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Superior Court of California
County of Los Angeles

AUG 21 2019

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By [Signature], Deputy
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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES

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

15
16 Petitioner,

17 v.

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

21 Respondents.
22

23 CITY OF SAN BUENAVENTURA, a
California municipal corporation,

24 Cross-Complainant

25 v.

26 DUNCAN ABBOTT, an individual, et al.
27

28 Cross-Defendants.

Case No. 19STCP01176
Judge: Honorable William F. Highberger

STIPULATION FOR STAY
[Filed with [Proposed] Order]

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

STIPULATION FOR STAY

The parties to this Stipulation (collectively “Stipulating Parties”) are all the parties who have appeared in this lawsuit. The Stipulating Parties, through their attorneys, recite and agree as follows:

RECITALS

1. In September 2014, Petitioner Santa Barbara Channelkeeper (“Channelkeeper”) filed a Complaint and Petition for Declaratory Relief and a Writ of Mandate pursuant to Code of Civil Procedure section 1085 against the City of San Buenaventura (“City”) and the State Water Resources Control Board (“State Board”). Channelkeeper asked the Court to declare the City’s use of Reach 4 of the Ventura River from April through October is unreasonable, in violation of article X, section 2 of the California Constitution, and to direct the State Board to perform alleged mandatory duties under article X, section 2, Water Code section 275, and the public trust doctrine to prevent that unreasonable use.

2. In response to Channelkeeper’s lawsuit, City filed a Cross-Complaint, and later a First Amended Cross-Complaint, against other surface water and groundwater users who it alleged affect the flow of water in the Ventura River. Pursuant to Channelkeeper’s motion, the Court struck City’s First Amended Cross-Complaint. City appealed the decision to strike its First Amended Cross-Complaint, and the Court of Appeal reversed the decision in a published decision. (*Santa Barbara Channelkeeper v. City of San Buenaventura* (2018) 19 Cal.App.5th 1176.)

3. Following the appeal, Channelkeeper filed a First Amended Complaint and Petition (“1st Am. Complaint”). State Board’s Answer to the original Complaint and Petition was deemed its answer to the 1st Am. Complaint. City filed an Answer and a Second Amended Cross-Complaint (“2nd Am. Cross-Complaint”).

1 4. In its 2nd Am. Cross-Complaint, City named approximately one hundred Cross-
2 Defendants who divert water from the Ventura River or pump groundwater from the Upper
3 Ventura River, Ojai Valley, Lower Ventura River, and Upper Ojai Valley Groundwater Basins
4 (collectively “Ventura Groundwater Basins”), which it contends affect the flow of water in the
5 Ventura River. As a water rights adjudication action that includes adjudication of the Ventura
6 Groundwater Basins, the 2nd Am. Cross-Complaint involves, among other things, the
7 Streamlined Groundwater Adjudication Statutes (Civ. Proc. Code, §§ 830-52) and the Sustainable
8 Groundwater Management Act (“SGMA”) (Wat. Code, §§ 10750-37.8).

9 5. Most Cross-Defendants have not yet filed responsive pleadings pursuant to an
10 order by the transferor San Francisco Superior Court, dated November 15, 2018, that extended the
11 time for Cross-Defendants to answer the Cross-Complaint until sixty (60) days after receipt of a
12 Court-approved Form Answer. A Form Answer has not yet been approved by the Court.

13 6. City expects additional parties will join the lawsuit as either cross-defendants or
14 intervenors. Pursuant to Code of Civil Procedure sections 835, 836, subdivision (d), and 836.5,
15 City must provide notice to affected public agencies, California Native American tribes, persons
16 who have a permit or license to store or divert stored water, interested parties who have requested
17 notice from a groundwater management agency, and owners of real property in the Ventura River
18 watershed and Ventura River Groundwater Basins. This last category, in particular, will involve
19 providing notice to hundreds or thousands of additional entities who may become Cross-
20 Defendants. Furthermore, these new parties and named Cross-Defendants may want to sue
21 additional parties. City estimates that it will likely be at least six months before all of these
22 potential additional parties receive notice and appear.

23 7. Channelkeeper, City, State Board, and Cross-Defendants Casitas Municipal Water
24 District, Friend's Ranches, Inc., Krotona Institute of Theosophy, Topa Topa Ranch Company,
25 LLC and The Thacher School, Meiners Oaks Water District and Ventura River Water District,
26 Rancho Matilija Mutual Water Company, Wood-Claeysens Foundation and Department of Fish
27 and Wildlife (collectively “Mediating Parties”), have begun preliminary settlement discussions.

28 8. The Mediating Parties believe that the proposed temporary stay will save the costs

1 and time of engaging in litigation while they are trying to settle the case. At the same time, the
2 matters that are not stayed will assist in ensuring that all of the parties necessary to a settlement
3 will be joined in the lawsuit, the parties have a process to exchange information necessary for
4 settlement discussions, and the case will not be delayed if mediation is unsuccessful.

5
6 TERMS OF STAY

7
8 1. This proceeding shall be stayed, except with respect to:

9 A. The following actions to notify and name any additional parties to this
10 proceeding:

- 11 (1) Motion for approval of notice of adjudication and form answer
12 made pursuant to Code of Civil Procedure section 836;
13 (2) Notice to and service of any and all interested parties to the
14 comprehensive adjudication necessary to establish in rem
15 jurisdiction and the comprehensive effect of the comprehensive
16 adjudication pursuant to Code of Civil Procedure sections 835 and
17 836;
18 (3) Requests for information made pursuant to Code of Civil Procedure
19 section 836.5;
20 (4) Intervention pursuant to Code of Civil Procedure sections 837 and
21 387.5;

22 B. The following actions to exchange information necessary to negotiate the
23 terms of a physical solution:

- 24 (1) Initial disclosures under Code of Civil Procedure section 842.
25 Parties who have appeared in this action and have less than 60 days
26 under section 842 to provide their initial disclosures shall have 60
27 days to do so;
28 (2) The voluntary exchange of information by the Mediating Parties

pursuant to the Memorandum of Understanding agreed to on April 22, 2019;

(3) Information requested pursuant to the California Public Records Act; and

(4) Any other information the parties agree is necessary for settlement discussions;

C. Actions necessary to conduct case management, including but not limited to case management conducted pursuant to Code of Civil Procedure section 840.

2. Any dispute arising from the scope of the stay described in Section 1 above shall be resolved through a request for an informal conference before this Court.

3. The stay shall remain in place as long as the parties determine that settlement discussions continue to be meaningful and productive.

4. The stay may be lifted by the request of any party to this proceeding that is filed with at least fourteen (14) days' notice.

5. The parties expressly reserve and do not waive any and all rights to bring preliminary motions, including, but not limited to, motions to stay pursuant to Water Code section 10737.2 and Code of Civil Procedure section 848, and challenging jurisdiction over surface water users after this temporary stay is lifted.

Dated: August 21, 2019

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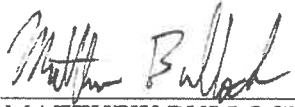
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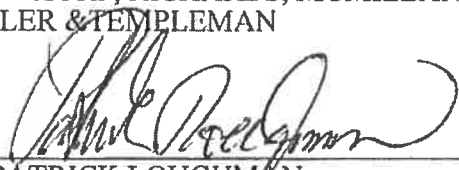
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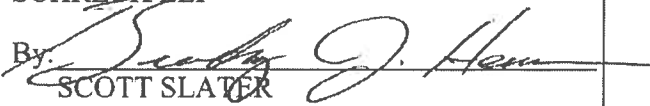
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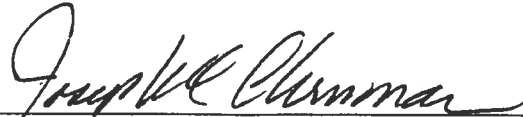
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