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6 Trust

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8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, COMPLEX CIVIL DIVISION**

10
11 SANTA BARBARA CHANNELKEEPER,
A California non-profit corporation,

12 **Petitioner,**

13 **v.**

14 STATE WATER RESOURCES
15 CONTROL BOARD, a California State
Agency; CITY OF SAN
16 BUENAVENTURA, a California
municipal corporation,

17 **Respondents.**

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19
20
21 **AND RELATED CROSS-ACTION.**
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Case No. 19STCP01176

Assigned for all purposes to the Hon. William F.
Highberger, Dept. SS10

**INITIAL DISCLOSURES OF BETTINA
CHANDLER, TRUSTEE OF THE BETTINA
CHANDLER TRUST (CAL. CODE CIV.
PROC., § 842)**

Action Filed: September 19, 2014

1 Pursuant to California Code of Civil Procedure (“C.C.P.”) section 842, cross-defendant
2 Bettina Chandler, Trustee of the Bettina Chandler Trust (“Chandler”) hereby submits her initial
3 disclosures based on the information reasonably available to her. (C.C.P. § 842, subd. (c).)
4 Chandler reserves the right to supplement its disclosures in accordance with C.C.P. section 842,
5 subdivision (d) and otherwise.

6 DISCLOSURES

7 **1. C.C.P. § 842(a)(1):** The name, address, telephone number, and email address of
8 the party and, if applicable, the party’s attorney.

9 Chandler’s address is 1013 Shokat Drive. Chandler may be contacted at 805.649.9117 and
10 bchand1941@aol.com.

11 Chandler is represented by Neal Maguire of Ferguon Case Orr Paterson LLP, 1050 South
12 Kimball Road, Ventura, California 93004; (805) 659-6800 and nmaguire@fcoplaw.com.

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14 **2. C.C.P. § 842(a)(2):** The quantity of any groundwater extracted from the basin by
15 the party and the method of measurement used by the party or the party’s predecessor in interest
16 for each of the previous 10 years preceding the filing of the complaint.

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18 Year	Total Water Production from the Ventura River Watershed
19 2004-2020	1 AF annually (estimate)

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21 **3. C.C.P. § 842(a)(3):** The type of water right or rights claimed by the party for the
22 extraction of groundwater.

23 Chandler asserts overlying rights to produce and use groundwater, including rights under
24 the self-help doctrine if prescriptive rights are asserted. Alternatively, Chandler asserts riparian or
25 appropriative rights.

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27 **4. C.C.P. § 842(a)(4):** A general description of the purpose to which the groundwater
28 has been put.

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Chandler utilizes water for domestic and ancillary agricultural irrigation uses.

5. C.C.P. § 842(a)(5): The location of each well or other source through which water has been extracted.

Chandler produces water from a well referenced as State Well Number 04N23W17B03S located on Assessor Parcel Number 011-0-230-105.

6. C.C.P. § 842(a)(6): The area in which the groundwater has been used. Chandler uses water on Assessor Parcel Number 011-0-230-105.

7. C.C.P. § 842(a)(7): Any claims for increased or future use of groundwater. Chandler claims the right to a reasonable and beneficial amount of water in the future.

8. C.C.P. § 842(a)(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.

At this time, Chandler does not assert such rights. Her investigation is on-going.

9. C.C.P. § 842(a)(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.

At this time, Chandler does not assert rights associated with surface water. Her investigation is on-going.

10. C.C.P. § 842(a)(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

1 filing of the complaint.

2 At this time, Chandler does not assert rights associated with imported or non-native water
3 from outside the Ventura River Watershed being utilized for replenishment purposes. Her
4 investigation is on-going.

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6 **11. C.C.P. § 842(a)(11):** The names, addresses, telephone numbers, and email
7 addresses of all persons possessing information that supports the party's disclosures.


8 At this time, Chandler is not aware of other pertinent persons. Her investigation is on-
9 going.

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11 **12. C.C.P. § 842(a)(12):** Any other facts that tend to prove the party's claimed water
12 right.

13 At this time, Chandler does not assert other facts, but her investigation is on-going.

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15 Date: June 1, 2021

FERGUSON CASE ORR PATERSON LLP

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17 By: 
18 Neal Maguire
19 Attorneys for Cross-Defendant
20 Bettina Chandler, Trustee of the Bettina
21 Chandler Trust
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VERIFICATION

I, Bettina Chandler, declare as follows:

I am the Trustee of the Bettina Chandler Trust, a cross-defendant in the above-entitled action, and make this verification on its behalf. I have reviewed the INITIAL DISCLOSURES and know the contents thereof. The matters stated therein are true based on the information reasonably available to me at this time.

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

Executed on May 28, 2021 at Ojai, California.



Bettina Chandler

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF VENTURA:

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action. My business address is 1050 South Kimball Road, Ventura, California 93004.

On June 1, 2021, I served the original a true copy of the foregoing documents described as *INITIAL DISCLOSURES OF BETTINA CHANDLER, TRUSTEE OF THE BETTINA CHANDLER TRUST* which is related to the action styled *Santa Barbara Channelkeeper v. State Water Resource etc. et al*, Los Angeles Superior Court, Complex Civil Division, Case No. 19STCP01176, as follows:

BY MAIL: I enclosed the above-described document in (an) envelope(s) with postage thereon fully pre-paid and addressed as set forth on the attached Service List. I am readily familiar with FERGUSON CASE ORR PATERSON LLP's practice of collection and processing correspondence for mail with the U.S. Postal Service. Pursuant to that practice, I placed the above-described envelope into the Firm's designated receptacle, of which the contents are to be deposited with the U.S. Postal Service on that same day at, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date stated herein.


BY OVERNIGHT DELIVERY: I enclosed the above-described document in (an) envelope(s) of a type designated by the express service carrier for overnight delivery with delivery fees fully pre-paid or provided for and addressed as set forth on the attached Service List. I placed the above-described envelope into a box or other facility regularly maintained by the express service carrier/ delivered the above-described envelope to an authorized courier or driver authorized by the express service carrier to receive documents.

BY ELECTRONIC TRANSMISSION: By transmission via E-Service to File & ServeXpress to the service list for this matter.

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

(Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 1, 2021, at Ventura, California.



Neal Maguire