO Box, or a physical address that has been
9 unsuccessfully served. The Tax Collector has agreed to assist the City with further information as
10 soon as practicable given that it is the Tax Collector's heavy collection season. The City may
11 need to amend the names of Cross-Defendants for these seventeen properties to include new
12 information as the successors to the properties are identified. A summary of the requests for
13 dismissal is set forth the table below.

Total Dismissals	177
Filed Dismissals	163
Remaining Dismissals	13

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19 G. Coordination with Court Staff

20 Counsel for the City and its staff members have been and will continue to work closely
21 with Court staff to ensure items are being filed and party information is being managed in
22 accordance with the Court's requirements and specifications. Court staff has been very
23 accommodating and helpful, and the City will continue to work closely and coordinate with Court
24 staff to facilitate its recordkeeping and case management needs. The City will make every effort
25 to reduce the burden of this large and complicated matter on the Court and its staff.

26 The City has discussed with the Court the idea of hiring an outside vendor to maintain a
27 separate register of actions and document database for ease of searching and finding relevant filed
28 documents by Cross-Defendant name, document type, filing party, and date submitted/accepted

1 by the Court for filing. This procedure has been implemented in other water adjudications. As of
2 the filing of this report, the Court staff and City staff have been unable to discuss this proposal in
3 detail.

4
5 H. Stipulations For Entry of Physical Solution and Judgment

6 Counsel for the City has continued to work closely with the Ryan Blatz Law Firm and
7 other interested parties who wish to stipulate to the physical solution in lieu of filing an answer.
8 The City is working with Mr. Blatz to submit amended and correctly-worded stipulations for the
9 Court's consideration and approval. Approximately 8 new parties have also requested to stipulate
10 to the proposed physical solution, and the City continues its ongoing efforts to identify individual
11 members of erroneously named Cross-Defendant the Gridley Road Water Group who wish to
12 sign stipulations. A chart showing the stipulating parties and status (e.g., filed and approved, to
13 be amended, rejected and to be revised, and new and pending requests) of all stipulations is
14 attached hereto as Exhibit A.

15
16 I. Case Website

17 The City continues to maintain and update the neutral adjudication website, available at:
18 <https://www.venturariverwatershedadjudication.com>.

19
20 5. NEWLY APPEARING PARTIES

21 A. Answers

22 As of April 12, 2021, the following additional parties have filed answers to the City's
23 Third Amended Cross-Complaint:

- 24 1. William Thacher, filed 1/28/21
- 25 2. Laura R. Shreiner, a.k.a. Laura Rearwin, filed 1/29/21
- 26 3. Amy Hueppe, filed 1/29/21
- 27 4. Paul J. Deneen, filed 1/29/21
- 28 5. Jennifer Carafelli and Robin Schwartzburd, filed 1/29/21

- 1 6. Glenn Bator, filed 1/29/21
- 2 7. John Peakes Jr. and Laura M. Peakes, filed 1/29/21
- 3 8. Kelsey Klein and Paula Kee, filed 1/29/21
- 4 9. 235 N. La Luna Owners, an unincorporated association, filed 2/1/21
- 5 10. Harry Anthony and Kristie M. Williams, filed 2/1/21
- 6 11. Timothy Mahoney, filed 2/3/21
- 7 12. Jeff Bacon, as Trustee of the Villa Nero Trust Dated January 25, 2000,
- 8 filed 2/9/21
- 9 13. Rebecca C. Collins, filed 3/8/21
- 10 14. Thomas M. Collins, Jr., filed 3/8/21
- 11 15. Ojai Valley Inn, filed 3/11/21

12 On March 11, and March 26, 2021, the City provided notice to the twenty newly
13 appearing parties identified in its Status Conference Report, filed March 8, 2021, and to parties
14 one through twelve above, that because their answers were filed before March 1, 2021, their
15 initial disclosures are due by June 1, 2021, pursuant to the Court’s order on February 9, 2021.
16 The City only recently became aware of these answers because none of these parties served the
17 City with them. The City obtained these answers from the Court’s document retrieval portal on
18 March 9, and 12, 2021.

19

20 6. CHANNELKEEPER NOTICE OF DISMISSAL

21 In September of 2019, the City and Channelkeeper entered into a settlement agreement
22 regarding Channelkeeper’s Complaint for Declaratory Relief and Petition for Writ of Mandate.
23 The City is a named defendant in the First Cause of Action in that Complaint. In the settlement
24 agreement, the City agreed to implement a Pilot Project of flow restrictions at Foster Park and
25 agreed to take other actions. Channelkeeper released and waived its claims against the City other
26 than two reserved issues. First, Channelkeeper reserved its “claim after the Pilot Project is
27 completed but before entry of a stipulated judgment in the adjudication that future pumping and
28 diversion of water in Reach 4 of the Ventura River is an unreasonable use in violation of the

1 California Constitution Article X, Section 2, and the public trust doctrine.” Channelkeeper also
2 reserved its claims for unresolved attorney’s fees and costs in the amount of \$191,075.29.

3 As the Court is aware, at the June 24, 2020 Status Conference, after the time for the Pilot
4 Project had ended, Channelkeeper informed the Court of its plan to bring a motion for interim
5 flow measures at Foster Park. The City and Channelkeeper met and conferred over this issue, and
6 in August 2020, the City and Channelkeeper amended the settlement agreement to address the
7 issue. As part of that amended agreement, Channelkeeper agreed “not to seek other interim relief
8 regarding flow.” The amended agreement provided that the “settlement relating to interim flows
9 in no way impacts Channelkeeper’s ability to comment on, support, or challenge the physical
10 solution proposed by any party in the Action.” The amended agreement therefore leaves only two
11 issues remaining as between the City and Channelkeeper—an unresolved claim for attorney’s
12 fees and costs and Channelkeeper’s participation in the issues related to the physical solution. All
13 other issues are resolved.

14 On March 16, 2021, Channelkeeper submitted its Request for Dismissal pursuant to the
15 settlement to the Court for filing via the Court’s drop box.

16
17 7. CONCLUSION AND SUMMARY OF REQUESTS

18 Based on the above Report, the City respectfully requests that the Court consider taking
19 the following actions at the April Status Conference:


- 20 • Discuss and address any general questions raised by the physical solution briefs
21 and responses, reserving any specific decisions on substantive legal issues for
22 motion practice or trial as appropriate.
- 23 • Set a hearing date in late May or early June for the City’s motion to bifurcate and
24 lift the discovery stay.
- 25 • Grant the City’s two ex parte applications to extend the date for filing proofs of
26 service.
- 27 • Grant the City’s application to serve certain Cross-Defendants located behind
28 locked gates by publication.

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- Provide direction to the parties regarding the proposal to conduct the site visit through the use of a video to be viewed by the Court at a future Status Conference or specially set hearing.

Dated: April 12, 2021

BEST BEST & KRIEGER LLP

By: 
SHAWN D. MAGERTY
CHRISTOPHER MARK PISANO
SARAH CHRISTOPHER FOLEY
Attorneys for Respondent and Cross-Complainant
CITY OF SAN BUENAVENTURA

Dated: April 12, 2021

HERUM CRABTREE SUNTAG

By: /S/ Jeanne Zolezzi
JEANNE ZOLEZZI
Attorneys for Cross-Defendants
MEINERS OAKS WATER DISTRICT
AND VENTURA RIVER WATER
DISTRICT

EXHIBIT A

STIPULATION STATUS

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
Case No. 19STCP01176

I. STIPULATIONS FILED AND APPROVED BY COURT (obtained from Court website)

No.	Date Filed	Stipulating Party Names as Filed w/Court	APNs Included in Filed Stipulation	Status in Case
1.	2/9/21	Chet Hilgers and Mellanie Hilgers	023-0-150-205, 022-0-022-090	Overliers
2.	2/9/21	David Bishop and Sophie Loire	031-0-111-055	Overliers
3.	2/9/21	Stephanie Gustafson	024-0-120-045	Cross-Defendant
4.	3/15/21	Kristi Schoeld and Niel Jorgensen	020-0-080-310	Overliers
5.	3/24/21	Chris E. Platt and Hanh H. Platt	011-0-240-265	Overliers
6.	3/24/21	Deborah Lys Martin Crawford	021-0-072-100	Overlier
7.	3/24/21	Erica J. Abrams, Trustee of the Erica J. Abrams Trust	028-0-130-045	Overlier
8.	3/24/21	Frank Clay Creasey Jr.	024-0-131-015	Overlier
9.	3/24/21	Frederic DeVault	018-0-071-230	Cross-Defendant
10.	3/24/21	Gilbert G. Vondriska and Carolyn J. Vondriska, Trustees of the Vondriska Living Trust	021-0-071-110, 021-0-082-080	Overliers
11.	3/24/21	James P. Robie, Trustee of the Robie Family Trust	011-0-220-295	Overlier
12.	3/24/21	John H. Thacher and Caroline H. Thacher, Trustees of the Thacher Family Trust dated January 2004	028-0-070-030, 028-0-070-040	Overliers
13.	3/24/21	Mandy Macaluso, Trustee of the Living Trust of Mandy Macaluso	018-0-102-315	Cross-Defendant
14.	3/24/21	Margot J. Griswold	040-0-220-265	Overlier

EXHIBIT A

STIPULATION STATUS

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
Case No. 19STCP01176

No.	Date Filed	Stipulating Party Names as Filed w/Court	APNs Included in Filed Stipulation	Status in Case
15.	3/24/21	Mark Sutherland, Trustee of the Sutherland Marital Trust	014-0-090-825, 014-0-090-835	Overlier
16.	3/24/21	Randall Leavitt, Trustee of the Randall B. Leavitt 2010 Trust	020-0-100-080	Overlier
17.	3/24/21	Raul E. Alvarado and Hildegard M. Alvarado, trustees of the Alvarado Family Trust	024-0-131-035	Overliers
18.	3/24/21	Sumeet Bhatia and Michael McDonald	014-0-030-290	Cross-Defendants
19.	3/24/21	Timothy Jerome Murch and Jody Caren Murch, Trustees of the Jodim Family 2007 Trust dated July 31, 2007	017-0-302-065 019-0-092-050	Overliers
20.	3/24/21	Wendell M. Mortensen and Laura L. Mortensen, Trustees of the Mortensen Family Revocable Trust	031-0-112-345, 031-0-112-355	Overliers
21.	3/24/21	Petter Romming and Kimi Romming, Trustees	024-0-142-075	Overliers
22.	3/24/21	William Armstrong and April Nardini	010-0-193-055, 010-0-193-325, 010-0-193-315	Overliers
23.	3/24/21	Konrad Stefan Sonnenfeld, Trustee of the Konrad Stefan Sonnenfeld Living Trust	020-0-021-110	Overlier

EXHIBIT A

STIPULATION STATUS

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
Case No. 19STCP01176

II. FILED AND APPROVED STIPULATIONS TO BE AMENDED

No.	Date Filed	Stipulating Party Names as Filed w/Court	APNs Included in Filed Stipulation	Status in Case
1.	3/24/21	Diane Syvertson, Trustee of the Diana Syvertson Living Trust	024-0-072-705	Cross-Defendant Note: Additional APNs owned as Cross-Defendant: 024-0-072-715 024-0-072-695 APNs owned as an Overlying landowner: 024-0-072-685 Amended stipulation to be proposed to Attorney Blatz.
2.	3/24/21	Marilyn Wallace, Trustee of the Marilyn Wallace Separate Property Trust	022-0-051-290	Cross-Defendant Note: Additional APNs owned as Cross-Defendant: 011-0-220-035 Amended stipulation to be proposed to Ms. Wallace.
3.	3/24/21	William Erickson	031-0-101-045	Named Cross-Defendant Note: Additional APNs owned as Cross-Defendant - 031-0-223-125 Amended stipulation to be proposed to Attorney Blatz.

EXHIBIT A

STIPULATION STATUS

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
Case No. 19STCP01176

III. REJECTED STIPULATIONS TO REVISE

No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
1.	Paul Lepiane and Bengtson Bo	032-0-010-065	Paul Lepiane and Bo Bengtson	Cross-Defendants Note: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendant.
2.	James S. Bennett and Carolyn D. Bennett, Trustees of the Bennett Family Trust	030-0-200-075	James and Carolyn Bennett	Overliers Note: James S. Bennett and Carolyn D. Bennett, Trustees of the Bennett Family Trust (erroneously identified in the Court's overlier listing as James and Carolyn Bennett) Amended stipulation to be proposed to Attorney Blatz correcting naming of Overliers.

EXHIBIT A

STIPULATION STATUS

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
Case No. 19STCP01176

No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
3.	Thomas D. Carver and Cynthia L. Carver	018-0-111-245	Thomas and Cynthia Carver	Cross-Defendants Note: Stipulation incorrectly identifies them as overlies; they are Cross-Defendants Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
4.	Edward C. Leicht and Jacqueline M. Leicht, Trustees of the Leicht Family 2013 Revocable Trust dated March 1, 2013	034-0-260-135	Edward C. Leicht and Jacqueline M. Leicht, individually as Trustees of the Leicht Family 2013 Trust Revocable Trust	Cross-Defendants Note: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
5.	Daniel J. McSweeney and Yoko McSweeney	024-0-133-075	Daniel and Yoko McSweeney	Cross-Defendants Note: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
6.	Kevin Rainwater and Marianne Ratcliff	040-0-010-215 040-0-010-125	Overliers	Overliers Note: Amended stipulation to be proposed to Attorney Blatz correcting naming of Overliers.

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No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
7.	Debra Joy Reed, Trustee of the Debra Joy Reed Revocable Trust dated November 3, 1994	024-0-033-100	Overliers	Overlier Note: Her name does not appear in the overlier list. Amended stipulation to be proposed to Attorney Blatz correcting naming of Overliers. City to give the Court an updated overlier spreadsheet to correct this issue
8.	Michael D. Robertson and Kimberly A. Robertson, Trustees of the Robertson Family Trust	028-0-120-105 028-0-112-130	Michael and Kimberly Robertson	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
9.	William D. Rusin, Sr., Trustee of the William D. Rusin Sr. Revocable Trust	029-0-081-105 019-0-082-025	William Rusin	Cross-Defendant Notes: meet and confer with Attorney Blatz regarding revising stipulation.
10.	Brian S. Stafford and Janice M. Thomas, individually as Trustees of the Stafford Thomas Family Trust	019-0-030-300	Brian S. Stafford and Janice M. Thomas, individually as Trustees of the Stafford Thomas Family Trust est., March 22, 2019	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.

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No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
11.	Richard Aaron Carlson, Trustee of the Richard Aaron Carlson Trust and Michelle Larson, Trustee of the Michelle Larson Family Trust	011-0-230-035	The Michelle Larson Family Trust; Trust Of Richard Aaron Carlson,	Overliers Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Overliers.
12.	Dive Deep L.L.C.	009-0-070-110 009-0-070-190 009-0-070-200	Dive Deep, LLC	Overliers Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Overliers.
13.	Robert Erickson, Trustee and Ronald Wilson	024-0-141-035	Robert Erickson and Ronald Wilson	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
14.	Douglas Roy Parent and Ann Marie Parent	060-0-270-195 060-0-270-220 060-0-270-240	Douglas and Ann Parent	Cross-Defendants (060-0-270-220) and Overliers (060-0-270-195, 060-0-270-240) Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants and Overliers.
15.	Ojai Jackman L.L.C.	028-0-120-225 029-0-014-060 029-0-081-040	Ojai-Jackman, LLC	Cross-Defendant Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants and Overliers and adding APNs 023-0-160-105, 028-0-073-050, and 029-0-140-060.

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No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
16.	Thomas Lann Harper and Jadona Collier-Harper	018-0-071-280	Thomas and Jadona Collier Harper	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
17.	Brian C. Haase and Marie Haase, Trustees of the B&M Haase Trust dated October 8, 2019	010-0-180-490	Brian and Marie Haase	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
18.	Jan Stephen Granade and Priscilla K. Granade, Trustees of the Granade Family Revocable Living Trust	018-0-071-260	Jan and Priscilla Granade	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
19.	Robert Levin and Lisa Solinas, Trustees of the Levin Family Living Trust	019-0-020-210	Robert Levin and Lisa Solinas	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants.
20.	Heidi C. Kurtz, Trustee of the Kurtz Family Trust dated January 19, 2019	017-0-180-610	Heidi C. Kurtz, Trustee of the Gunild Walsh Seadrift Qprt FBO Heidi C. Kurtz Gunild Seadrift	Cross-Defendant Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendant.

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No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
21.	Dana Cenicerros, Trustee of the Dana and Dawn Cenicerros Revocable Living Trust	009-0-070-090	Dana Cenicerros	Cross-Defendant Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendants (adding property owner Dawn Cencineros) and adding APN 009-0-070-090.
22.	Gelb Enterprises L.P.	009-0-060-065 090-0-070-160	Gelb Enterprises	Cross-Defendant Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendant.
23.	Giannetti Living Trust	024-0-120-035	Stephen & Brooke Giannetti	Overliers Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Overliers.
24.	Marc Saleh, Trustee of the Saleh Family Trust	028-0-040-110	Mark Saleh	Cross-Defendant Notes: meet and confer with Attorney Blatz regarding revising stipulation.
25.	Francis Longstaff and Shauna Longstaff, Trustees of the Longstaff Trust dated October 11, 2018	011-0-250-085	Francis and Shauna Longstaff	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendant.

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No.	Stipulating Party Names as Filed:	APNs Included in Stipulation	Name as Appears on Caption/Overlier Spreadsheet	Status in Case
26.	John Joseph Broesamle and Katharine Sue Broesamle, Trustees of the Boresamle Family Trust	014-0-100-390	John and Katharine Broesamle	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendant.
27.	Keith M. Nightingale and Victoria V. Nightingale, Trustees of the Nightingale Family Trust	029-0-032-020 029-0-032-195	Keith and Victoria Nightingale	Cross-Defendants Notes: Amended stipulation to be proposed to Attorney Blatz correcting naming of Cross-Defendant.
28.	Gridley Water Group			Notes: City will meet and confer with Gridley Water Group representative regarding revising stipulations with these parties.

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IV. OTHER/NEW STIPULATIONS

No.	Stipulating Party Names	APNs Included in Stipulation	Status in Case	Stipulation filed with Court by Cross-Defendant and/or Overlier?
1.	Big Black Dog, LLC	063-0-140-405	Cross-Defendant City provided its executed stipulation on 4/1/21 to counsel for Big Black Doc, LLC	
2.	Ventura Unified School District	063-0-131-045; 068-0-040-045; 063-0-140-605; 063-0-140-615; 068-0-052-255; 068-0-082-135; 068-0-101-150; 069-0-030-030; 069-0-030-110; 071-0-040-160; 071-0-052-020; 071-0-095-010	Cross-Defendant City provided its executed stipulation on 4/1/21 to counsel for Ventura Unified School District.	
3.	The Roman Catholic Archbishop of Los Angeles, a sole corporation	017-0-210-470	Cross-Defendant City provided its executed stipulation on 2/24/21 to counsel for The Roman Catholic Archbishop of Los Angeles.	
4.	Samuel Rufus Williams and Paytre Ruth Topp	009-0-080-020 009-0-090-020	Cross-Defendant Notes: Stipulation to be proposed to Attorney Blatz	

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No.	Stipulating Party Names	APNs Included in Stipulation	Status in Case	Stipulation filed with Court by Cross-Defendant and/or Overlier?
5.	Floyd Dee Fitzgerald and Charlene D. Fitzgerald, Trustees of the Fitzgerald Family Trust	018-0-111-275 018-0-111-255 (well property) 018-0-102-395 018-0-102-405	Cross Defendants and Overliers Notes: Stipulation to be proposed to Attorney Blatz	
6.	Scott Williams and Rebecca Williams	011-0-270-095 011-0-270-085	Cross-Defendants (Roe 374 and 375) Notes: Stipulation to be proposed to Attorney Blatz	
7.	Aubrey Balkind	010-0-180-470	Cross-Defendants Notes: Stipulation to be proposed to Attorney Blatz	
8.	Janice Kanellis	034-0-040-220	Cross-Defendant (Roe 306) Notes: Stipulation to be proposed to Attorney Blatz	