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Superior Court of California
County of Los Angeles

JUN 25 2021

Sherri B. Carter, Executive Officer/Clerk of Court
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CITY OF SAN BUENAVENTURA

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

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

Case No. 19STCP01176

17
18 Petitioner,

Judge: Hon. William F. Highberger

19 v.

RESPONDENT AND CROSS-
COMPLAINANT CITY OF SAN
BUENAVENTURA'S INITIAL LIST OF
DOCUMENTS SUPPORTING
INTERCONNECTIVITY SUBMITTED AT
THE REQUEST OF THE COURT

20 STATE WATER RESOURCES CONTROL
BOARD, et al.,

21 Respondents.

22
23 CITY OF SAN BUENAVENTURA, et al.,

Action Filed: Sept. 19, 2014
Trial Date: February 14, 2022

24 Cross-Complainant,

25 v.

26 DUNCAN ABBOTT, an individual, et al.,

27 Cross-Defendants.
28

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06/29/2021

1 In accordance with the Court’s request at the June 21, 2021 Status Conference,
2 Respondent and Cross-Complainant City of San Buenaventura (City) submits the following initial
3 list of documents and presentations that support interconnection between groundwater and surface
4 water in the Ventura River Watershed. The City is providing this information at the request of
5 the Court and without prejudice to the City’s ability to add, subtract, or delete references in the
6 future, and without, in any manner, waiving any privileges that exist regarding the City’s expert
7 testimony or information. The City reserves all of its rights regarding the issues to be heard in the
8 Phase One trial and provides this list of existing documents to the Parties pursuant to the Court’s
9 request.

10 1. California Department of Water Resources (DWR), Statement of Findings
11 Regarding the Disapproval of the Ojai Valley Alternative, November 12, 2019, with Exhibit A -
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6 5. Daniel B. Stephens & Associates, Inc., Groundwater Budget and Approach to a
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13 via Zoom, available at [https://uvrgroundwater.org/wp-content/uploads/2021/04/20210302-](https://uvrgroundwater.org/wp-content/uploads/2021/04/20210302-UVRGA-Workshop-No-3_low_res.pdf)
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27 [manage2.com/track/click?u=23ecb819d89925323a8b96d15&id=68bd89e12a&e=b77285f3f6,](http://venturawatershed.us4.list-manage2.com/track/click?u=23ecb819d89925323a8b96d15&id=68bd89e12a&e=b77285f3f6)
28 quoting Los Angeles Regional Water Quality Control Board, Ventura River Watershed.

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21
22 Dated: June 25, 2021

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PROOF OF SERVICE

I am a resident of the State of California and over the age of eighteen years, and not a party to the action herein; my business address is Best Best & Krieger LLP, 2001 N. Main Street, Suite 390, Walnut Creek, CA 94596. On June 25, 2021, I served the following document(s):

RESPONDENT AND CROSS-COMPLAINANT CITY OF SAN BUENAVENTURA'S INITIAL LIST OF DOCUMENTS SUPPORTING INTERCONNECTIVITY SUBMITTED AT THE REQUEST OF THE COURT

- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Walnut Creek, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business.
- I caused such envelope to be delivered via overnight delivery. Such envelope was deposited for delivery by United Parcel Service following the firm's ordinary business practices.
- by transmission via **E-Service to File & ServeXpress** to the person(s) set forth below. Local Rules of Court 2.10 (P).
- By e-mail or electronic transmission.** I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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Robert Smith, Trustee of the Charles R. Rudd
and Lola L. Rudd Trust, dated May 20, 2976;
Shlomo Raz; Sylvia Raz; Senior Canyon
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N. Hartmann Trust; Gary Hirschcron; Cheryl
Jensen; Lutheran Church of the Holy Cross of
Ojai, California; Janice Sattler (Mineo); Eitan
Sloustcher; Rogers-Cooper Memorial
Foundation; Robert Norris (not yet appeared);
Patricia Norris; Old Creek Road Mutual
Water Company (not yet appeared); Margaret
Vanderfin; Telos Ojai, LLC (not yet
appeared); Jennifer Ware; The Walker Jr.
Living Trust; David Altman, Trustee of the
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Sean A. Bennett and Leslie Bennett, Trustees
of the Bennett Family Trust; Dwayne A.
Bower and Marilyn E. Bower Trustees of the

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Bower Family Trust; Mark Terry Cline and Bonnie Burreson Cline, Trustees of the Mark Terry Cline and Connie Burreson Cline Revocable Trust; Robert R. Daddi and Darlene J. Daddi; Lucille A. Elrod, Trustee of the John and Lucille Elrod Family Trust; Friend's Stable & Orchard Inc. Daniel Hultgen, Trustee of the Hultgen Living Trust; Ojai Golf, LLC; Three Oaks, LLC, Erica J. Abrams, Trustee of the Erica J. Abrams Trust; Raul E. Alvarado and Hildegard M. Alvarado, Trustees of the Alvarado Family Trust; William Armstrong and April Nardini; Joseph Lynn Barthelemy and Elvira Lilly Barthelemy, Trustees of the Joseph Lynn Barthelemy and Elvira Lilly Barthelemy 2002 Family Trust; James S. Bennett and Carolyn D. Bennett, Trustees of the Bennett Family Trust; Sumeet Bhatia and Michael McDonald; John Joseph Broesamle and Katharine Sue Broesamle, Trustees of the Broesamle Family Trust; Richard Aaron Carlson, Trustee of the Richard Aaron Carlson Trust and Michelle Larson, Trustee of the Michelle Larson Family Trust; Thomas D. Carver and Cynthia L. Carver; Dana Cenicerros, Trustee of the Dana and Dawn Cenicerros Revocable Living Trust; Deborah Lys Martin Crawford; Frank Clay Creasey Jr.; Debra Joy Reed, Trustee of The Debra Joy Reed Revocable Trust Dated November 3, 1994; Frederic Devault; Diana Syvertson, Trustee of the Diana Syvertson Living Trust; Dive Deep L.L.C.; Douglas Roy Parent and Ann Marie Parent; William Erickson; Gelb Enterprises, L.P.; Jan Stephen Granade and Priscilla K. Granade, Trustees of the Granade Family Revocable Living Trust; Margot J. Griswold; Brian C. Haase and Marie Haase, Trustees of the B&M Haase Trust Dated October 8, 2019; Thomas Lann Harper and Jadona Collier-Harper; Ojai-Jackman L.L.C.; Kevin Rainwater and Marianne Ratcliff; Keith M. Nightingale and Victoria V. Nightingale, Trustees of The Nightingale Family Trust; Heide C. Kurtz, Trustee of The Kurtz Family Trust Dated January 19, 2019; Randall Leavitt, Trustee of The Randall B. Leavitt 2010 Trust; Edward C. Leicht and Jacqueline M. Leicht, Trustees of The Leicht Family 2013 Revocable Trust Dated March 1, 2013; Paul Lepiane and Bengtson Bo; Robert Levin and Lisa Solinas, Trustees of The Levin Family Living Trust; Francis Longstaff and Shauna Longstaff, Trustees of The Longstaff Trust Dated

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October 11, 2018; Mandy Macaluso, Trustee of The Living Trust of Mandy Macaluso; Marilyn Wallace, Trustee of The Marilyn Wallace Separate Property Trust; Daniel J. McSweeney and Yoko McSweeney; Wendell M. Mortensen and Laura L. Mortensen, Trustees of The Mortensen Family Revocable Trust; Timothy Jerome Murch and Jody Caren Murch, Trustees of The Jodim Family 2007 Trust Dated July 31, 2007; Chris E. Platt and Hanh H. Platt; Robert Erickson, Trustee and Ronald Wilson; Michael D. Robertson and Kimberly A. Robertson, Trustees of The Robertson Family Trust; James P. Robie, Trustee of the Robie Family Trust; Petter Romming and Kimi Romming, Trustees; Marc Saleh, Trustee of The Saleh Family Trust; Konrad Stefan Sonnenfeld, Trustee of The Konrad Stefan Sonnenfeld Living Trust; Mark Sutherland, Trustee of The Sutherland Marital Trust; John H. Thacher and Caroline H. Thacher, Trustees of The Thacher Family Trust Dated January 2004; Gilbert G. Vondriska and Carolyn J. Vondriska, Trustees of The Vondriska Living Trust; William D. Rusin, Sr., Trustee of the William D. Rusin Sr. Revocable Trust; Oscar D. Acosta, Trustee of the Acosta Trust; Chris E. Platt and Hanh H. Plat; Deborah Lys Martin Crawford; Diane Syvertson, Trustee of the Diana Syvertson Living Trust; Erica J. Abrams, Trustee of the Erica J. Abrams Trust; Frank Clay Creasey Jr.; Frederic DeVault; Gilbert G. Vondriska and Carolyn J. Vondriska, Trustees of the Vondriska Living Trust; James P. Robie, Trustee of the Robie Family Trust; John H. Thacher and Caroline H. Thacher, Trustees of the Thacher Family Trust dated January 2004; Mandy Macaluso, Trustee of the Living Trust of Mandy Macaluso; Margot J. Griswold; Mark Sutherland, Trustee of the Sutherland Marital Trust; Randall Leavitt, Trustee of the Randall B. Leavitt 2010 Trust; Raul E. Alvarado and Hildegard M. Alvarado, trustees of the Alvarado Family Trust; Sumeet Bhatia and Michael McDonald; Timothy Jerome Murch and Jody Caren Murch, Trustees of the Jodim Family 2007 Trust dated July 31, 2007; Wendell M. Mortensen and Laura L. Mortensen, Trustees of the Mortensen Family Revocable Trust; Petter Romming and Kimi Romming, Trustees; William Armstrong and April Nardini; William Erickson; Rancho Sueño, LLC

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

26 Executed on June 25, 2021 at Walnut Creek, California

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28 Irene Islas