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By: Brigitte De La Rosa, Deputy

11 Attorneys for Respondent and Cross-Complainant
12 CITY OF SAN BUENAVENTURA

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

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

Case No. 19STCP01176

18 Petitioner,

Judge: Honorable William F. Highberger

19 v.

DECLARATION OF SUSAN RUNGREN IN
SUPPORT OF NOTICE OF COMPLETION
OF MAILING CODE OF CIVIL
PROCEDURE, § 836(e)

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

21 Respondents.

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

23 CITY OF SAN BUENAVENTURA, etc.,

24 Cross-Complainant

25 v.

26 DUNCAN ABBOTT, an individual, et al.

27 Cross-Defendants.

DECLARATION OF SUSAN RUNGREN

I, Susan Rungren, declare as follows:

1. I am the General Manager for the Ventura Water Department of the City of San Buenaventura (“City”). I began my career with the City in 1999 as the Utilities Engineer for the City’s Water and Wastewater Divisions and served as the Water Resource Manager for seven years prior to being selected as Assistant General Manager in May 2018, and General Manager in May 2020. I am a licensed Professional Engineer with professional affiliations including the Association of Water Agencies of Ventura County and the Association of California Water Agencies. The following statements are based on my personal knowledge and/or information provided to me by City staff working under my direction, supervision, and control, and, if called upon to testify about them, I could and would do so competently.

2. In January 2020, the City ran an Op Ed in the Ventura County Star giving notice of the 1st round of notices of adjudication in English and Spanish and created a public website with FAQs relating to the January 2, 2020 Third Amended Cross-Complaint.

3. On January 30, February 12, and February 13, 2020, the City held three public meetings in Ojai, Ventura, and Ojai View with a Spanish interpreter available.

4. On or around March 9, 2020, the City posted a website blog about a first round of postcards to inform the public about the latest updates and progress in the case, including the Court’s decision to grant a six-month extension to allow property owners additional time to decide whether or not to file a response. The postcards were mailed on or around March 9, 2020 to all those who received a summons or notice.

5. On or around July 8, 2020, the City mailed another postcard to all those who received a summons or notice and ran additional notices in the Ventura County Star, Ojai Valley News, and Vida (a bilingual publication) in the third and fourth weeks of July 2020.

6. On or around July 16, 2020, the City posted a website blog post about re-commencing notice and service processes, and prepared cover letters to send to all un-served cross-defendants and un-noticed landowners in July 2020 explaining why they were receiving service or notice packets and informing them where they could obtain additional information

1 about the case.

2 7. On or around August 11, 2020, the City posted a website blog regarding re-
3 commencement of the notice and services processes to all unserved cross-defendants and un-
4 noticed landowners.

5 8. In August 2020, the City prepared additional cover letters to send to all un-served
6 cross-defendants and un-noticed landowners explaining why they were receiving service or notice
7 packets and informing them where they could obtain additional information about the case.

8 9. In December 2020, the City prepared additional cover letters to send to all un-
9 served cross-defendants and un-noticed landowners explaining why they were receiving service
10 or notice packets and informing them where they could obtain additional information about the
11 case.

12 10. On or around February 3, 2021, the City posted a website blog post regarding
13 notice and service efforts.

14 11. On or around February 3, 2021, the City prepared another cover letter to send to all
15 unserved cross-defendants explaining why they were receiving service or notice packets and
16 informing them where they could obtain additional information about the case.

17 12. On or around March 15, 2021, the City prepared another cover letter to send to roe
18 cross-defendants explaining why they were receiving service or notice packets and informing
19 them where they could obtain additional information about the case.

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

22 Executed on April 14, 2021 in Ventura, California.

23
24
25 
26 SUSAN RUNGREN
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