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FILED
 Superior Court of California
 County of Los Angeles

MAR 06 2020

Sherri A. [Signature], Executive Officer/Clerk
 By [Signature], Deputy
 Steven Drew

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

11 SANTA BARBARA CHANNELKEEPER, a
 12 California non-profit corporation,
 13
 14 Petitioner,
 15
 16 v.
 17 STATE WATER RESOURCES CONTROL
 18 BOARD, a California State Agency; CITY
 19 OF SAN BUENAVENTURA, a California
 20 municipal corporation, incorrectly named as
 21 CITY OF BUENAVENTURA,
 22
 23 Respondents.

24 CITY OF SAN BUENAVENTURA, a
 25 California municipal corporation,
 26
 27 Cross-Complainant

28 v.
 DUNCAN ABBOTT, an individual, et al.
 Cross-Defendants.

CASE NO. 19STCP01176
 Hon. William F. Highberger

FORM ANSWER

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

By Fax

03/09/2020

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ANSWER TO ADJUDICATION
CROSS-COMPLAINT

The undersigned denies all material allegations in the cross-complaint in this action that seeks to adjudicate rights in the Ventura River Watershed, including its groundwater basins, which are the (1) Upper Ventura River Groundwater Basin (Department of Water Resources’ (“DWR”) Bulletin 118, Groundwater Basin Number 4-3.01); (2) Ojai Valley Groundwater Basin (DWR’s Bulletin 118, Groundwater Basin Number 4-2); (3) Lower Ventura River Groundwater Basin (DWR’s Bulletin 118, Groundwater Basin Number 4-3.02); and (4) Upper Ojai Valley Groundwater Basin (DWR’s Bulletin 118 Groundwater Basin Number 4-1) and asserts all applicable affirmative defenses to that cross-complaint.

Date: March 6, 2020

/s/ Bruce Rothman
Signature

Bruce Rothman
Name – Printed

RDK Land, LLC, A California Limited Liability Company
Cross-Defendant Name

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PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 15301 Ventura Boulevard, Building B, Suite 250, Sherman Oaks, CA 91403.

On March 6, 2020, I served true copies of the following document(s) described as **“FORM ANSWER”** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, postage prepaid, addressed as follows:

Dakotah Benjamin
BEST BEST & KRIEGER, LLP
2001 N. Main Street, Suite 390
Walnut Creek, CA 94596

(Attorneys for City of San Buenaventura)

I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service.

The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of such business.

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

Executed on March 6, 2020, at Sherman Oaks, California.

/s/ David R. Krause-Leemon
David R. Krause-Leemon

Best Best & Krieger
Document Imaging



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