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 6 INTEGRITAS OJAI, LLC

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 8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 9 **FOR THE COUNTY OF LOS ANGELES**

10
 11 SANTA BARBARA
 12 CHANNELKEEPER, a California non-
 profit corporation,

13 Plaintiff,

14 v.

15 STATE WATER RESOURCES
 16 CONTROL BOARD, a California State
 Agency; CITY OF SAN
 17 BUENAVENTURA, a California
 Municipal Corporation, incorrectly named
 as City of BUENAVENTURA,

18 Defendants.

19
 20 CITY OF SAN BUENAVENTURA, a
 California Municipal Corporation,

21 Cross-Complaint.

22 v.

23 DUNCAN ABBOTT, an individual, et al.

24 Cross-Defendants.
 25

CASE NO. 19STCP01176

Assigned to:
 Hon. William F. Highberger, Dept. 10

**VERIFIED INITIAL DISCLOSURES OF
 INTEGRITAS OJAI, LLC**

Action Filed: September 9, 2014

VERIFIED INITIAL DISCLOSURES (CCP § 842)

- 1
- 2 **(1) The name, address, telephone number and email address of the party and, if**
3 **applicable, the party's attorney.**

4 Name: Integritas Ojai, LLC;

5 Address: 208 Westminster Avenue, Venice, CA 90291;

6 Attorney Name: Andrew Brady;

7 Address: 550 S. Hope St., Suite 2400, Los Angeles, CA 90071;

8 Telephone Number: (213) 694-3108;

9 Email Address: andrew.brady@us.dlapiper.com.

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

13 The Property owned by Integritas Ojai, LLC at issue in this litigation is located at 2525
14 Gridley Road, Ojai, California. The Property contains two groundwater extraction wells. Precise
15 records of extraction amounts have not been kept, but the wells are estimated to have produced
16 between two and four acre feet per year for each of the last 10 years except 2018 and 2019. The
17 well was not used in 2018 and 2019 due to damage to the Property caused by the Thomas Fire.
18 The Property is not connected to a municipal water supply and is dependent on onsite wells for its
19 water supply.

- 20 **(3) The type of water right or rights claimed by the party for the extraction of**
21 **groundwater.**

22 Overlying and appropriative groundwater rights.

- 23 **(4) A general description of the purpose to which the groundwater has been put.**

24 Domestic, agricultural, and horse keeping.

- 25 **(5) The location of each well or other source through which groundwater has been**
26 **extracted.**

1 The Property contains two groundwater extraction wells. One is located near the site of
2 the existing residential structure on the Property, and a second shared well is located near the
3 main entry gate to the Property off of Gridley Road.

4 **(6) The area in which the groundwater has been used.**

5 The groundwater extracted at the Property has exclusively been used on the Property for
6 domestic, agricultural and horse keeping purposes. In total, the Property is approximately 44
7 acres in size. Between 5-12 acres are used for domestic, irrigation, and horse-keeping purposes.

8 **(7) Any claims for increased or future use of groundwater.**

9 The volume of groundwater used on the Property for agricultural and horse keeping
10 purposes may be increased in coming years as the Property is further repaired following the
11 Thomas Fire and redeveloped.

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

15 Not applicable.

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

18 Not applicable.

19 **(10) The quantity of any replenishment of water to the basin that augmented the
20 basin's native water supply, resulting from the intentional storage of imported or
21 non-native water in the basin, managed recharge of surface water, or return flows
22 resulting from the use of imported water or non-native water on lands overlying
23 the basin by the party, or the party's representative or agent, during each of the
24 10 calendar years immediately preceding the filing of the complaint.**

25 Not applicable.

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

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None, though Integritas Ojai, LLC hereby reserves the right to supplement this and the other information provided in this disclosure.

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

None.

Dated: June 1, 2021

DLA PIPER LLP (US)



By _____
Andrew Brady

Attorneys for Cross-Defendant
INTEGRITAS OJAI, LLC

VERIFICATION

1 I HAVE READ THE FOREGOING INITIAL DISCLOSURES OF CROSS-
2 DEFENDANT INTEGRITAS OJAI, LLC AND KNOW ITS CONTENTS. I AM AN
3 AUTHORIZED REPRESENTATIVE OF INTEGRITAS OJAI, LLC, A PARTY TO THIS
4 ACTION, AND AM EMPOWERED TO MAKE THIS VERIFICATION ON ITS BEHALF,
5 AND I MADE THIS VERIFICATION FOR THAT REASON. I AM INFORMED AND
6 BELIEVE AND, ON THAT GROUND, ALLEGE THAT THE MATTERS STATED IN THE
7 AFOREMENTIONED DOCUMENT ARE TRUE.

8 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
9 OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

10 EXECUTED ON JUNE 1, 2021 AT Ojai, California.



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DAVID DE ROTHSCHILD