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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 CHANNELKEEPER,
a California non-profit corporation,

12 Petitioner,
13

14 v.

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

17 Respondents.
18

19 CITY OF SAN BUENAVENTURA,
a California Municipal Corporation,

20 Cross-Complainant,
21

22 v.

23 DUNCAN ABBOTT, an individual, et al.

24 Cross-Defendants.
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27
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CASE NO. 19STCP01176

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

**VERIFIED FORM ANSWER OF
INTEGRITAS OJAI, LLC TO THIRD
AMENDED ADJUDICATION CROSS-
COMPLAINT**

Action Filed: September 9, 2014


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VERIFIED FORM 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 groundwater basins, which are the: (1) Upper Ventura River Groundwater Basin (California Department of Water Resources (“DWR”) Bulletin 118, Groundwater Basin Number 4-3.01); (2) Ojai Valley Groundwater Basin (DWR Bulletin 118 Groundwater Basin Number 4-2); (3) Lower Ventura River Groundwater Basin (DWR Bulletin 118, Groundwater Basin Number 4-3.02); and (4) Upper Ojai Valley Groundwater Basin (DWR Bulletin 118 Groundwater Basin Number 4-1), and asserts all applicable affirmative defenses to that cross-complaint.

Dated: March 2, 2020

DLA PIPER LLP (US)

By 
Andrew Brady

Attorneys for Cross-Defendant
INTEGRITAS OJAI, LLC


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VERIFICATION

I have read the foregoing Answer of Cross-Defendant Integritas Ojai, LLC to the Third Amended Adjudication Cross-Complaint and know its contents. I am an authorized representative of Integritas Ojai, LLC, a party to this action, and am empowered to make this verification on its behalf, and I made this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the aforementioned document are true.

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

Executed on February 27, 2020 at Los Angeles, California.



DAVID DE ROTHSCHILD

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PROOF OF SERVICE

I, Joy Ryan, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is DLA Piper LLP (US), 550 South Hope Street, Suite 2400, Los Angeles, California 90071-2618. On March 2, 2020, I served a copy of the within document(s):

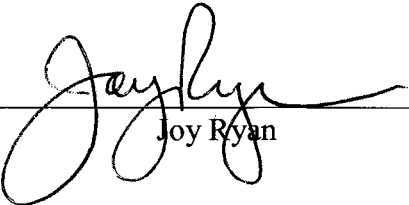
VERIFIED ANSWER OF INTEGRITAS OJAI, LLC TO THIRD AMENDED ADJUDICATION CROSS-COMPLAINT

(BY E-SERVICE) I transmitted a copy of the foregoing document(s) to the interested parties in this action by submitting an electronic version of the document(s) via **File & ServeXpress**.

SEE ATTACHED SERVICE LIST

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

Executed on March 2, 2020, at Los Angeles, California.



Joy Ryan

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