

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

1
2
3
4 DEPARTMENT 10 HON. WILLIAM F. HIGHBERGER, JUDGE
5 SANTA BARBARA CHANNELKEEPER,)
6)
7)
8)
9)
10)
11)
12)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

PLAINTIFF,)
VS.) CASE NO.
STATE WATER RESOURCES CONTROL) 19STCP01176
BOARD, ET AL.,)
DEFENDANTS.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS
FEBRUARY 27, 2020

APPEARANCES:

FOR THE PLAINTIFF:

COOPER & LEWAND-MARTIN, INC.
BY: DANIEL COOPER, ESQ.
(APPEARED VIA COURT CALL)
1004 O'REILLY AVENUE
SAN FRANCISCO, CALIFORNIA 94129
415.360.2962
DANIEL@COOPERLEWAND-MARTIN.COM

FOR THE CROSS-DEFENDANT THE CITY OF OJAI:

BARTKIEWICZ, KRONICK & SHANAHAN, P.C
BY: JENNIFER T. BUCKMAN, ESQ.
(APPEARED VIA COURT CALL)
1011 22ND STREET
SACRAMENTO, CALIFORNIA 95816
916.446.4254
JTB@BKSLAWFIRM.COM

AURORA BOWSER, CSR NO. 12801,
OFFICIAL REPORTER PRO TEMPORE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

APPEARANCES CONTINUED:
FOR THE CROSS-DEFENDANT CITY OF SAN BUENAVENTURA:
BEST, BEST & KRIEGER LLP
BY: SHAWN D. HAGERTY, ESQ.
655 WEST BROADWAY
15TH FLOOR
SAN DIEGO, CALIFORNIA 92101
619.525.1300
SHAWN.HAGERTY@BBKLAW.COM
FOR THE DEFENDANT CITY OF SAN BUENAVENTURA:
BEST BEST & KRIEGER LLP
BY: CHRISTOPHER M. PISANO, ESQ.
300 SOUTH GRAND AVENUE
25TH FLOOR
LOS ANGELES, CALIFORNIA 90071
213.617.8100
CHRISTOPHER.PISANO@BBKLAW.COM
FOR THE CROSS-DEFENDANTS BECKER, JANET BOULTEN, MICHAEL
BOULTEN, MICHAEL CALDWELL, JOE CLARK:
BLATZ LAW FIRM
BY: PAUL B. BLATZ, ESQ.
(APPEARED VIA COURT CALL)
206 NORTH SIGNAL STREET
SUITE G,
OJAI, CALIFORNIA 93023
805.418.3110
BLATZLAWFIRM@GMAIL.COM
FOR THE CROSS-DEFENDANT THE WOOD-CLAEYSSSENS FOUNDATION,
TAYLOR RANCH:
BROWNSTEIN HYATT FARBER SCHRECK
BY: BRADLEY J. HERREMA, ESQ.
2049 CENTURY PARK EAST
SUITE 3550
LOS ANGELES, CALIFORNIA 90067
310.500.4600
BHERREMA@BHFS.COM
FOR THE CROSS-DEFENDANT CASITAS MUNICIPAL WATER
DISTRICT:
RUTAN & TUCKER LLP
BY: DAVID B. COSGROVE, ESQ.
611 ANTON BOULEVARD
SUITE #1400
COSTA MESA, CALIFORNIA 92626
714.641.3419
DCOSGROVE@RUTAN.COM

1 APPEARANCES CONTINUED:
2 FOR THE CROSS-DEFENDANT CALIFORNIA DEPARTMENT OF FISH
AND WILDLIFE:

3
4 STATE OF CALIFORNIA
DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
5 BY: NOAH GOLDEN KRASNER, ESQ.
300 SOUTH SPRING STREET
6 SUITE 1702
LOS ANGELES, CALIFORNIA 90013
7 213.269.6343
NOAH.GOLDENKRASNER@DOJ.CA.GOV

8 FOR THE RESPONDENT STATE WATER RESOURCES CONTROL BOARD:

9
10 STATE OF CALIFORNIA
DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
11 BY: MARC N. MELNICK, ESQ.
1515 CLAY STREET
12 20TH FLOOR
OAKLAND, CALIFORNIA 94612
13 510.879.0750
MARC.MELNICK@DOJ.CA.GOV

1 CASE NUMBER: 19STCP01176
2 CASE NAME: SANTA BARBARA CHANNELKEEPER
3 VS. STATE WATER RESOURCES
4 CONTROL BOARD
5 LOS ANGELES, CALIFORNIA THURSDAY, FEBRUARY 27, 2020
6 DEPARTMENT: 10 HON. WILLIAM F. HIGHBERGER
7 APPEARANCES: (AS HERETOFORE NOTED.)
8 REPORTER: AURORA BOWSER, CSR NO. 12801
9 TIME: 1:47 P.M.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

---000---

THE COURT: STCP01176, SANTA BARBARA
CHANNELKEEPER VERSUS STATE WATER RESOURCES CONTROL
BOARD. DO I HAVE COUNSEL FOR SANTA BARBARA
CHANNELKEEPER WITH US ON THE PHONE THIS AFTERNOON?

MR. COOPER: YES, YOUR HONOR. THIS IS DANIEL
COOPER FOR CHANNELKEEPER.

THE COURT: GREETINGS. HERE IN COURT IN
PERSON SITTING AT THE COUNSEL TABLE?

MR. HAGERTY: YOUR HONOR, SHAWN HAGERTY FOR
THE CITY OF SAN BUENAVENTURA. WITH ME TODAY IS CHRIS
PISANO, MY COLLEAGUE.

MR. COSGROVE: GOOD AFTERNOON, YOUR HONOR.
DAVID COSGROVE WITH RUTAN & TUCKER FOR CASITAS
MUNICIPAL WATER DISTRICT.

MR. HERREMA: GOOD AFTERNOON, YOUR HONOR.
BRAD HERREMA FROM BROWNSTEIN HYATT FARBER AND SCHRECK
ON BEHALF OF THE WOOD-CLAEYSSSENS FOUNDATION.

1 MR. MELNICK: GOOD AFTERNOON, YOUR HONOR.
2 MARC MELNICK FROM THE ATTORNEY GENERAL'S OFFICE ON
3 BEHALF OF THE STATE WATER RESOURCES CONTROL BOARD.

4 MR. KRASNER: GOOD AFTERNOON, YOUR HONOR.
5 NOAH GOLDEN KRASNER FOR THE DEPARTMENT OF FISH AND
6 WILDLIFE.

7 THE COURT: GREETINGS. COUNSEL ON THE PHONE,
8 IF YOU FIND OCCASION THAT YOU WANT TO SPEAK, PLEASE
9 GIVE YOUR NAME. AND IF MULTIPLE PEOPLE SPEAK ON THE
10 PHONE, YOU'LL PROBABLY HAVE TO GIVE YOUR NAME EACH
11 TIME.

12 BUT I DON'T THINK WE NEED TO SPEND THE TIME IT
13 WOULD TAKE TO CHECK IN ON THE RECORD FOR THOSE OF YOU
14 JOINING US ON THE PHONE, SINCE YOUR NAMES WILL APPEAR
15 IN THE MINUTE ORDER.

16 I HAVE REVIEWED THE JOINT REPORT FILED BY THE
17 CITY OF SAN BUENAVENTURA ON FEBRUARY 20TH. IT'S
18 UNILATERAL IN SOME SENSE. BUT IT DOES SHOW INTERACTION
19 WITH ALL THE OTHER INTERESTED PARTIES. SO IN THAT
20 SENSE, IT'S JOINT.

21 I WILL LET SOMEBODY CORRECT ME IF I'M WRONG,
22 BUT I BELIEVE THE THREE REQUESTS THAT I'VE GOTTEN, TWO
23 FROM VENTURA CITY, AND ONE FROM OJAI, FOR EXTENSIONS OF
24 DEADLINES TO FILE CERTAIN PAPERWORK, ARE UNOPPOSED.

25 AND THE REQUEST OF THE CITY OF OJAI, I
26 BELIEVE, IS REDUNDANT TO -- OTHERWISE IDENTICAL TO THE
27 REQUEST FROM THE CITY OF VENTURA. DO YOU AGREE,
28 MR. HAGERTY?

1 MR. HAGERTY: YES, YOUR HONOR.

2 THE COURT: DO I HAVE COUNSEL ON THE PHONE FOR
3 CITY OF VENTURA?

4 MR. HAGERTY: CITY OF OJAI, YOUR HONOR?

5 THE COURT: CITY OF OJAI.

6 MS. BUCKMAN: YES, YOUR HONOR.

7 THE COURT: NAME?

8 MS. BUCKMAN: JENNIFER BUCKMAN SPECIALLY
9 APPEARING FOR CITY OF OJAI.

10 THE COURT: FAIR ENOUGH. DO YOU CONCUR WITH
11 WHAT I JUST SAID ABOUT THE STATUS OF THE EX PARTIES,
12 MA'AM?

13 MS. BUCKMAN: WE DO, YOUR HONOR.

14 THE COURT: OKAY. ALL THREE EX PARTES ARE
15 THEREFORE GRANTED. I BELIEVE WE HAD --

16 MR. OSIAS: THIS IS DAVID OSIAS. HAVE WE LOST
17 THE COURT?

18 THE COURT: NO. I WENT DOWN TO COUNSEL TABLE
19 TO SIGN THE PAPERWORK I NEED TO SIGN. I NOW HAVE IT.
20 MR. HAGERTY, THE EX PARTE FOR VENTURA SEEMS TO SEEK THE
21 SAME RELIEF AS THE EX PARTE FOR THE CITY OF OJAI.
22 SHOULD I BE SIGNING BOTH OF THEM TO ACCOMPLISH THE
23 DESIRE TO RESOLVE?

24 MR. HAGERTY: YOUR HONOR, THERE IS A SLIGHT
25 DIFFERENCE, THAT I DON'T THINK IS MATERIAL, BUT I THINK
26 IS IMPORTANT TO CLARIFY. OUR PREFERENCE WOULD BE THAT
27 YOU USE THE ONE WE SUBMITTED.

28 THE DIFFERENCE IS THAT WE THINK IT'S JUST MORE

1 EFFICIENT TO HAVE A DATE CERTAIN. AND WE'VE PROPOSED A
2 DATE CERTAIN IN THE DOCUMENTS THAT WE'VE SUBMITTED.
3 THAT IS SEPTEMBER 8TH, 2020, WHICH WOULD BE SIX MONTHS
4 FROM THE DATE THAT RESPONSES WERE OTHERWISE DUE.

5 OJAI IS A LITTLE DIFFERENT. AND I THINK IT
6 WOULD BE THE MOST EFFICIENT TO HAVE A DATE CERTAIN.
7 BECAUSE OTHERWISE, WE WOULD GET MULTIPLE REQUESTS IN
8 TERMS OF WHEN SERVICE OCCURRED AND HOW MUCH TIME PEOPLE
9 HAVE.

10 SO IT WOULD BE OUR PREFERENCE IF -- AND WE
11 SUPPORT OJAI'S REQUEST AS WELL. BUT WE JUST THINK IT
12 WOULD BE MORE EFFICIENT TO HAVE A SPECIFIC DATE OF
13 SEPTEMBER 8TH, 2020, WHICH IS WHAT WE'VE ASKED FOR.

14 THE COURT: MS. BUCKMAN, FOR THE CITY OF OJAI,
15 ARE YOU AGREEABLE IF I SIMPLY ADOPT VENTURA'S FORM, BUT
16 LET THAT ESSENTIALLY MANIFEST THE SAME RELIEF THAT YOU
17 WANTED?

18 MS. BUCKMAN: YES, YOUR HONOR. WE ARE
19 AMENABLE TO THAT.

20 THE COURT: OKAY. SO THE MINUTE ORDER WILL
21 INDICATE THAT THE COURT GRANTS THE EX PARTE REQUEST OF
22 OJAI. BUT THE ORDER THAT'S SIGNED FOR THE BENEFIT OF
23 VENTURA ON ITS MOTION, WILL CONTROL IN LIEU OF THE
24 ORDER SUBMITTED BY OJAI, IN ORDER TO ALLOW THE EX PARTE
25 TO BE FILED.

26 IN LIEU OF SIGNING WHERE THE ORDER WOULD
27 OTHERWISE BE SHOWN, I WILL IN LIEU OF MY SIGNATURE SAY
28 "SEE ORDER ON CONCURRENT EX PARTE. GRANTED EX PARTE OF

1 CITY OF" -- DO YOU TAKE OFFENSE IF I JUST SAY
2 "VENTURA"?

3 MR. HAGERTY: NO. WE PREFER THAT, FOR
4 SIMPLICITY OF THE MOMENT.

5 THE COURT: BUT THEY DON'T CHOOSE TO LEGALLY
6 RENAME THEMSELVES?

7 MR. HAGERTY: CORRECT.

8 THE COURT: SO IN LIEU OF SIGNATURE I SAY,
9 "SEE ORDER ON CONCURRENT EX PARTE OF CITY OF VENTURA
10 GRANTED TODAY ON THE OJAI APPLICATION, WHICH CAN
11 OTHERWISE BE FILED."

12 AND THEN ON THE VENTURA REQUEST, I WILL TICK
13 THE BOX FOR ORDER IN THE CAPTION PAGE. SO SINCE I'M
14 AGREEABLE TO IT. AND WE'LL SIGN THAT UNDER TODAY'S
15 DATE.

16 ANY OTHER BLANKS NEED TO BE FILLED IN,
17 MR. HAGERTY?

18 MR. HAGERTY: NO, YOUR HONOR.

19 THE COURT: TURNING NOW TO THE PAPERWORK ON
20 THE EX PARTE AS TO THE PROOF OF SERVICE, WHICH IS FOR
21 THE BENEFIT OF THE CITY OF OJAI. MARCH 2 IS THE NEW
22 COMPLIANCE DEADLINE?

23 MR. HAGERTY: YOUR HONOR, THE CURRENT
24 DEADLINE. YES. AND WE'RE ASKING FOR MAY 1, YOUR
25 HONOR.

26 THE COURT: WHERE DOES THAT MANIFEST IN THE
27 FORM?

28 MR. HAGERTY: IT SHOULD BE THE NEXT PAGE.

1 THERE.

2 THE COURT: OKAY. SO THE THREE EX PARTES ARE
3 RESOLVED.

4 MR. HAGERTY: FIRST, YOUR HONOR, THERE ARE
5 FOUR OTHER RELATIVELY MINOR ITEMS THAT I CAN TICK
6 THROUGH VERY QUICKLY, IF IT PLEASE THE COURT.

7 THE COURT: ARE SOME OF THEM GOING TO BE
8 INCORPORATED IN THE PROPOSED ORDER AFTER STATUS
9 CONFERENCE?

10 MR. HAGERTY: YES, YOUR HONOR.

11 THE COURT: SO FAR EVERYTHING SEEMS
12 REASONABLE, SUBJECT TO THE NITPICKS THAT I PUT UP ON
13 THE POSTING YESTERDAY ABOUT THE NEED TO GIVE A
14 USER-FRIENDLY COURT-APPROVED ANSWER FOR NAMED RIPARIAN
15 OWNERS, A CAPTION TITLE THAT IS NOT IDENTICAL TO THE
16 "FORM ANSWER" THAT IS ALLOWED TO THE PARTIES NOT YET
17 NAMED BUT SERVED AS INTERESTED GROUNDWATER OWNERS; SO
18 THAT THE INTAKE PROCESS IN THE CLERK'S OFFICE CAN
19 READILY DISTINGUISH BETWEEN THE TWO TYPES OF LITIGANTS
20 WHO ARE APPEARING.

21 MR. HAGERTY: WE AGREE, YOUR HONOR. AND OUR
22 PROPOSAL WOULD BE, AFTER THE HEARING TODAY, WE WOULD
23 SUBMIT A PROPOSED ORDER. INCLUDED WITH THAT, WOULD BE
24 A PROPERLY-CAPTIONED FORM, SO THAT THE COURT HAS IT
25 BEFORE IT TAKES ACTION.

26 AND THEN WE WOULD POST THAT ON OUR WEBSITE.
27 WE ALREADY HAVE THE FORM ANSWER POSTED. IT WOULD BE A
28 SEPARATE POSTING. SO IT WOULD BE VERY CLEAR THAT IF

1 YOU WERE A RIPARIAN AND WISH TO USE A FORM ANSWER, THIS
2 IS THE ONE YOU WOULD USE. SO WE WOULD TAKE CARE OF ALL
3 THAT THROUGH THE ORDER.

4 THE COURT: ANYBODY OBJECT? NO OBJECTION FOR
5 THE RECORD.

6 MR. OSIAS: I'M SORRY, YOUR HONOR.

7 THE COURT: SPEAK UP. WHO IS THIS?

8 MR. OSIAS: YOUR HONOR, THIS IS DAVID OSIAS
9 FOR A PARTY THAT HAS NOT YET APPEARED.

10 THE COURT: MR. OSIAS, YOU'RE SPECIALLY
11 APPEARING, OR YOU'RE JUST AN INTERESTED MEMBER OF THE
12 PUBLIC?

13 MR. OSIAS: NO. NO. I HAVE A CLIENT WHO IS
14 NOT YET MAKING APPEARANCE IN THE CASE.

15 THE COURT: I'M NOT ASKING YOU TO GIVE A NAME.
16 SO THAT'S ALL RIGHT. I WON'T CONSTRUE THIS AS AN
17 APPEARANCE.

18 MR. OSIAS: THANK YOU. MY QUESTION MERELY IS,
19 IF THE LANDOWNER IS UNCERTAIN WHETHER THE RIGHTS WOULD
20 ULTIMATELY BE CLASSIFIED AS OVERLYING GROUNDWATER OR,
21 RIPARIAN, DOES THE CHOICE HAVE A FORM HAVE ANY
22 SIGNIFICANCE FOR THEM, OR IS IT MERELY FOR FILING
23 PURPOSES?

24 THE COURT: DO YOU HAVE A SENTIMENT,
25 MR. HAGERTY, BEFORE I SPEAK?

26 MR. HAGERTY: YOUR HONOR, I WOULD BE HAPPY TO
27 TALK TO MR. OSIAS. I'VE TALKED TO HIM ALREADY. I'M
28 CERTAIN WE CAN WORK OUT THE DETAILS OF THE APPROPRIATE

1 FORM TO USE.

2 SO I'M NOT SURE WE NEED TO FULLY RESOLVE THAT
3 HERE. BUT I'M HAPPY TO WORK WITH HIM ON THAT.

4 THE COURT: I WOULD VOLUNTEER THESE COMMENTS,
5 MR. OSIAS. THE UNIVERSE OF NEW CROSS-DEFENDANTS WHO'VE
6 BEEN NAMED IS A DEFINED SET. IT'S A LONG CAPTION PAGE,
7 BUT THOSE NAMES ARE OUT THERE.

8 MR. OSIAS: RIGHT.

9 THE COURT: AND IF THE CLIENTS WHO ARE
10 REPRESENTING FINDS HIMSELF, HERSELF, OR ITSELF IN THAT
11 LIST, THEY SHOULD NOT USE THE "FORM ANSWER" INTENDED
12 FOR PEOPLE WHOSE RIGHTS ARE LIMITED TO GROUNDWATER, AND
13 INSTEAD SHOULD GIVE US A FORM THAT MATCHES THE STATUS
14 OF THE NAMED PARTY.

15 IF YOU HAVE A CLIENT WHO HAS NOT BEEN LISTED,
16 BECAUSE THE CITY OF VENTURA DID NOT RECEIVE THAT PERSON
17 TO HAVE RIPARIAN RIGHTS, AND INSTEAD GAVE NOTICE TO
18 THAT PERSON ONLY AS A GROUNDWATER-ONLY INTERESTED OR
19 POTENTIALLY INTERESTED PARTY THOUGH NOT NAMED; BUT THAT
20 PARTY BELIEVES THAT DUE TO A TRICKLE OF WATER THAT RUNS
21 ACROSS OR ON THE EDGE OF HIS, HER, OR ITS FEE SIMPLE,
22 THAT THERE ARE IN TRUTH RIPARIAN RIGHTS AT ISSUE.

23 I GUESS ONE WOULD PROBABLY -- I DON'T KNOW
24 THAT YOU HAVE TO MAKE A MOTION TO INTERVENE. BUT IN
25 THE USE OF A FORM ANSWER, WOULD YOU WANT TO SAY
26 SOMETHING THAT CLEARLY SCREAMS OUT, I THINK I'M A
27 RIPARIAN OWNER AND WAS LEFT OFF THE CAPTION, IDEALLY TO
28 MR. HAGERTY, AND ASKING HIM TO AMEND THE CAPTION TO

1 NAME YOUR CLIENT.

2 DOES THAT ANSWER YOUR QUESTION, MR. OSIAS?

3 MR. OSIAS: IT DOES. I ACTUALLY HAD A SIMPLE
4 PROPOSAL ALONG YOUR LINES, WHICH IS WE'LL USE THE FORM
5 ANSWER THAT'S DESIGNATED; BUT IF WE NEED TO RESERVE
6 ANYTHING, WE'LL ADD A SENTENCE AT THE END SAYING
7 "RESERVING THE RIGHT TO AMEND SHOULD FACTS PROVE
8 OTHERWISE" -- OR WHATEVER.

9 I WILL WORK THAT OUT WITH --

10 THE COURT: WHICH PRESUMABLY BE ON ACCOUNT OF
11 THE FACT THAT BELIEVE YOU ACTUALLY HAVE SOME RIPARIAN
12 RIGHTS AT RISK AND ARE NOT A GROUNDWATER-ONLY
13 INTERESTED PARTY.

14 MR. OSIAS: RIGHT. IF IT TURNS OUT TO BE THE
15 CASE. WE'RE STILL INVESTIGATING A LITTLE BIT. BUT I
16 APPRECIATE TAKING UP ENOUGH OF YOUR TIME TODAY.

17 THE COURT: NO PROBLEM. ANYBODY ELSE WHO
18 WISHES TO SPEAK?

19 MR. BLATZ: YOUR HONOR, RYAN BLATZ FOR A
20 NUMBER OF CROSS-DEFENDANTS.

21 JUST TO FOLLOWUP ON THAT QUESTION, LOTS OF
22 PROPERTIES WERE SERVED WITH BOTH A NOTICE AND A
23 SUMMONS. SO IT'S BEEN A LITTLE INCONSISTENT AND
24 CONVOLUTED, AS FAR AS THE FORM ANSWER WITH THAT. I
25 WANT TO MAKE SURE THAT WE'RE STREAMLINING EVERYTHING ON
26 OUR END TO MAKE IT EASIEST FOR THE COURT AS POSSIBLE.

27 BUT FOR THOSE INDIVIDUALS WHO HAVE BEEN SERVED
28 BOTH, WOULD THEY NEED TO FILE SEPARATE ANSWERS; OR IF

1 THEY BELIEVE THEY HAVE BOTH RIGHTS, THE RIPARIAN AND
2 GROUNDWATER, WOULD THEY JUST FILE AS ONE? OR IS THERE
3 A WAY THE COURT WOULD DESIRE THE FORM ANSWER TO BE
4 WRITTEN TO MAKE SURE IT'S DONE AS EFFICIENTLY AS
5 POSSIBLE?

6 THE COURT: BEAR WITH ME. DO YOU WANT TO GO
7 FIRST, MR. HAGERTY?

8 MR. HAGERTY: I WOULD, SORT OF, HAVE THE SAME
9 RESPONSE. RYAN BLATZ AND I CAN TALK ABOUT THIS AND
10 WORK OUT THE DETAILS. WE TRY TO BE VERY CAREFUL. BUT
11 IT'S NOT A PERFECT WORLD OF NOTICING PEOPLE. IF PEOPLE
12 WERE BOTH OVERLYING AND RIPARIAN, THEN THEY SHOULD HAVE
13 BEEN SERVED.

14 THE COURT: ONLY?

15 MR. HAGERTY: CORRECT, YOUR HONOR. WE WANTED
16 TO AVOID THE CONFUSION THAT MR. BLATZ HAS INDICATED MAY
17 HAVE OCCURRED. AGAIN, WE'RE OPEN. WE HAVE PEOPLE WHO
18 WILL HAPPILY TALK TO MR. BLATZ. I THINK WE CAN WORK
19 OUT AN ARRANGEMENT.

20 EITHER OF THE FORM ANSWERS, AS THE COURT
21 KNOWS, PRESERVES EVERYONE'S RIGHTS. THEY ARE INTENDED
22 JUST TO ALLOW FOR AN APPEARANCE TO BE MADE WITH PUTTING
23 EVERYTHING AT ISSUE.

24 SO REGARDLESS OF WHICH ANSWER YOU'RE GOING TO
25 FILE, YOUR CLIENTS ARE GOING TO HAVE THEIR INTEREST
26 PRESERVED. I'M HAPPY TO WORK WITH ANY OF THE COUNSEL
27 ON THESE DETAILS AND CLARIFY ISSUES.

28 OBVIOUSLY, AS THE CASE MOVES FORWARD, YOUR

1 HONOR, WE'RE GOING TO HAVE TO BE SUBSTITUTING PARTIES
2 IN; BECAUSE PROPERTIES HAVE TRANSFERRED IN THE INTERIM
3 FROM THE FILING OF THE CROSS-COMPLAINT. AND THERE'S
4 GOING TO BE A LOT OF CLEANUP. AND RATHER THAN
5 BURDENING THE COURT WITH SOME OF THIS, WE'RE HAPPY JUST
6 TO WORK IT OUT WITH COUNSEL.

7 THE COURT: I WOULD OFFER THE FOLLOWING
8 COMMENTS: AND I DON'T OWN ANY LAND IN VENTURA COUNTY,
9 BUT I'LL USE MY NAME FOR CONVENIENCE AND SETTING FORTH
10 THE HYPOTHETICAL OR TWO.

11 IF A PARTY HAS BEEN NAMED AS A
12 CROSS-DEFENDANT, I WOULD WANT THAT PARTY TO AVOID THE
13 USE OF A FORM ANSWER. THE FORM ANSWER FOR ME IS
14 INTENDED TO FLAG, WHAT I'LL CALL, A WALK-ON, SOMEBODY
15 WHO IS NOT YET NAMED IN THE CAPTION OF THE OPERATIVE
16 CROSS-COMPLAINT, BUT WHO IS GIVEN THE LEGAL RIGHT UNDER
17 THE STREAMLINE GROUNDWATER ADJUDICATION ACT TO JOIN THE
18 FIST FIGHT.

19 BUT FOR OUR CLERICAL PURPOSES, THE FACT THAT
20 THEY ARE NEW PARTIES TO THE CASE, BY THEIR WILLING
21 PARTICIPATION, IS A PROCEDURALLY IMPORTANT PART OF OUR
22 INTAKE. AND THE USE OF THE FORM ANSWER ONLY BY THAT
23 LIMITED UNIVERSE -- ACTUALLY "LIMITED" IS PROBABLY THE
24 WRONG WORD TO USE -- THAT LARGE UNIVERSE OF POTENTIAL
25 PARTIES SHOULD BE VERY MUCH LIMITED TO THAT UNIVERSE.

26 SO IF SOMEBODY WAS SERVED AS TO A SINGLE
27 PARCEL WITH BOTH A SUMMONS AND COMPLAINT, AND WITH THE
28 NOTICE OF THE PENDENCY OF THE ACTION, AND THE CAPTION

1 OF THE AMENDED COMPLAINT SHOWS THAT THEY ARE NAMED,
2 THEY SHOULD NOT USE A FORM ANSWER.

3 BUT THEY MAY USE THE ANTICIPATED ALTERNATIVE
4 COURT-APPROVED RESPONSIVE PLEADING THAT WILL HAVE
5 VERBIAGE THAT AVOIDS THE SHORT PHRASE "FORM ANSWER," SO
6 THAT IT IS IMMEDIATELY DISTINGUISHABLE EVEN BY AN
7 ENTRY-LEVEL CLERK OF THIS COURT WHEN THE PAPER IS IN.

8 NOW, WHAT'S MORE COMPLICATED IS -- LET ME BACK
9 UP AND ASK THIS, MR. HAGERTY. REMIND ME IN THE SERVICE
10 PROCESS, IF I WAS A PURE GROUNDWATER INTERESTED
11 POTENTIAL PARTY, NOT RIPARIAN, AND NOT NAMED, BUT I
12 ONLY GET THE SUMMARY NOTICE AND THE FORM ANSWER, ARE
13 YOU THROWING IN THE MAILING COPY OF THE ACTUAL
14 PLEADING, A COPY OF THE SUMMON IN SOME KIND OF
15 THOROUGHNESS?

16 MR. HAGERTY: YOUR HONOR, WE HAD SOME BACK AND
17 FORTH ON THAT, BECAUSE THE STATUTE ISN'T ENTIRELY
18 CLEAR. INITIALLY, OUR HOPE WAS JUST TO FILE THE
19 NOTICE.

20 THE COURT: NOT FILE, SERVE.

21 MR. HAGERTY: SERVE THE NOTICE. BUT ON
22 FURTHER REVIEW, I THINK WE ALL AGREE THAT THE STATUTE
23 IN THE RELEVANT PART REQUIRED US TO INCLUDE THE
24 CROSS-COMPLAINT.

25 THE COURT: JUST THE SUMMONS OR THE
26 CROSS-COMPLAINT?

27 MR. HAGERTY: CROSS-COMPLAINT.

28 THE COURT: DO YOU THINK THE SUMMONS SHOWED UP

1 IN THE ENVELOPE?

2 MR. HAGERTY: DAKOTAH BENJAMIN SHOULD BE ON
3 THE LINE. HE WOULD KNOW SPECIFICALLY IF THE SUMMONS
4 WAS INCLUDED. I DON'T THINK IT WAS, YOUR HONOR.

5 MR. BENJAMIN: GOOD AFTERNOON, YOUR HONOR.

6 THE COURT: IS THIS DAKOTAH BENJAMIN?

7 MR. BENJAMIN: DAKOTAH BENJAMIN FOR THE CITY
8 OF VENTURA. THE SUMMONS WAS NOT INCLUDED IN THE NOTICE
9 PACKET. AND THE PEOPLE THAT WERE SERVED WITH A SUMMONS
10 DID NOT RECEIVE THE FORM ANSWER. SO IT SHOULD BE
11 PRETTY CLEAR.

12 IN REGARDS TO PEOPLE THAT MAY HAVE RECEIVED
13 BOTH, THAT'S LIKELY THE RESULT OF OWNING MULTIPLE
14 PARCELS.

15 THE COURT: I WAS GOING TO MOVE ON TO THAT IN
16 A MINUTE.

17 IN MANY WAYS, IF WILLIAM HIGHBERGER
18 HYPOTHETICALLY OWNED TWO PARCELS IN THE WATERSHED, ONE
19 RIPARIAN AND ONE NOT -- OR FOR THAT MATTER BOTH
20 RIPARIAN OR NEITHER RIPARIAN. BUT WHEN HIGHBERGER IS
21 COMING TO COURT TO LITIGATE, HIGHBERGER'S INTEREST IS
22 THE PARTY, NOT THE PARCEL.

23 BUT HIGHBERGER, WHEN HE SHOWS UP IN COURT, CAN
24 LITIGATE HIS RIGHTS AS TO BOTH PARCELS I THINK WITH A
25 SINGLE ANSWER, FRANKLY. IT LEADS TO THE ADMINISTRATIVE
26 CHALLENGE, PROBABLY AS MUCH OR MORE FOR THE CITY OF
27 VENTURA AS IT IS FOR THE SUPERIOR COURT, TO SEE IF YOU
28 HAVE AN APPEARANCE FOR TWO DIFFERENT PARCELS, BOTH OF

1 WHICH ARE ASSOCIATED WITH THE NAME WILLIAM HIGHBERGER,
2 BASED, I GUESS, ON THE PLEADING THAT HIGHBERGER
3 SUBMITS.

4 ALTHOUGH, IF HIGHBERGER SUBMITS TO THE
5 JURISDICTION OF THE COURT BY ANSWERING AND ONLY LISTS
6 ONE OF THE TWO PARCELS, HIGHBERGER IS SUBMITTING TO THE
7 JURISDICTION OF THE COURT BY FILING SOME KIND OF AN
8 ANSWER.

9 AND WITH THAT, BY INFERENCE, I THINK PUTTING
10 HIS LEGAL RIGHTS AS TO BOTH PARCELS AT RISK, BECAUSE
11 YOU'RE SUBMITTING TO THE PLENARY JURISDICTION OF THE
12 COURT.

13 BUT IT'S A CLERICAL CHALLENGE. AND IF
14 HIGHBERGER WANTS TO APPEAR AS TO ONE PARCEL AND NOT THE
15 OTHER, FOR GOD KNOWS WHAT REASON, I GUESS HE BETTER
16 HAVE A LAWYER TRYING TO MAKE A SPECIAL APPEARANCE AS TO
17 ONE OF THE TWO PARCELS.

18 ALTHOUGH, HOW YOU TAKE HIGHBERGER AND HALF IN
19 FRONT OF THE COURT FOR JURISDICTIONAL PURPOSES, AND
20 HALF NOT, IS A PASSING MYSTERY TO ME. HOPEFULLY, WE
21 WON'T HAVE TO DEAL WITH THAT QUESTION.

22 MR. HAGERTY: YOUR HONOR, THERE ARE A LOT OF
23 COMPLEXITIES HERE. BUT IN ONE WAY IT CAN BE PRETTY
24 SIMPLE. BECAUSE AS THE COURT ANSWERED THE QUESTIONS,
25 IT'S EXACTLY RIGHT. IF YOU HAVE THE SUMMONS, YOU HAVE
26 TO RESPOND AND PARTICIPATE LIKE ANYONE ELSE WHO
27 RECEIVES -- IS SERVED WITH A COMPLAINT.

28 THE COURT: AND PLEASE DO NOT USE THE WORD

1 "FORM ANSWER."

2 MR. HAGERTY: CORRECT. WITH REGARD TO THE
3 NOTICE, IT IS THE ELECTION OF THE PARTY WHO RECEIVES
4 THE NOTICE WHETHER TO PARTICIPATE OR NOT. THE COURT'S
5 JURISDICTION, WHICH IS CRUCIAL TO THE CITY, IS COMPLETE
6 WHEN THE NOTICING PROCESS IS PROPERLY COMPLETED. AND
7 FOR OUR PURPOSES, THAT'S THE RELEVANT THING.

8 YES. WE WILL CLOSELY TRACK ALL OF THESE
9 ISSUES. AND WE OFFER, AGAIN, TO WORK WITH ALL COUNSEL,
10 BECAUSE IT WILL BE COMPLICATED. AND WE ADMIT THAT.
11 WE'RE HERE TO WORK WITH COURT AND COUNSEL.

12 BUT FROM THE NOTICING PERSPECTIVE, FOR THE
13 OVERLIERS, THAT IS ACTUALLY PRETTY SIMPLE IN THE SENSE
14 THAT YOU HAVE TO AFFIRMATIVELY COME IN AND PARTICIPATE,
15 IF YOU WISH TO. BUT OUR JURISDICTION FROM THE COURT
16 PERSPECTIVE, IS DONE WHEN WE COMPLETE THE NOTICING.

17 THE COURT: MR. BLATZ, HAVE I ANSWERED YOUR
18 QUESTION?

19 MR. BLATZ: YES, YOUR HONOR. AND I THINK WHAT
20 IS EVEN TUCKED IN THERE THAT MAY BE IMPORTANT FOR A
21 NUMBER OF THE CLIENTS, IS WHAT YOU SAID, WHICH IS THAT
22 THEY MAY BE ABLE TO FILE A SINGLE ANSWER FOR MULTIPLE
23 PROPERTIES. AND THE REAL QUESTION IS WHETHER THERE'S
24 MULTIPLE FILING FEES FOR THAT.

25 THE COURT: I CAN'T IMAGINE WHY IF IT'S
26 LITERALLY WILLIAM F. HIGHBERGER, A SINGLE MAN, OWNING
27 TWO OR SIX OR 28 PROPERTIES, WHEN HIGHBERGER FILES HIS
28 ANSWER AND SUBMITS TO THE JURISDICTION OF THE COURT,

1 WHETHER HE CHOOSES TO LIST ALL 28 PROPERTIES BECAUSE
2 HE'S THE SOLE OWNER OF 28 PROPERTIES, HE'S PUTTING HIS
3 LEGAL RIGHTS AS TO ALL 28 OF HIS PROPERTIES AT ISSUE
4 FOR ONLY ONE FILING FEE. THAT'S THE GOOD NEWS.

5 IF HIGHBERGER OWNS SOMETHING OUTRIGHT AS A
6 SEPARATE. AND THEN OWNS A DIFFERENT PARCEL AS
7 COMMUNITY PROPERTY WITH HIS SPOUSE. AND A THIRD
8 PROPERTY IS OWNED BY A CHAPTER S-CORPORATION THAT HE
9 OWNS, BUT THE TITLE OF THAT IS HIGHBERGER VINEYARDS
10 LLC.

11 WHEN THE SPOUSE APPEARS, THAT'S A SECOND
12 APPEARANCE FEE. AND WHEN THE LLC APPEARS, THAT'S A
13 SEPARATE APPEARANCE FEE. AND I WON'T TRY TO ANSWER THE
14 QUESTION WHAT HAPPENS IF HIGHBERGER SEPARATELY APPEARS
15 AS TRUSTEE OF A FAMILY TRUST, WHICH IS A QUITE
16 FORESEEABLE CIRCUMSTANCE IN WHICH PARCELS MAY, IN FACT,
17 BE ENTITLED TO TRUSTS, WHO TO MY UNDERSTANDING DON'T
18 APPEAR IN THEIR OWN RIGHT BUT APPEAR THROUGH THE SINGLE
19 OR CO-TRUSTEES WHO HAVE THE RIGHTS TO REPRESENT THE
20 INTEREST OF THE TRUST.

21 SO IF HIGHBERGER APPEARS BOTH IN HIS OWN RIGHT
22 AND AS A TRUSTEE, IS THAT TWO APPEARANCE FEES? I DON'T
23 KNOW THE ANSWER TO THAT QUESTION AT THE MOMENT.

24 MR. BLATZ: THANK YOU, YOUR HONOR.

25 THERE ARE A NUMBER OF PROPERTIES THAT HAVE
26 BEEN SERVED TO THE INDIVIDUALS, EVEN THOUGH THEY ARE
27 HELD IN TRUST. AND A LOT OF INCONSISTENCIES, EVEN IN
28 LIKE THE NOTICE, WHERE IT'S NOT INCLUDING THE NUMBER OF

1 NAMES OF THE PEOPLE WHO RECEIVED THE NOTICE, BUT
2 WEREN'T ACTUALLY LISTED IN THE NOTICE PAPERWORK.

3 BUT RATHER THAN TAKE EVERYONE'S TIME TO DEAL
4 WITH THIS, I'VE ALREADY STARTED THIS CONVERSATION WITH
5 MR. HAGERTY. AND HE'S BEEN VERY COOPERATIVE IN WORKING
6 WITH ME. SO I'M HAPPY TO CONTINUE TO WORK WITH HIM AS
7 NECESSARY TO GET THIS FIGURED OUT.

8 THE COURT: I AM HOPING THAT OUR
9 PUBLICLY-MAINTAINED RECORDS FOR THIS CASE WILL BE AS
10 ACCURATE AS POSSIBLE, THOUGH THE CASE PRESENTS DAUNTING
11 CHALLENGES.

12 SO I HAVE BEEN TRYING TO CLOSELY WATCH THE
13 PROGRESS OF THINGS. I HAVE ALREADY NOTICED THAT WHEN
14 FORM ANSWERS ARE RECEIVED, AND THEN THE CHARACTER OF
15 THE PARTY APPEARING IS FLAGGED USING A LIMITED UNIVERSE
16 OF POTENTIAL ALTERNATIVE LABELS, SUCH AS PLAINTIFF OR
17 DEFENDANT OR CROSS-DEFENDANT, THAT OUR STAFF IS
18 REGRETTABLY, TO MY OBSERVATION, USED THREE PARTY
19 CHARACTERIZATIONS, ONLY ONE OF WHICH IS CORRECT.

20 IT WOULD BE CORRECT, AS I'VE SEEN, TO
21 CHARACTERIZE THE NEWLY-APPEARING PARTY FILING A FORM
22 ANSWER AS A CROSS-DEFENDANT. AGREE, MR. HAGERTY?

23 MR. HAGERTY: YES.

24 THE COURT: REGRETTABLY I HAVE SEEN, HOWEVER,
25 THAT THE CLERKS HAVE ALTERNATIVELY, AS TO CERTAIN FORM
26 ANSWERS, CHARACTERIZED THEM AS SUBMISSION BY
27 "CROSS-RESPONDENT," WHICH IS, IN A HYPER-TECHNICAL
28 SENSE, NOT PRECISELY CORRECT. THIS IS NOT A PETITION.

1 IT'S A COMPLAINT.

2 AND IN OTHER CIRCUMSTANCES, CHARACTERIZE THE
3 NEWLY-APPEARING PARTY AS SIMPLY A "RESPONDENT," WHICH
4 IS EQUALLY INCORRECT.

5 ALTHOUGH IN FAIRNESS TO THE CLERK'S OFFICE,
6 SINCE THE ORIGINATING PLEADING IN THIS CONSOLIDATED
7 ACTION WAS A PETITION OF THE NONPROFIT SANTA BARBARA
8 CHANNELKEEPER.

9 AND THE DOCKET NUMBER IS THEREFORE THE ONE
10 CHARACTERIZED BY THE FILING OF PETITIONS THE ADDITIONAL
11 ACTIONS THAT GOT ADDED TO THE CASE AS CROSS-ACTIONS
12 INCLUDE MORE TRADITIONAL PLEADINGS OR THE
13 CHARACTERIZATION OR OF PARTIES ARE THOSE OF
14 CROSS-COMPLAINANTS AND CROSS-DEFENDANT.

15 CORRECT, MR. HAGERTY?

16 MR. HAGERTY: YES, YOUR HONOR.

17 THE COURT: I ALSO, FROM MY INQUIRIES, AM
18 GIVEN TO UNDERSTAND THE INTAKE OTHERWISE SEEMS TO BE
19 GOING OKAY, AS LIMITED AS IT IS SO FAR; BUT THAT
20 APPARENTLY THERE WAS SOME FURTHER EFFORT TO TIDY UP THE
21 EXCEL SPREADSHEET WITH A GAZILLION ADDITIONAL NAMED
22 CROSS-DEFENDANTS.

23 AND ONLY WHEN THE TIDYING UP IS FINALLY DONE,
24 THAT WE HOPE THAT IT WILL MAGICALLY BE ENTERED INTO OUR
25 DATABASE, WHICH WILL THEN FOR THE FIRST TIME POPULATE
26 THE NAMES OF THE CROSS-DEFENDANTS, WHO OTHERWISE ARE
27 BEING MANUALLY ENTERED AS WE GET SOME OF THE EARLY
28 RESPONSIVE PLEADINGS FROM THE NAMED CROSS-DEFENDANTS.

1 MR. HAGERTY: YES, YOUR HONOR. AND WE HAVE
2 TODAY TO PROVIDE TO THE COURT A THUMB DRIVE THAT HAS
3 THAT INFORMATION.

4 THE COURT: OKAY. COUNSEL SHOULD THEREFORE BE
5 AWARE THAT FOR NAMED CROSS-DEFENDANTS, WHO HAVE GIVEN
6 US -- FOR NAMED CROSS-DEFENDANTS WHO HAVE SHOWN UP
7 BEFORE THIS UPLOAD OCCURRED, THAT OF NECESSITY, STAFF
8 HAS ENTERED THOSE PARTY NAMES.

9 BUT AS AND WHEN THIS ELECTRONIC RECORD IS
10 UPLOADED IN THE AGGREGATE, WE WILL THEREFORE HAVE EVERY
11 REASON TO EXPECT THAT THERE WOULD BE DUPLICATE ENTRIES
12 AS TO THE PEOPLE WHO HAVE FAVORED US WITH EARLY
13 APPEARANCE AS CROSS-DEFENDANTS.

14 THIS IS LIMITED TO THE NAMES?

15 MR. HAGERTY: YES.

16 THE COURT: BECAUSE THIS EXCEL LIST WILL NOT
17 SHED ANY LIGHT ON WHO THE POTENTIAL WALK-ONS ARE, AND
18 NOR SHOULD IT. CORRECT?

19 MR. HAGERTY: YOUR HONOR, I DON'T KNOW. I'M
20 NOT -- WE DID WANT TO GIVE THE COURT THE UNIVERSE OF
21 THE NOTICED PARTIES, BECAUSE THE COURT WAS CONCERNED
22 ABOUT HOW YOU WOULD PROCESS THE FORM ANSWER WHEN IT
23 WASN'T A NAMED PARTY.

24 SO MY UNDERSTANDING IS WE PROVIDED ALL OF THE
25 INFORMATION, AND WE'VE WORKED CLOSELY WITH THE COURT
26 ADMINISTRATOR TO DO THAT. IT'S A LITTLE TECHNICAL --

27 THE COURT: SO WE MAY, SORT OF, ON THE SIDE
28 KNOW WHO TO EXPECT THE UNIVERSE OF WALK-ONS.

1 MR. HAGERTY: YES. BECAUSE OTHERWISE, THE
2 COURT WASN'T ABLE TO -- THE ADMINISTRATOR WASN'T ABLE
3 TO PROCESS IT AT ALL.

4 THE COURT: HOPEFULLY EXPEDITE IT AND AVOID
5 TYPOGRAPHICAL ERROR, AND DATA LIKE THE PARCEL NUMBER
6 THAT MAY OR MAY NOT SHOW UP ON THE HANDWRITTEN
7 PAPERWORK THAT WE ARE GIVEN.

8 MR. HAGERTY: YES, YOUR HONOR.

9 THE COURT: OKAY. MOVING AHEAD. IT WAS A
10 POINT OF CURIOSITY.

11 HAVE ANY OF THE GOVERNMENT ENTITIES OR OTHER
12 INTERESTED PARTIES HAD OCCASION TO HAVE PUBLIC MEETINGS
13 YET IN THE GENERAL VICINITY OF THE --

14 MR. HAGERTY: YOUR HONOR, THERE'S BEEN -- IF
15 THE QUESTION IS HAS THIS BEEN AN ISSUE OF PUBLIC DEBATE
16 AND DEALT WITH AT PUBLIC HEARINGS, ABSOLUTELY.

17 THE COURT: NOT SO MUCH PUBLIC HEARINGS, BUT
18 WHAT I THOUGHT WERE GOING TO BE EDUCATIONAL MEETINGS
19 FOR INTERESTED MEMBERS OF THE PUBLIC IN THE GENERAL
20 VICINITY OF THE WATERSHED.

21 MR. HAGERTY: YES. WE'VE HAD THREE PUBLIC
22 MEETINGS. ONE WAS IN THE OJAI AREA. ONE WAS IN THE
23 VENTURA AREA. AND THEN ONE WAS, SORT OF, IN BETWEEN.
24 THEY HAVE BEEN EXTRAORDINARILY WELL ATTENDED.

25 THE COURT: EVERYBODY WALKED OUT ALIVE?

26 MR. HAGERTY: I DIDN'T HAVE THE PLEASURE OF
27 BEING THERE, BECAUSE I PROBABLY WOULDN'T HAVE WALKED
28 OUT ALIVE. BUT THE CITY OF VENTURA WAS REPRESENTED.

1 ACTUALLY, FOR SOME OF THE MEETINGS, OTHER COUNSEL WERE
2 GRACIOUS ENOUGH TO CONTRIBUTE. AND WE HAVE DONE OUR
3 BEST TO GET OUT ACCURATE INFORMATION.

4 IT CERTAINLY IS AN ISSUE OF GRAVE CONCERN FOR
5 A LOT OF PEOPLE. IT'S AN ISSUE OF CONCERN FOR ALL THE
6 COMMUNITIES. BUT THOSE MEETINGS HAVE OCCURRED. IN
7 ADDITION, THERE HAVE BEEN OTHER MEETINGS OF COMMUNITY
8 GROUPS AND OTHER INTERESTED PARTIES WHERE THE CITY AND
9 OTHERS HAVE PROVIDED INFORMATION ABOUT THE
10 ADJUDICATION.

11 THE COURT: SO LET ME GO BACK THEN TO THIS
12 LODGED PROPOSED ORDER AFTER STATUS CONFERENCE. GIVEN
13 THAT THE PAPERWORK TO BE USED BY NAMED CROSS-DEFENDANTS
14 HAS TO BE EDITED, DO YOU THINK I SHOULD BE MARKING THIS
15 UP AND NOW SIGNING IT TODAY, MR. HAGERTY? OR DO YOU
16 PREFER I WAIT UNTIL YOU GIVE ME A TIDIED-UP VERSION
17 THAT HAS EVERYTHING ALL BEAUTIFUL?

18 MR. HAGERTY: WE WOULD SUBMIT A TIDIED-UP ONE
19 WITH REVISED ALTERNATIVE ANSWER FOR RIPARIANS TO USE
20 ATTACHED TO THAT. THAT WOULD BE OUR PREFERENCE. IT
21 WOULD ADDRESS THE COURT-APPROVED ANSWER ISSUE THAT WE
22 JUST TALKED ABOUT.

23 AND THEN WE WOULD HOPE IT WOULD ADDRESS ALSO
24 THE EXTENSION BY SIX MONTHS OF THE TIME TO SERVE THE
25 INITIAL DISCLOSURES FOR PARTIES WHO HAVE APPEARED.

26 THE COURT: IS THERE ANY OBJECTION TO THAT
27 REQUEST? HEARING NONE. THAT'S FINE.

28 MR. HAGERTY: THEN ALSO THE DISCLAIMER ISSUE

1 THAT THE COURT PROVIDED GUIDANCE ON.

2 THE COURT: THE \$25 FEE IN LIEU OF 465 OR 435
3 IS FINE, BUT NOT FREE.

4 MR. HAGERTY: THANK YOU, YOUR HONOR. AND NOT
5 BUNDLING. WE'LL MAKE THAT CLEAR IN THE ORDER.

6 THE COURT: BUT IF IT'S HUSBAND AND WIFE AS
7 CO-OWNERS OF THE DISCLAIMING PROPERTY, FINE.

8 MR. HAGERTY: YES, YOUR HONOR.

9 THE COURT: IF IT'S HIGHBERGER ON THE 28
10 PARCELS, I THINK FOR THAT I PROBABLY WANT 28 STIPS. BU
11 I GUESS THAT'S JUST BECAUSE I'M GREEDY. I DON'T KEEP
12 THE MONEY, BY THE WAY.

13 MR. HAGERTY: YES, YOUR HONOR.

14 AND THEN THE FINAL ISSUE, AND THIS IS ONE THAT
15 COULD BE IN THE ORDER, BUT I'M NOT SURE IT HAS TO BE
16 THERE. BUT THERE DEFINITELY IS AN ISSUE THAT WE'VE
17 ENCOUNTERED WITH FILE & SERVEXPRESS.

18 THE COURT: WHY DON'T WE JUST ADD IT TO THE
19 ORDER? THEY SAID THEY WANT SOMETHING FROM --

20 MR. HAGERTY: YES. THAT WILL BE GREAT. WE
21 WILL ADD IT TO THE ORDER.

22 THE COURT: AND THE PRO PERS WILL PAY STANDARD
23 FEES, OR ARE THEY GETTING COURTESIES?

24 MR. HAGERTY: THEY HAVE BEEN PAYING STANDARD
25 FEES, UNLESS THEY REQUEST A WAIVER.

26 THE COURT: AND IF THEY CAN GET A WAIVER THAT
27 THE COURT RECOGNIZES, THEN FILE & SERVE FOLLOWS ON AND
28 GIVE THEM THE SAME BENEFIT?

1 MR. HAGERTY: I HONESTLY DON'T KNOW THE ANSWER
2 TO THAT QUESTION. I DON'T KNOW IF DAKOTAH BENJAMIN,
3 WHO IS ON THE LINE, IF HE HAS AN ANSWER TO THAT.

4 MR. BENJAMIN: YES. GOOD AFTERNOON, YOUR
5 HONOR.

6 WITH A COURT ORDER GRANTING A FEE WAIVER, A
7 PRO PER CAN TAKE THAT TO FILE & SERVEXPRESS, AND THEY
8 WILL ALSO RECEIVE REDUCED FEES THROUGH THAT.

9 THE COURT: NOW, I CONFESS THAT -- BECAUSE I
10 THINK I WOULD -- WELL, IF YOU HAVE A FACIALLY OBVIOUS
11 FEE WAIVER, IT WILL BE PROCESSED AND GRANTED, AND I
12 WOULD NEVER SEE IT. SO MAYBE FEE WAIVERS HAVE BEEN
13 GRANTED.

14 I DON'T RECOLLECT SEEING ANY FEE WAIVERS IN
15 THE CASE, MAYBE BECAUSE THESE ARE ALL MATTERS WHERE THE
16 CROSS-DEFENDANTS ARE GOING TO HAVE SOME INTEREST,
17 MORTGAGE OR OTHERWISE, IN SOUTHERN CALIFORNIA REAL
18 ESTATE TITLE TO THEM, DIRECTLY OR THROUGH A TRUST.

19 THAT DOESN'T IMMEDIATELY CRY OUT AS POVERTY.
20 BUT IT IS CONCEIVABLE THAT SOMEBODY OF LIMITED MEANS
21 HAS INHERITED A FULLY MORTGAGED PROPERTY AND HAS QUITE
22 A STATUS IN THIS CASE, BUT IS OTHERWISE IN VERY THIN
23 FINANCIAL CONDITION. SO IT'S CERTAINLY NOT TO SAY THAT
24 A FEE WAIVER IS NECESSARILY DEAD ON ARRIVAL. THIS
25 DOCKET DOESN'T HAVE THE CHARACTERISTIC OF POVERTY THAT
26 SOME DOCKETS DO.

27 MR. HAGERTY: I THINK WE WILL INCLUDE IN THE
28 ORDER THE ISSUE OF FILE & SERVEXPRESS. WE ALSO --

1 UNLESS THE COURT OR PARTIES HAVE AN OBJECTION, THERE
2 HAVE BEEN ANSWERS THAT HAVE BEEN FILED THAT HAVE NOT
3 BEEN SERVED BECAUSE OF THIS ISSUE. WE'RE HAPPY TO PUT
4 THOSE OUT THROUGH FILE & SERVEXPRESS, JUST SO EVERYONE
5 CAN SEE THEM.

6 THE COURT: WHAT DID OUR ADVANCE NOTICE TELL
7 PEOPLE TO DO?

8 MR. HAGERTY: IT TOLD THEM TO FILE THE
9 DOCUMENT. AND IT GAVE THEM THE DIFFERENT OPTIONS FOR
10 FILING. SO PEOPLE HAVE BEEN ABLE TO ACCOMPLISH THAT.

11 THE COURT: WERE THEY TOLD TO MAIL IT TO YOUR
12 OFFICE, BECAUSE YOU'RE THE CROSS-COMPLAINANT?

13 MR. HAGERTY: YES.

14 THE COURT: DO YOU SEEM TO BE GETTING WHAT YOU
15 EXPECT, THAT MATCHES WHAT YOU TAKE TO DO THE FILINGS?

16 MR. HAGERTY: WE HAVE RECEIVED MOST OF THEM,
17 BUT NOT ALL OF THEM, YOUR HONOR.

18 BUT IMMEDIATELY THE ISSUE OF NOT BEING ABLE TO
19 USE FILE & SERVEXPRESS TO SERVE CAME UP AND WE HAVE --

20 THE COURT: GOING FORWARD, IT WILL BE A
21 NIGHTMARE.

22 MR. HAGERTY: YES, YOUR HONOR. AND THIS
23 SHOULD RESOLVE THE ISSUE.

24 THE COURT: OKAY. WE DON'T HAVE ANY NEXT
25 DATES IN THIS CASE. WHEN MIGHT I ANTICIPATE HAVING THE
26 SCIENCE DAY, WHICH COUNSEL FELT WOULD BE GOOD FOR ME?

27 MR. HAGERTY: YOUR HONOR, THERE IS PENDING A
28 JUNE 1 CMC THAT WAS SET A LONG TIME AGO.

1 THE COURT: ONE MOMENT.

2 (DISCUSSION HELD OFF THE RECORD.)

3 THE COURT: BACK ON THE RECORD.

4 I AM ADVISED THAT THE NOTICE THAT HAS BEEN
5 MAILED IN LARGE NUMBER TO THE INTERESTED GROUNDWATER
6 OWNERS GIVES THEM NOTICE OF A CASE MANAGEMENT
7 CONFERENCE ON JUNE 1 AT 1:30 P.M. CORRECT?

8 MR. HAGERTY: YES, YOUR HONOR.

9 THE COURT: WE WILL ADD THAT TO OUR OFFICIAL
10 AND UNOFFICIAL CALENDAR, IN RECOGNITION THAT MANY
11 PEOPLE HAVE ALREADY BEEN ADVISED OF THIS EVENT.

12 MR. HAGERTY: YOUR HONOR, AS TO SCIENCE DAY,
13 WE'RE HAPPY TO ADDRESS THE STATUS AS IT IS RIGHT NOW,
14 IF THE COURT WISHES.

15 THE COURT: ONE SECOND. IS THERE ANY REASON
16 TO THINK THAT THE EVENT HELD IN JUNE SHOULD BE HELD IN
17 VENTURA COUNTY? DID WE NOTICE IT FOR THIS COURTROOM?

18 MR. HAGERTY: I'M SORRY, YOUR HONOR. IT'S
19 NOTICED FOR THIS COURTROOM. YES.

20 THE COURT: THEN WE SHOULD LEAVE IT HERE. WE
21 HAVE THE TRAIN STATION SERVED BY METRO LINK. SO
22 THERE'S RELATIVELY GOOD TRANSIT ACCESS FROM VENTURA
23 COUNTY. I WOULDN'T CHANGE THE LOCUS AFTER YOU'VE SENT
24 OUT ALL THAT NOTICE. CONTINUE.

25 MR. HAGERTY: SO AS TO SCIENCE DAY, WE'VE
26 PROVIDED THE COURT WITH AN UPDATE THROUGH THE
27 STATEMENTS. BUT TO GIVE YOU A MORE RECENT UPDATE,
28 WE'VE MADE PROGRESS WITH REGARD TO THE PRESENTATION

1 RELATED TO HYDROLOGY.

2 AND AS OF THIS MORNING, WE BELIEVE THAT
3 PORTION OF IT HAS BEEN SUBSTANTIALLY AGREED TO. THE
4 PARTIES ARE ALL STRUGGLING WITH THE ECOLOGY, BIOLOGY
5 PORTION. WE'VE TRADED MULTIPLE PRESENTATIONS. WE'VE
6 HAD SEVERAL CONFERENCE CALLS. WE CONTINUE TO TRY TO
7 WORK IT OUT.

8 BUT WE REMAIN APART ON SOME KEY ISSUES. AND
9 WHETHER WE CAN GET THERE OR NOT, I THINK IS A
10 LEGITIMATE OPEN QUESTION.

11 THE COURT: SO IF YOU DON'T, WE JUST CANCEL
12 THE SCIENCE DAY?

13 MR. HAGERTY: WELL, WHAT WE WOULD SUGGEST,
14 YOUR HONOR, IS THAT IF THE PARTIES COULD WORK FOR A
15 COUPLE MORE WEEKS. WE WOULD SAY TWO TO THREE, BECAUSE
16 WE DON'T WANT TO SPEND TOO MUCH TIME IF WE CAN'T GET
17 THERE. BUT WE DO THINK IT'S WORTH TRYING TO SEE
18 WHETHER WE CAN GET THERE.

19 AND THEN WE WOULD SUGGEST THAT WE JOINTLY
20 REPORT BACK TO THE COURT ON WHAT THE STATUS IS, AND
21 PROVIDE SOME ALTERNATIVES FOR A PATH FORWARD.

22 IT COULD BE THAT WE SAY WE TRIED AND IT DIDN'T
23 WORK. BUT THERE COULD BE OTHER ALTERNATIVES THAT THE
24 PARTIES MAY WISH TO PROPOSE. WE WOULD LIKE TO LEAVE
25 THAT OPEN, TO SEE IF WHETHER WITH ADDITIONAL DIALOG, WE
26 CAN AGREE ON A PATH FORWARD.

27 THE COURT: ANYBODY DISAGREE WITH MR. HAGERTY?
28 OKAY. LET ME FILL YOU IN ON MY CALENDAR AND

1 OTHER COMMITMENTS. I AM HERE THROUGH FRIDAY, MARCH
2 20TH, INSOFAR AS YOU HAVE PROBLEMS AND WANT TO USE THE
3 MESSAGE BOARD OR OTHERWISE TO INTERACT WITH THE COURT.

4 UNLESS THE COVID-19 GETS IN THE WAY, MY WIFE
5 AND I HOPE TO BE FLYING VIA LONDON TO ROME TO SICILY,
6 FROM MARCH 21 TO APRIL 8TH. A SHORT SOJOURN IN ROME ON
7 THE WAY BACK.

8 SO AT THE MOMENT THAT APPEARS TO STILL BE
9 AVAILABLE TO THE GENERAL PUBLIC WITH MODES OF
10 TRANSPORTATION OPERATIVE. IF PLANS CHANGE, THAT
11 DOESN'T NECESSARILY MEAN I'M GOING TO COME TO WORK.
12 I'LL HAVE TO FIND A DIFFERENT DESTINATION.

13 I'M DUE BACK ON APRIL 9. I HAD AGREED, AT
14 JUDGE FREEMAN'S REQUEST, TO TAKE AN ASBESTOS TRIAL.
15 THAT'S A 15-COURT DAY TRIAL THAT IS NOW SCHEDULED TO
16 START APRIL 14. AND BECAUSE I'M DARK ON APRIL 20TH AND
17 MAY 1, THAT SHOULD RUN THROUGH APPROXIMATELY MAY 8TH.

18 THAT IS TO SAY THAT IF I'M ACTUALLY ENGAGED IN
19 THAT ASBESTOS TRIAL AND THE FOUR DEFENDANTS DON'T ALL
20 SETTLE, THOSE WOULD BE POOR CHOICES FOR SCIENCE DAY.
21 BUT THEN AGAIN, WHEN THE PARTIES KNOW THEY HAVE AN OPEN
22 COURT ON A DATE CERTAIN FOR TRIAL, A CERTAIN PERCENTAGE
23 IN LITIGATION MAGICALLY SETTLES, BUT NOT ALL.

24 AND YOU CAN CALL THE COURTROOM STAFF AND SEE
25 IF THINGS EVOLVED ON THAT CASE. IT'S CALLED CARMICHAEL
26 VERSUS MICHELIN OF NORTH AMERICA.

27 I AM UNAVAILABLE MAY 12 TO 14 FOR A CONFERENCE
28 IN SAN DIEGO. I'M UNAVAILABLE MAY 18 TO 20 FOR A

1 CONFERENCE IN SAN FRANCISCO. I'M UNAVAILABLE MAY 15
2 FOR A FACILITIES-RELATED MEETING IN SACRAMENTO. I'M
3 UNAVAILABLE MAY 22 THROUGH 26. I'M GOING TO
4 YELLOWSTONE TO CELEBRATE MY 70TH BIRTHDAY.

5 I'M UNAVAILABLE THE AFTERNOON OF MAY 28 AND
6 ALL DAY MAY 29 FOR MY LAW SCHOOL REUNION BACK EAST. I
7 AM AVAILABLE JUNE 1, WHICH IS FORTUNATE.

8 MR. HAGERTY: YOUR HONOR, I THINK WITH THOSE
9 DATES, THE LOGICAL THING FROM OUR PERSPECTIVE, WOULD BE
10 TO JUST GIVE YOU A REPORT BEFORE YOUR MARCH 20TH
11 DEPARTURE.

12 THE COURT: IN MANY WAYS, THE REALISTIC THING
13 IS IF YOU HOPE TO DO THE SCIENCE DAY BEFORE THE COURT
14 IS KNEE HIGH, IS TO TRY TO GET IT DONE BY MARCH 20TH.
15 STOP YOUR HAGGLING AND GET SOMETHING TOGETHER AND
16 ACTUALLY DO SOMETHING THE WEEK OF MARCH 16 OR THE WEEK
17 OF MARCH 9TH.

18 I'LL MOVE THINGS AROUND TO FIT YOU IN. BUT IF
19 YOU WANT TO KEEP HAGGLING ABOUT WHATEVER POWER POINT
20 SLIDE IS HOLDING YOU APART -- IT'S YOUR IDEA, NOT MINE.
21 IF THAT WAS A GOOD IDEA ORIGINALLY, IT STILL SHOULD BE
22 A GOOD IDEA.

23 YOU'RE HAGGLING SO MUCH, YOUR AVAILABLE OPTION
24 IS SLOWLY RECEDING OVER THE HORIZON. THE PEOPLE WHO
25 THOUGHT IT WAS A GOOD IDEA, YOU SHOULD PUT YOUR HAGGLES
26 ASIDE AND COME UP WITH SOMETHING. SHOULD I TAKE A
27 BREAK AND LET YOU GUYS GO OUT AND SEE IF -- ARE YOU
28 HAGGLING MOSTLY WITH THE AG'S REPS, OR SOMEONE ELSE?

1 MR. HAGERTY: YOUR HONOR, I THINK THE PARTIES
2 ARE JUST DECIDING WHETHER WE CAN GET TO A POINT WHERE
3 IT WOULD BE A VALUE TO THE COURT. PEOPLE JUST HAVE
4 DIFFERENT PERSPECTIVES ON A COUPLE OF ISSUES THAT WE'VE
5 YET BEEN ABLE TO BRIDGE.

6 IT WOULD NOT HELP TO GIVE US A BREAK AND TALK.
7 WE ARE TALKING. WE CONTINUE TO TALK. WE JUST MAY NOT
8 GET THERE. I THINK WE WOULD BE ABLE TO TELL YOU VERY
9 SOON WHETHER WE CAN GET THERE OR NOT.

10 MAYBE MR. COSGROVE HAS SOME THOUGHTS.

11 MR. COSGROVE: THANK YOU. DAVID COSGROVE FOR
12 CASITAS.

13 FROM OUR STANDPOINT, SOONER ON SCIENCE DAY IS
14 PROBABLY BETTER. I THINK WE ARE DOWN TO HAVING PRETTY
15 WELL-DEFINED WHAT THE DIFFERENCES IN THE PRESENTATIONS
16 ARE. THE GROUP OF --

17 THE COURT: YOU GOT THE JUNIOR WATER USERS,
18 JUNIOR IN TIME?

19 MR. COSGROVE: WELL, CERTAINLY I'M NOT GOING
20 TO SAY THAT ON THE RECORD. I HAVE CASITAS MUNICIPAL
21 WATER DISTRICT.

22 THE COURT: THE AGE OF THE DAM THAT SUPPORTS
23 CASITAS' RESERVOIR IS NEWER THAN THE AGE OF THE
24 SUBTERRANEAN DAM THAT VENTURA PUT IN PLACE IN 1905?

25 MR. COSGROVE: I BELIEVE THAT THAT IS THE
26 CASE.

27 THE COURT: OKAY. YOU DIDN'T CONCEDE
28 ANYTHING.

1 MR. COSGROVE: THE POINT BEING, YOUR HONOR,
2 THAT THE GROUP OF CONSUMPTIVE USERS HAS BEEN WORKING.
3 AND I THINK WE'VE PRETTY MUCH GALVANIZED POSITIONS ON
4 BOTH THE HYDROLOGY AND THE BIOLOGY PRESENTATION THAT WE
5 THINK ARE APPROPRIATE. WHERE THE NEGOTIATION IS, IS
6 WITH THE COUNTERPARTS AT THE STATE, BOTH THE STATE
7 BOARD AND THE DEPARTMENT OF FISH AND WILD LIFE.

8 SO A LOT OF EFFORT HAS GONE INTO THIS. I
9 THINK WE PRETTY MUCH KNOW WHERE THE DIFFERENCES LIE.
10 IT'S JUST A QUESTION OF WHETHER THERE'S A COMPROMISE
11 OUT THERE THAT WILL GET THE BENEFITS THAT WE ORIGINALLY
12 IDENTIFIED, OR WHETHER THE PARTIES FEEL THAT THAT
13 COMPROMISE IS NOT WORTH THOSE BENEFITS.

14 AND SOONER ON THAT IS BETTER THAN LATER,
15 BECAUSE A LOT OF EFFORT AND NO SMALL AMOUNT OF EXPENSE
16 IS GOING INTO TRYING TO GENERATE THAT. AND I KNOW, AT
17 LEAST FROM MY CLIENT'S PERSPECTIVE, THEY WOULD LIKE
18 A-GO OR NO-GO ON SCIENCE DAY PRETTY QUICK. BECAUSE IF
19 IT'S NO-GO, WE WOULD LIKE TO BE MOVE ON TO OTHER
20 PRODUCTIVE PURSUITS.

21 THE COURT: I WOULD URGE YOU TO LET ME REBOOK
22 YOU FOR SOMETIME THE WEEK OF MARCH 9 OR WEEK OF MARCH
23 16. BUT I'M WILLING TO OFFER YOU -- BECAUSE THIS, FROM
24 A BOOKING POINT OF VIEW, IS GETTING CLOSE TO THE LAST
25 PRACTICAL OPPORTUNITY, UNLESS YOU WOULD LIKE TO GET
26 BACK TO THE COURT WITHIN SEVEN TO 10 DAYS AT THE VERY
27 LATEST.

28 MR. HAGERTY: I THINK MY PREFERENCE WOULD BE

1 TO LET US TALK AND GET BACK TO YOU AT LEAST ON A DATE.
2 IF THE COURT HAS THAT AVAILABILITY, WE CAN WORK WITH
3 THE CLERK.

4 THE COURT: IT'S NOT EVERY MORNING AND
5 AFTERNOON THAT PERIOD. BUT AT THE MOMENT, I CAN PUSH
6 THINGS AROUND AND MAKE AVAILABILITY ESSENTIALLY FOR A
7 HALF-DAY EVENT, WHICH IS ALL I THINK YOU WANT.

8 MR. HAGERTY: CORRECT. IT'S A HALF DAY. YES.

9 GIVEN THAT THERE'S MULTIPLE PARTIES WHO WE
10 NEED TO TALK TO AND WORK OUT, I'D PREFER THAT WE
11 SUGGEST A DATE TO YOU OR REPORT BACK THAT WE'RE NOT
12 GOING TO GET THERE.

13 THE COURT: SO I DO WANT TO GIVE YOU ANOTHER
14 STATUS CONFERENCE SOONER THAN JUNE 1. RELATIVE TO MY
15 COMINGS AND GOINGS, AND WHAT YOU PERCEIVE TO BE GOING
16 ON IN THE CASE, WHAT WOULD BE YOUR TARGET DATE FOR WHEN
17 YOU THINK WE OUGHT TO HAVE THE NEXT STATUS CONFERENCE,
18 MR. HAGERTY?

19 MR. HAGERTY: LET'S SEE. OUR PROOFS WILL BE
20 FILED MAY 1. MAYBE IN MAY, YOUR HONOR. I'M TRYING TO
21 THINK OF YOUR AVAILABILITY THOUGH.

22 THE COURT: WHAT ABOUT FRIDAY, MAY 8TH?

23 MR. HAGERTY: THAT WOULD BE FINE WITH THE
24 CITY, YOUR HONOR.

25 THE COURT: I THINK THAT'S HOPEFULLY AFTER THE
26 ASBESTOS TRIAL, OR AT LEAST WHEN THE JURY DELIBERATING,
27 WHICH IS ALMOST AS GOOD.

28 ANY OBJECTION TO A STATUS CONFERENCE ON

1 FRIDAY, MAY 8TH AT 1:30 P.M. HEARING NONE, THAT WILL
2 BE THE ORDER OF THE COURT, WITH AN UPDATED REPORT FROM
3 CITY OF VENTURA DUE MAY 1. OTHER PARTIES ARE ALLOWED
4 TO JOIN IN. OTHER PARTIES ARE ALLOWED TO FILE THEIR
5 OWN RESPONSE OR UNILATERAL REPORTS BY MAY 1.

6 BUT I'LL LET YOU TAKE THE LEAD AND TRY TO GET
7 A CONSENSUS DOCUMENT, MR. HAGERTY.

8 MR. HAGERTY: THANK YOU, YOUR HONOR.

9 THE COURT: NEW QUESTION: DO I REMEMBER THAT
10 SOME NEUTRAL HAD HAD A CHANCE TO TAKE A SWING AT
11 HELPING YOU SETTLE THE CASE?

12 MR. HAGERTY: YES, YOUR HONOR. JUDGE KOMAR
13 HELPED US WITH THE FIRST MEDIATION.

14 THE COURT: HAS HE DONE ANYTHING WITH YOU FOR
15 THE LAST THREE MONTHS?

16 MR. HAGERTY: NO, YOUR HONOR.

17 THE COURT: A DIFFERENT QUESTION: HOW ARE
18 SETTLEMENTS TALKS GOING, NOTWITHSTANDING THE AVOIDANCE
19 OF SPENDING MONEY ON JACK KOMAR? I DON'T MEAN THAT
20 NEGATIVELY. IN SO FAR AS YOU DOING OLD-SCHOOL LAWYER
21 NEGOTIATING, ARE YOU MAKING ANY PROGRESS?

22 MR. HAGERTY: YES, YOUR HONOR. WITH A CAVEAT
23 THAT -- I'LL JUST PREEMPT THE STATE FROM GETTING UP AND
24 SAYING THEY HAVEN'T HEARD ANYTHING FROM US.

25 THE CONSUMPTIVE USERS, WHICH AT LEAST IN OUR
26 VIEW, IS THE APPROPRIATE PARTY TO BE TALKING RIGHT NOW.
27 BECAUSE AS THE COURT RECALLS, WE HAVE AN INTERIM
28 SETTLEMENT WITH CHANNELKEEPER.

1 THAT DOESN'T SETTLE ALL ISSUES, BUT IT SETTLES
2 THE PAST ISSUES WITH CHANNELKEEPER. AND WE'LL CONTINUE
3 TO TALK WITH CHANNELKEEPER ABOUT WHAT HAPPENS OVER THE
4 SUMMER, WHICH IS A CONCERN TO CHANNELKEEPER. WE'VE
5 RECOGNIZED THAT.

6 AND WE HAVEN'T ENGAGED IN ANY DETAILED
7 DISCUSSIONS WITH THE STATE AT THIS POINT IN TIME. AND
8 WE KNOW THAT THEY WOULD LIKE TO HAVE THOSE DISCUSSIONS.
9 AND WE WILL HAVE THOSE DISCUSSIONS.

10 BUT RIGHT NOW, THE CONSUMPTIVE USERS GROUP IS
11 WORKING VERY HARD -- AND WE'VE REPORTED WHAT OUR
12 ACTIVITIES ARE -- TO COME TO AN AGREEMENT ON OUR SIDE,
13 WHICH IS REALLY THE LYON SHARE OF THE WORK HERE. I
14 MEAN, THE STATE OBVIOUSLY HAS CRITICAL INTERESTS.
15 CHANNELKEEPER HAS CRITICAL INTERESTS. WE DON'T
16 DOWNPLAY THAT AT ALL.

17 BUT IN TERMS OF WHO WILL BE IMPLEMENTING THE
18 SETTLEMENT, WHO REALLY IS AT ISSUE IN TERMS OF THE
19 WATER USE, WE ARE WORKING VERY HARD TO COME UP WITH AN
20 APPROACH. WHEN WE'RE COMPLETED, WHICH WE HOPE WILL BE
21 -- I'LL USE THE TERM SOON. THAT'S A RELATIVE TERM IN
22 THIS WORLD. WE WILL DISCUSS IT WITH THE STATE. WE
23 WILL DISCUSS IT WITH THE CHANNELKEEPERS.

24 AND THEN ULTIMATELY, YOUR HONOR, AS WE'VE
25 TALKED BEFORE, IT'S THE COURT'S CONSTITUTIONAL DUTY.
26 AND WE WILL TALK TO YOU ABOUT THAT, AND PROVIDE YOU
27 BRIEFING ABOUT IMPLEMENTING A PHYSICAL SOLUTION.

28 SO, YES, WE'RE MAKING WHAT I WOULD CHARACTER

1 AS VERY, VERY GOOD PROGRESS. IT'S NOT AS CLEAR TO THE
2 STATE. AND THERE'S JUST THINGS WE NEED TO WORK OUT ON
3 OUR SIDE BEFORE WE'RE READY TO DO THAT.

4 I WILL SAY THOUGH, AND I'VE TALKED TO THE
5 STATE ABOUT THIS, IS THAT WHAT WE'RE WORKING ON REALLY
6 ISN'T A MYSTERY. THE DETAILS ARE, BUT THE FRAMEWORK IS
7 CLEAR. WE'VE TALKED WITH BOTH CHANNELKEEPER AND THE
8 STATE ABOUT THE FRAMEWORK THAT WE'RE WORKING ON. I
9 ADMIT THAT THEY HAVEN'T SEEN THE DETAILS. AND WE CAN'T
10 SHARE THOSE AT THE MOMENT. BUT WE ARE WORKING VERY
11 HARD TO MAKE THAT HAPPEN.

12 THE COURT: MR. COSGROVE, ANYTHING TO ADD?

13 MR. COSGROVE: ONLY TO SAY THAT THERE'S A LOT
14 OF CAT HERDING INVOLVED IN TRYING TO HAMMER OUT
15 WORKABLE PHYSICAL SOLUTION THAT WILL SERVE THE FISHERY
16 AND OBSERVE THE VARIOUS BENEFICIAL USES, THE POLITICAL
17 AND FINANCIAL DEMANDS THAT THAT VERY DIVERSE GROUP OF
18 CONSUMPTIVE USERS HAVE.

19 SO WE ARE WORKING VERY HARD TO TRY TO MESH
20 THOSE INTO SOMETHING THAT EVERYBODY CAN GET BEHIND
21 BEFORE WE ENGAGE WITH THE STATE ON THE SPECIFICS, IN
22 ORDER TO MAKE THAT NEGOTIATION A LITTLE MORE EFFICIENT.

23 THE COURT: OKAY. WHAT ELSE, IF ANYTHING?

24 MR. MELNICK: YOUR HONOR, CAN I JUST SAY A FEW
25 WORDS ABOUT THE SETTLEMENT?

26 THE COURT: GO AHEAD. THIS IS MR. KRASNER?

27 MR. MELNICK: NO. I'M MARC MELNICK.

28 THE COURT: OKAY. MR. MELNICK. STATE WATER

1 RESOURCES CONTROL BOARD?

2 MR. MELNICK: RIGHT. WE APPRECIATE THE EFFORT
3 THAT THE CONSUMPTIVE USERS HAVE BEEN MAKING TOWARDS
4 THEIR PROPOSED SETTLEMENT. WE ARE QUITE CONCERNED
5 ABOUT THEM GOING AND TALKING IN THE CORNER AMONGST
6 THEMSELVES AND NOT TALKING TO ANYBODY ELSE; BECAUSE YOU
7 KNOW HOW ECHO CHAMBERS HAPPEN. AND --

8 THE COURT: THEY ARE FIGHTING AMONGST
9 THEMSELVES TO FIGURE HOW TO ALLOCATE 90 PERCENT OF THE
10 AVERAGE FLOW; THEN FIGURE OUT WHETHER OR NOT THE STATE
11 AND THE ORIGINAL PLAINTIFF WOULD BE SATISFIED WITH THAT
12 REDUCED DEMAND ON THE WATERSHED.

13 GIVEN THAT AS AMONGST THEMSELVES WITH THE
14 DIFFERENT AGE OF THEIR RIGHTS AND PUBLIC INTEREST IN
15 EACH OF THE USERS CONTINUING ABILITY TO TAKE SOME
16 MEANINGFUL AMOUNT OF WATER, THAT THEY HAVE TO JOSTLE
17 EACH OTHER TO ASSUME A POSITION THAT IS PLAUSIBLE AND
18 REASONABLE.

19 MR. MELNICK: I HOPE THAT'S THE CASE, YOUR
20 HONOR. I THINK THERE'S OTHER THINGS THAT MIGHT
21 POSSIBLY BE GOING ON. WE'VE JUST BEEN --

22 THE COURT: I DIDN'T SEE ANY SALINIZATION
23 PLANTS OR SEWER PLANTS. I DISCOVERED APPARENTLY THE
24 EXISTING SEWER PLANT IS LOCATED IN A PLACE WHERE
25 PUMPING WATER UPSTREAM OF A REFILL RIVER IS
26 IMPRACTICAL, IF NOT IMPOSSIBLE.

27 MR. MELNICK: I THINK THE QUESTION FROM OUR
28 STANDPOINT, IS WHETHER THEY ARE JUST MOVING WATER

1 AROUND OR THEY ARE TRYING TO SOLVE THE CORE PROBLEM.

2 THE COURT: WHICH IS, MORE WATER NEEDS TO BE
3 LEFT IN THE NATURAL STREAMS.

4 MR. MELNICK: RIGHT.

5 THE COURT: AT LEAST IN THE LOW WATER SEASONS
6 OF THE YEAR.

7 MR. MELNICK: AT LEAST.

8 SO WE'VE BEEN ASKING THEM TO TALK TO US. I
9 WON'T SAY WE'VE BEGGED, BUT WE'VE BEEN ASKING. WE JUST
10 WANT TO START HAVING CONVERSATIONS. WE DON'T WANT THEM
11 TO SPEND ALL THIS TIME NEGOTIATING AMONGST THEMSELVES
12 ON SOME FOOL'S ERRAND.

13 AND, YOUR HONOR, I THINK IN ADDITION TO MY
14 CLIENT AND MR. GOLDEN KRASNER'S CLIENT AND MR. COOPER'S
15 CLIENT, THERE'S A LARGE POPULATION OF VERY ANGRY PEOPLE
16 IN THIS COUNTY ABOUT THIS LAWSUIT.

17 AND THEY ARE GOING TO HAVE TO CONVINCING THEM AS
18 WELL THAT THIS IS A GOOD SOLUTION THAT THEY ARE COMING
19 UP WITH.

20 THE COURT: WELL, THE POLITICAL ENTITIES,
21 INCLUDING MUTUAL WATER DISTRICT PUBLICLY OWNED HAVE TO
22 RESPOND TO IRATE VOTERS.

23 MR. MELNICK: YES.

24 THE COURT: SO OBVIOUSLY WHAT THE CITY OF OJAI
25 CITY OR THE CITY OF VENTURA CAN AGREE TO, DEPENDS A
26 LITTLE BIT ON WHAT THE LIKELY POLITICAL IMPACT IS. THE
27 CASITAS WATER DISTRICT HAS PEOPLE ACCOUNTABLE DIRECTLY
28 AND INDIRECTLY WITH VOTERS.

1 SO DO I INFER THAT THE ISSUANCE OF NOTICE OF
2 THE PENDENCY OF THE LAWSUIT IS INTENDED TO MAKE THE
3 LANDOWNERS IRATE AT PEOPLE WORRIED ABOUT THE HEALTH OF
4 THE FISH.

5 MR. MELNICK: I'M THE ONLY ONE IN THIS ROOM
6 WHO WENT TO THOSE THREE COMMUNITY MEETINGS. AND THERE
7 WERE A LOT OF ANGRY PEOPLE THERE.

8 THE COURT: WHO WERE THEY ANGRY AT? TELL ME
9 WHO YOU PERCEIVE.

10 MR. MELNICK: MOSTLY AT THE CITY OF VENTURA
11 FOR SUING THEM.

12 THE COURT: SO THEY WEREN'T NECESSARILY MAD AT
13 THE FISH, BUT THEY WERE MADE AT THE CITY OF VENTURA.

14 MR. MELNICK: RIGHT. IT'S A WHOLE RANGE OF
15 PEOPLE.

16 THE COURT: NOBODY LIKES TO GET SUED.

17 MR. MELNICK: RIGHT. SO JUST MY POINT, YOUR
18 HONOR, IS JUST THAT WE NEED TO HAVE THESE
19 CONVERSATIONS. WE WANT TO HAVE THOSE CONVERSATIONS.
20 AND I WORRY THAT THIS SETTLEMENT IS JUST BEING CREATED
21 IN AN ECHO CHAMBER.

22 THE COURT: I'M DELIGHTED TO HAVE YOU TALK TO
23 MR. HAGERTY IN MY PRESENCE. IS THERE SOMETHING THAT
24 YOU AND MR. MELNICK THINK THAT I HAVE THE POWER TO DO
25 THAT YOU WANT ME TO DO?

26 MR. MELNICK: NO. I JUST WANT YOU TO BE AWARE
27 THIS IS THE DYNAMIC THAT'S GOING ON.

28 THE COURT: OKAY. ANYBODY ELSE WISH TO BE

1 HEARD ON THE PHONE?

2 MR. COOPER: YES, YOUR HONOR. THIS IS
3 MR. COOPER FOR CHANNELKEEPER.

4 THE COURT: CONTINUE.

5 MR. COOPER: AND I WOULD AGREE WITH
6 MR. MELNICK IN TERMS OF THAT WE'VE BEEN WAITING QUITE A
7 WHILE -- BEEN PROMISED FOR QUITE A WHILE, THEN WAITING
8 QUITE A WHILE FOR THE SETTLEMENT PROPOSAL.

9 AND I WOULD DISAGREE WITH MR. HAGERTY THAT WE
10 UNDERSTAND THE FRAMEWORK. WE DON'T UNDERSTAND THE
11 FRAMEWORK. WE'VE HEARD SOME BASIC CONCEPTS DURING THE
12 SETTLEMENT PROCESS. BUT WE REALLY DON'T KNOW WHAT THIS
13 IS GOING TO LOOK LIKE OR HOW IT'S EVEN -- EVEN THE DATA
14 IT RELIES ON OR DECIDES WHAT FLOWS WOULD BE APPROPRIATE
15 IN THE RIVER FOR THE FISH AND OTHER BENEFICIAL USES.

16 AND AS MR. HAGERTY NOTED, WE'RE GOING TO COME
17 UP ON THE DRY SEASON HERE, LATE SUMMER, EARLY FALL,
18 WHICH IS TYPICALLY WHEN -- FROM OUR PERSPECTIVE ANYWAY
19 -- THE CITY DRIES OUT THE RIVER IN REACH 4, KILLING THE
20 FISH.

21 SO WE BETTER START TALKING SOON, IN OUR VIEW,
22 YOUR HONOR, IF WE'RE GOING TO GET SOMETHING WORKED OUT,
23 OR ELSE WE'RE GOING TO BE IN MOTION PRACTICE IN ADVANCE
24 OF THE FALL, TO MAKE SURE THAT THIS COURT AT LEAST
25 CONSIDERS ORDERING SUFFICIENT WATER FOR FISH THIS DRY
26 SEASON.

27 I THINK WE ALL -- THIS HAS BEEN A LONG TIME
28 COMING. WE NEED TO GET A MOVE ON. I REALLY ECHO

1 MR. MELNICK'S CONCERN THAT THE CONSUMPTIVE USERS ARE
2 ALL NEGOTIATING; AND THEN THEY ARE GOING TO COME TO US
3 AND IT'S GOING TO BE A NONSTARTER.

4 SO THE SOONER WE CAN GET TALKING, IN MY VIEW,
5 THE BETTER, IF WE EXPECT TO MAKE PROGRESS TOWARDS
6 RESOLVING THIS WITHOUT LITIGATION.

7 THE COURT: AGAIN, THE SAME QUESTION I PUT TO
8 MR. MELNICK, IS THERE SOME ORDER YOU THINK I CAN OR
9 SHOULD MAKE, MR. COOPER, AT THIS TIME?

10 MR. COOPER: WELL, I THINK THE COURT SHOULD
11 JUST BE AWARE THAT AT THAT STATUS CONFERENCE IN MAY, IF
12 WE HAVEN'T WORKED SOMETHING OUT, CHANNELKEEPER WILL BE
13 SEEKING A BRIEFING SCHEDULE ON WHETHER OR NOT THE
14 REGIME, EITHER EXISTING REGIME AT CURRENT PUMPING
15 LEVELS THAT THE CITY HAS BEEN DOING, ARE REASONABLE OR
16 WASTEFUL OF WATER FOR THE 2020 -- FALL OF 2020.

17 SO THAT WOULD BE -- I JUST WANT TO PUT YOU ON
18 NOTICE, YOUR HONOR, THAT THAT'S COMING, AND ALSO THE
19 OTHER PARTIES. SO THAT IF WE CAN'T GET SOMETHING
20 MOVING HERE PRETTY SOON, THAT'S WHERE THIS IS HEADING,
21 FROM OUR PERSPECTIVE.

22 THE COURT: OKAY. A RELATED QUESTION: HOW
23 MANY MONTHS STORAGE DOES THE CITY OF VENTURA HAVE AFTER
24 THE WATER IS LIFTED FROM THE MAIN LOCATION IN THE
25 RIVER?

26 DOES IT HAVE ANY MEANINGFUL STORAGE OR ANY
27 ALTERNATIVE BELOW GROUND RESERVOIR OR ABOVE GROUND
28 STORAGE, BY WAY OF RESERVOIR OR OTHERWISE?

1 MR. HAGERTY: FROM ITS WITHDRAWALS FROM THE
2 RIVER, IT'S A VERY MINIMAL STORAGE. LAKE CASITAS,
3 WHICH IS THE LARGEST STORAGE AREA IN THIS PART OF THE
4 COUNTY, ESSENTIALLY IS THE STORAGE AREA.

5 THE COURT: DOES VENTURA CITY GET TO SHARE THE
6 BENEFIT OF USING LAKE CASITAS?

7 MR. HAGERTY: YES, YOUR HONOR. WE PURCHASE
8 WATER AND HAVE A LONG-STANDING RELATIONSHIP WITH LAKE
9 CASITAS AND CASITAS WATER DISTRICT.

10 THE COURT: DO YOU PUT IT IN THERE FOR STORAGE
11 AND THEN TAKE IT OUT LATER, OR YOU BUY SOME OF THEIR
12 RIGHTS?

13 MR. HAGERTY: CASITAS DIVERTS AND ALSO OBTAINS
14 WATER FROM THE WATERSHED THAT FEEDS INTO LAKE CASITAS.
15 AND THEN WE HAVE AN AGREEMENT THAT ALLOWS US TO
16 PURCHASE WATER. THERE ARE OTHER ARRANGEMENTS TOO THAT
17 ARE FAIRLY COMPLICATED, YOUR HONOR.

18 TO ANSWER YOUR SPECIFIC QUESTION, AS IT
19 RELATES TO THE RIVER, THE CITY HAS VERY LIMITED
20 STORAGE. NONE OF THIS IS NEW, YOUR HONOR. I'VE TALKED
21 TO MR. COOPER. I'VE TALKED TO MR. MELNICK. WE WILL
22 CONTINUE TO DO THAT.

23 THIS IS VERY HARD. AND I COMPLETELY
24 UNDERSTAND THEIR POSITIONS. I'VE ALREADY TALKED TO
25 MR. COOPER ABOUT WHAT'S HAPPENING IN THE SUMMER. WE
26 KNOW HIS POSITION. WE'VE INDICATED WHAT WE ARE WILLING
27 TO DO AND TO TALK ABOUT.

28 I'M NOT SURE THIS IS BENEFICIAL, JUST TO PUT

1 THAT ON THE TABLE, YOUR HONOR --

2 THE COURT: PICKING AT SCABS HERE.

3 MR. HAGERTY: YEAH. I THINK SO. IT MAY
4 DEVOLVE INTO A FIGHT. THAT MAY HAPPEN. WE DON'T WANT
5 THAT TO HAPPEN. OUR GOAL IS TO MAKE IT NOT HAPPEN. WE
6 BELIEVE WE'VE SHOWN VERY GOOD FAITH WITH WORKING WITH
7 CHANNELKEEPER BY ENTERING INTO THE INTERIM SETTLEMENT.

8 THERE IS A FLOW REGIME THAT WE'VE AGREED TO IN
9 THAT SETTLEMENT. IT DOES END SOON. BUT WE'VE ALREADY
10 TALKED TO CHANNELKEEPER ABOUT OPENING UP DISCUSSIONS
11 RELATED TO EXTENDING THAT WITHOUT MAKING A COMMITMENT,
12 BECAUSE THAT'S AN IMPORTANT ISSUE FOR THE CITY. BUT
13 WE'RE OPEN TO THAT.

14 WE'VE ALSO TALKED A LOT WITH MR. MELNICK ABOUT
15 TIMING. AND WE UNDERSTAND HIS CONCEPT OF AN ECHO
16 CHAMBER. BUT THERE'S A LOT OF WORK ON OUR SIDE STILL
17 TO DO. WE WOULD JUST ASK THE PARTIES TO UNDERSTAND
18 THAT. THEY ARE GOING TO MAKE THEIR DECISIONS. THEY
19 ARE GOING TO TAKE THEIR ACTIONS. BUT I'M NOT SO SURE
20 THIS IS THE BEST FORM TO HAVE THESE CONVERSATIONS, YOUR
21 HONOR.

22 THE COURT: IS MY MEMORY CORRECT THAT, AT
23 LEAST THIS PORTION OF VENTURA COUNTY LACKS ANY
24 CONNECTION TO THE STATE WATER PROJECT?

25 MR. HAGERTY: CORRECT. ALTHOUGH THE CITY HAS
26 A PROJECT WHERE IT'S SEEKING TO CONNECT. IT HAS
27 ALLOCATION, AS DOES CASITAS. WE HAVE APPROVED THE
28 PROJECT, BUT WE ARE BEING --

1 THE COURT: SO IT HAS AN UNUSED ALLOCATION
2 FROM THE STATE WATER PROJECT?

3 MR. HAGERTY: IT HAS AN ALLOCATION THAT --
4 UNUSED IS PROBABLY A LITTLE -- IT'S BEING USED BY
5 OTHERS.

6 THE COURT: SOLD TO METROPOLITAN WATER
7 DISTRICT, SOLD TO THE CITY OF LOS ANGELES?

8 MR. HAGERTY: WE HAVE AN EXISTING ALLOCATION
9 THAT WE CAN ACCESS IF WE CAN MAKE THE CONNECTION. WE
10 HAVE APPROVED A PROJECT TO TIE INTO AND BUILD THAT OUT.

11 WE ARE CURRENTLY BEING SUED UNDER CEQA FOR
12 THAT PROJECT. BECAUSE THERE ARE SOME GROUPS WHO DON'T
13 LIKE THE IDEA OF TYING INTO THE STATE WATER PROJECT.
14 SO THAT'S WHY THESE THINGS ARE VERY COMPLICATED. IT
15 WILL TAKE US A LOT OF TIME TO WORK THESE ISSUES OUT.

16 AND WE WILL JUST CONVEY TO THE COURT AND
17 CONVEY TO THE PARTIES, WE ARE WORKING AS HARD AS WE
18 CAN. IT'S IN OUR INTEREST TO ACHIEVE PHYSICAL SOLUTION
19 TO THIS ISSUE AND ALSO TO SOME OTHER ISSUES THAT ARE
20 PENDING.

21 THIS IS SOMETHING THAT WE ARE WORKING HARD AT.
22 IT IS ABSOLUTELY -- MR. MELNICK IS RIGHT, AS I
23 COMMUNICATED EARLIER, THE COMMUNITIES ARE VERY UPSET
24 FOR THE FACT THAT THE CITY PROVIDED ALL THESE NOTICES.
25 THAT'S NOT A MYSTERY. THAT'S NOT NEW INFORMATION.
26 THEY ARE DEALING WITH IT.

27 THIS IS A HARD SITUATION. WE'RE WORKING HARD
28 TO SOLVE IT. AND WE'RE OPEN TO CONTINUING TO WORK WITH

1 ALL THE PARTIES TO ACHIEVE A SUCCESS HERE.

2 THE COURT: I WANT TO MOVE TO A DIFFERENT
3 TOPIC THAT HAS TO DO WITH ADMINISTRATIVE CHALLENGES
4 THAT WILL BE PRESENTED, EVEN ASSUMING THAT THE
5 SETTLEMENT TALKS COME TO FRUITION. YOU'VE GOT
6 SOMETHING LIKE 1700 NEWLY NAMED CROSS-DEFENDANTS,
7 CORRECT, MR. HAGERTY?

8 MR. HAGERTY: IT'S 1300. YES, YOUR HONOR.

9 THE COURT: SO 1300. IS THERE A WAY TO GET TO
10 A FINAL CONSENSUS SETTLEMENT BY JUDGMENT IF WE DON'T
11 HAVE ALL 1300 OF THOSE NAMED PARTIES WITH DISCLAIMERS
12 OR APPEARANCES OR DEFAULTS?

13 MR. HAGERTY: TO GET TO THE JUDGMENT, WE HAVE
14 TO CLEAR UP ALL THOSE ISSUES, YOUR HONOR. BUT PART OF
15 THE REASON WHY WE ASKED FOR THE EXTENSION, IS THAT
16 THERE ARE MANY PARTIES WHO MAY BE WILLING TO EITHER
17 HAVE A DISCLAIMER OR HAVE A DEFAULT TAKEN AGAINST THEM;

18 OR OTHERWISE SUBJECT THEMSELVES TO THE
19 JUDGMENT, IF THEY UNDERSTAND AND SEE WHAT THE JUDGMENT
20 WILL LOOK LIKE, WHICH IS -- WHAT MR. MELNICK TALK ABOUT
21 IS TRUE. WE WILL HAVE TO EXPLAIN THIS TO THE COMMUNITY
22 AND DEMONSTRATE TO THE COMMUNITY THAT THIS IS SOMETHING
23 THEY CAN LIVE WITH AND IS ULTIMATELY IN THEIR INTEREST.

24 BUT TECHNICALLY, YES. THE JUDGMENT WILL HAVE
25 TO RESOLVE ALL OF THESE ISSUES. THERE WILL BE
26 DEFAULTS, THERE WILL BE DISCLAIMERS, PEOPLE WILL ANSWER
27 AND HOPEFULLY CONCUR AND STIPULATE TO THE JUDGMENT. IT
28 MAY BE THAT PEOPLE OBJECT. AND THERE'S A PROCESS BY

1 WHICH THE COURT WILL HAVE TO HEAR THOSE OBJECTIONS.

2 THE COURT: SO IN THE INTERIM, MR. HAGERTY,
3 YOU AND YOUR STAFF AT BEST, BEST AND KRIEGER ARE GOING
4 TO HAVE TO BE VERY METHODICAL IN TRACKING THE STATUS OF
5 EACH OF THOSE NAMED CROSS-DEFENDANTS AND WHETHER THEY
6 HAVE APPEARED BY AN ANSWER, OR OTHERWISE GIVEN YOU A
7 WRITTEN FINAL DISCLAIMER, OR WHETHER OR NOT ON SOME
8 DATE CERTAIN BEEN ABLE TO TAKE THE DEFAULT.

9 MR. HAGERTY: CORRECT, YOUR HONOR.

10 THE COURT: AS TO THE PERSONS WHO'S INTERESTED
11 AND LIMITED TO THOSE WHO ARE GROUNDWATER USERS,
12 POTENTIAL GROUNDWATER USERS, ALL YOU HAVE TO DO IS
13 PROVE TO THE COURT'S SATISFACTION THAT YOU GAVE NOTICE
14 TO A HUNDRED PERCENT OF ALL THOSE PARTIES?

15 MR. HAGERTY: CORRECT, YOUR HONOR.

16 THE COURT: NOT 94 PERCENT OR 96 PERCENT OR
17 99.2 PERCENT, BUT A HUNDRED PERCENT OF THOSE PARTIES.

18 MR. HAGERTY: WHAT IT WOULD DO, YOUR HONOR, IS
19 AS TO THE PARTIES WHO WE CAN DEMONSTRATE RECEIVED THE
20 NOTICE, OR AS YOU RECALL, AND AS THE COURT POINTED OUT
21 AT I THINK OUR FIRST APPEARANCE, THERE'S A POSTING
22 PROCESS THAT WE WILL HAVE TO GO THROUGH AT SOME LEVEL.

23 AS TO ALL THOSE PARTIES, JURISDICTION WILL
24 EXTEND TO THOSE PARTIES, REGARDLESS OF IF THEY APPEAR
25 OR NOT, AS LONG AS WE CAN DEMONSTRATE THAT THE NOTICE
26 WAS PROVIDED. THAT'S WHAT THE STATUTE SAYS.

27 THE COURT: I HAVE TO DETERMINE THAT YOU'VE
28 GIVEN A HUNDRED PERCENT NOTICE, AT LEAST BY POSTING, OF

1 ALL THOSE INTERESTED PARTIES BEFORE JUDGMENT IS
2 ENTERED.

3 MR. HAGERTY: YOU WILL HAVE TO MAKE THE
4 DETERMINATION THAT WE FOLLOWED THE NOTICE AND
5 PROCEDURES IN THE STATUTE.

6 THE COURT: AND THAT YOU NOW HAVE RETURN
7 RECEIPT FROM 92 PERCENT OF THEM AND HAVE PROVEN POSTING
8 FOR 8 PERCENT OF THEM?

9 MR. HAGERTY: YES, YOUR HONOR.

10 THE COURT: DO ANY OF YOU WHO ARE
11 SOPHISTICATES IN THESE CASES KNOW WHAT IS NORMALLY
12 CONSIDERED AN ACCEPTABLE MODE OF PROOF OF THAT?

13 MR. HAGERTY: THE STATUTE SPECIFIES THAT WE
14 NEED TO GET THE RETURN RECEIPTS AND THEN ESSENTIALLY
15 FILE WITH THE COURT PROOF OF THAT PROCESS.

16 THE COURT: WILL YOU BE FILING ALL THE RETURN
17 RECEIPTS THAT YOU GET WITH THE COURT IN DUE COURSE?

18 MR. HAGERTY: YOUR HONOR, LET ME TAKE LOOK.

19 THE COURT: OR PROVIDE IN SOME FASHION.

20 MR. HAGERTY: I BELIEVE IT'S JUST THAT WE WILL
21 REQUIRE TO FILE -- GIVE ME A SECOND, YOUR HONOR.

22 THE COURT: SOME OF THIS IS GOING -- AT LEAST
23 IF IT'S SOMETHING OTHER THAN A SUMMARY RENDITION OF IT,
24 THEN YOU'RE THE ONE WHO'S OBVIOUSLY TRYING TO GET AN
25 ENFORCEABLE JUDGMENT.

26 SO IF YOU'RE CUTTING CORNERS AND I COOPERATE,
27 IN THE SHORT RUN I MIGHT LOVE THE IDEA OF COOPERATING
28 WITH A MORE LABOR-SAVING TECHNIQUE; BUT IF YOU GET A

1 VOID OR VOIDABLE JUDGMENT, YOU'RE NOT DOING MUCH FOR
2 YOUR CLIENT, MR. HAGERTY.

3 BY THE SAME TOKEN, IF I'M SUPPOSED TO GO
4 THROUGH THOUSANDS OF RETURN RECEIPT REQUESTS AND
5 COMPARE THEM WITH SOME TABLE OF WHAT THE APNS ARE AND
6 WHETHER THERE'S BEEN PROPER SERVICE, THAT'S GOING TO
7 TAKE ME A WHILE TO DO THAT LEVEL OF DETAIL WORK. NOT
8 TO MENTION THEN TRYING TO RUN DOWN THE DISCLAIMER AND
9 TRYING TO RUN DOWN THE DEFAULTS.

10 REMIND ME, HOW MANY PEOPLE WHO ARE GETTING
11 NOTICES ARE ONLY GROUNDWATER INTERESTED PARTIES?

12 MR. HAGERTY: THE NOTICE OF ONLY GROUNDWATER
13 ARE ABOUT 12,000 -- ALMOST 13,000, YOUR HONOR.

14 THE COURT: SO IN THEORY, YOU'RE GOING TO HAVE
15 TO PROVE YOU GAVE -- I'LL TAKE 12,700 AS THE
16 APPROXIMATION OF GOOD NOTICES. AND IF YOU PROVE UP
17 12,500, DO WE WORRY ABOUT THE LAST 200? OR TAKE
18 JUDGMENT THAT'S VOID OR VOIDABLE AS TO THOSE 200. AND
19 THEN WHEN IT COMES TO DIGGING THROUGH THE WELL
20 THOUSANDS OF GALLONS A DAY --

21 MR. HAGERTY: YOUR HONOR, WE WILL PROVE UP
22 THAT THE NOTICE WAS PROVIDED. AND IF WE'RE ABLE TO
23 PROVE THAT UP PURSUANT TO THE STATUTE, THE JUDGMENT
24 WILL APPLY TO EVERYONE WE CAN DEMONSTRATE RECEIVED THE
25 NOTICE.

26 THE COURT: WILL YOUR PROOF TO ME BE
27 PARCEL-BY-PARCEL, OR AM I SUPPOSED TO TAKE A SUMMARY
28 STATEMENT OF SHAWN HAGERTY, THAT SAYS, BELIEVE ME WE,

1 SERVED THEM ALL AND WE GOT 11,300 RETURN RECEIPTS BACK,
2 AND WE HAVE 782 DISCLAIMERS, AND WE HAVE TAKEN DEFAULT
3 ON THE FOLLOWING 84 NAMED PERSONS.

4 MR. HAGERTY: CAN WE SEGREGATE THE DISCLAIMER
5 -- THE DISCLAIMER PART, I THINK, IS FAIRLY
6 STRAIGHTFORWARD. I THINK THE DEFAULT PART IS FAIRLY
7 STRAIGHTFORWARD.

8 THE COURT: ACTUALLY THE DISCLAIMER
9 ASSOCIATES WITH THE RIPARIAN.

10 MR. HAGERTY: YES. BUT IT COULD BE -- WELL,
11 THAT'S CORRECT. IT WOULD BE ONLY RIPARIAN OR NAMED
12 GROUNDWATER USERS.

13 THE COURT: REMIND ME. NAME AND NAMED
14 GROUNDWATER KNOWN TO HAVE A WELL?

15 MR. HAGERTY: YES, YOUR HONOR. WHEN WE FIRST
16 FILED IN OUR ORIGINAL CROSS-COMPLAINT.

17 THE COURT: IF YOU HAVE REASON TO BELIEVE THEY
18 HAVE AN AVAILABLE WELL, THEY GET NAMED.

19 MR. HAGERTY: WE NAMED THEM, YES.

20 THE COURT: CONTINUE.

21 MR. HAGERTY: SO WHAT THE STATUTES SAYS, YOUR
22 HONOR -- AND WE'RE LEARNING A LOT ABOUT THE STATUTE,
23 AND TREADING NEW GROUND HERE.

24 THE COURT: IT'S YOUNGER THAN THIS CASE.

25 MR. HAGERTY: EXACTLY. IT SAYS, "AFTER
26 COMPLETING THE MAILING, THE PLAINTIFF SHALL FILE WITH
27 THE COURT A NOTICE OF COMPLETION OF THE MAILING." SO
28 THAT'S THE GUIDANCE WE HAVE.

1 THE COURT: AND THAT'S ON SUMMARY.

2 MR. HAGERTY: YES. AND WE HAVE THE BACKUP.
3 AND WE'RE KEEPING TRACK OF ALL THOSE THINGS. WE WILL
4 DO WHAT WE NEED TO DO AT THE LEVEL OF PROOF THE COURT
5 NEEDS. AND WE WILL DEMONSTRATE TO THE COURT THAT THE
6 NOTICE WAS PROVIDED.

7 THE COURT: I'M NOT SURE I WANT TO DRAG YOU
8 DOWN TO THE WEEDS, UNLESS YOU TELL ME, HEY, THE
9 JUDGMENT I NEED FOR WHAT YOUR CLIENT IS PAYING ME
10 REQUIRES YOU TO AUDIT ME DOWN TO THE LEVEL OF DETAIL;
11 BUT IF I HAVE TO BE AT THAT LEVEL OF DETAIL, I SORT OF
12 NEED A HEADS UP TO FIND THE TIME AND ENERGY AND STAFF
13 SUPPORT TO BE ABLE TO FOLLOW YOU THROUGH THE MINUTIA OF
14 RUNNING DOWN 15,000 ARE ALL THE BOX BUBBLED IN.

15 MR. HAGERTY: OUR POSITION IS THAT YOU WON'T
16 HAVE TO GET TO THAT LEVEL OF DETAIL, ALTHOUGH WE WILL
17 HAVE THE LEVEL OF DETAIL. BECAUSE WE DO. WE ARE
18 KEEPING TRACK. WE KNOW EXACTLY WHO'S RECEIVED, WHO'S
19 RETURNED THE NOTICE. WE KNOW WHO HASN'T.

20 WE'RE WORKING THROUGH THE PROCESS OF THEM.
21 SOME OF THEM ARE MULTIPLE OWNERS OF A SINGLE PARCEL.
22 SO THE NUMBER WE MAY HAVE TO POST WILL BE LESS THAN THE
23 NUMBER OF NON-RESPONSIVE NOTICES THAT WE'VE SENT OUT,
24 WHICH IS 2000, 3000, I BELIEVE.

25 THE COURT: HAS ALL THE MAIL BEEN SENT?

26 MR. HAGERTY: YES, YOUR HONOR.

27 THE COURT: DO YOU HAVE A PERCEPTION SO FAR OF
28 WHAT PERCENTAGE ARE COMING BACK WITH A SUCCESSFUL

1 RETURN RECEIPT CONFIRMATION?

2 MR. HAGERTY: YES. WE HAVE ABOUT 83 PERCENT
3 SUCCESS. WE'RE CONFIDENT WE WILL COMPLY FULLY WITH THE
4 STATUTE.

5 THE COURT: DO YOU THEN RE-MAIL AFTER YOU
6 CHECK ADDRESSES?

7 MR. HAGERTY: WE'RE WORKING THROUGH THAT ISSUE
8 RIGHT NOW, YOUR HONOR. BECAUSE GIVEN WHAT MR. MELNICK
9 MENTIONED EARLIER, THE IDEA OF POSTING 2000 PROPERTIES
10 IN THE CITY OF OJAI OR ELSEWHERE, IS NOT SOMETHING
11 WE'RE INTERESTED IN DOING AT THE MOMENT.

12 THE COURT: MAKE A LOT OF VOTERS HAPPY.

13 MR. HAGERTY: WE'RE TRYING TO FIGURE OUT THE
14 BEST AND MOST EFFICIENT WAY TO ADDRESS THIS. BUT
15 ULTIMATELY, WE WILL COMPLY WITH THE STATUTE. BECAUSE
16 WHY WE'RE BEARING THE PAIN, IS TO GET THE COURT TO HAVE
17 JURISDICTION OVER THE WATERSHED. THAT'S EXACTLY WHAT
18 WE'RE DOING.

19 THE COURT HAS REMINDED US A NUMBER OF
20 OCCASIONS THAT THIS IS CRITICAL. WE BELIEVE IT'S
21 CRITICAL, ABSOLUTELY. WE'RE GOING TO DO WHAT WE NEED
22 TO DO TO MAKE SURE THE COURT HAS JURISDICTION.

23 THE COURT: OKAY. YOU'VE ANSWERED MY
24 QUESTIONS, MR. HAGERTY. THE MAIN MESSAGE IS IF OUR
25 RECORDS SHOW ERRORS, YOU CAN SHARE WITH US SO WE CAN
26 TRY TO FIX THEM.

27 MR. HAGERTY: YES.

28 THE COURT: BECAUSE AT THE END OF THE DAY, YOU

1 WANT OUR RECORDS TO BE AS CLEAR AND ACCURATE AS
2 POSSIBLE TO CONFIRM WHAT YOU BELIEVE YOU'VE
3 ACCOMPLISHED, WHICH IS DEMONSTRABLE GOOD NOTICE IN THE
4 PUBLIC FILE OF ALL THESE PEOPLE WHO ARE GOING TO GET
5 MAIL.

6 SO YOU HAVE AN INTEREST IN THE CORRECTNESS OF
7 OUR RECORDS. IF MY STAFF OR I HAVE TO DO TEDIOUS
8 THINGS, LIKE PROCESS A THOUSANDS DEFAULTS, THAT DOES
9 NOT HAPPEN IN AN AFTERNOON.

10 MR. HAGERTY: YES, YOUR HONOR. WE UNDERSTAND
11 THAT.

12 IF I MAY, I WOULD ENCOURAGE, AS I DID EARLIER,
13 IF OTHER PARTIES HAVE QUESTIONS OR THERE ARE DETAIL
14 ISSUES, WE'RE HERE TO HELP ANSWER THOSE QUESTIONS. AND
15 WE ENCOURAGE PEOPLE TO CONTACT US. BECAUSE WE WOULD
16 LIKE TO WORK THIS OUT IN THE MOST EFFICIENT WAY
17 POSSIBLE.

18 THE COURT: MR. MELNICK, IS SEEMS LIKE
19 SOMETHING CAME TO YOUR MIND.

20 MR. MELNICK: YOUR HONOR, I JUST WANTED TO
21 ASSURE YOU THAT THE STATUTE DOES NOT IMAGINE THE COURT
22 GOING THROUGH A LIST OF 12,000 APNS, AND ENSURING THAT
23 EACH OF THOSE PEOPLE GOT A NOTICE.

24 WHAT THE STATUTE REQUIRES IS THAT SUFFICIENT
25 NOTICE BE GIVEN SO THAT IT BECOMES AN IN REM ACTION.
26 AND SUFFICIENT NOTICE MEANS, I THINK WHAT THE CITY OF
27 VENTURA IS DOING, IN PROVING THAT TO YOU, WHICH IS THEY
28 GOT A LIST OF PROPERTY OWNERS, IT WAS A COMPLETE LIST,

1 HERE'S HOW THEY VERIFIED IT WAS A COMPLETE LIST.

2 THE COURT: THE PUBLIC ASSESSOR'S RECORDS
3 OUGHT TO BE ACCURATE.

4 MR. MELNICK: RIGHT. THEY SENT TO EVERYONE,
5 HERE'S WHAT THEY DID TO FOLLOWUP, HERE'S WHEN THEY
6 POSTED, ET CETERA, ET CETERA. AND THAT YOU KNOW IN
7 SUFFICIENT DETAIL, WHICH I ASSUME MR. HAGERTY WILL DO
8 THAT, SHOULD BE ENOUGH FOR YOU TO POSSESS IN REM
9 JURISDICTION HERE.

10 THE COURT: OKAY. SO WE HAVE A DATE, I GUESS,
11 NOT UNTIL MAY, BUT OKAY. HE GOT YOUR BULLETIN BOARD.
12 ANYTHING ELSE I CAN DO TO HELP YOU THIS AFTERNOON,
13 MR. COOPER.

14 MR. COOPER: NO, YOUR HONOR. THANK YOU.

15 THE COURT: MR. HAGERTY?

16 MR. HAGERTY: NO, YOUR HONOR. THANK YOU.

17 THE COURT: MR. MELNICK. MR. KRASNER?

18 MR. KRASNER: NO, YOUR HONOR. THANK YOU.

19 THE COURT: MR. HAGERTY, WILL YOU BE KIND
20 ENOUGH TO GIVE NOTICE?

21 MR. HAGERTY: YES, YOUR HONOR.

22 THE COURT: ANYONE ELSE WISH TO BE HEARD
23 BEFORE WE RECESS? HEARING NOTHING. THE COURT IS IN
24 RECESS.

25 MR. HAGERTY: THANK YOU, YOUR HONOR.

26 MS. BUCKMAN: THANK YOU, YOUR HONOR.

27 MR. COOPER: THANK YOU, YOUR HONOR.

28 (PROCEEDINGS ADJOURNED AT 3:02 P.M.)

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

DEPARTMENT 10 HON. WILLIAM F. HIGHBERGER, JUDGE
 SANTA BARBARA CHANNELKEEPER,)
)
 PLAINTIFF,)
)
 VS.) CASE NO.
) 19STCP01176
 STATE WATER RESOURCES CONTROL)
 BOARD, ET AL.,)
)
 DEFENDANTS.)

I, AURORA BOWSER, OFFICIAL REPORTER
PRO TEMPORE OF THE SUPERIOR COURT OF THE STATE OF
CALIFORNIA, FOR THE COUNTY OF LOS ANGELES, DO HEREBY
CERTIFY THAT I DID CORRECTLY REPORT THE PROCEEDINGS
CONTAINED HEREIN AND THAT THE FOREGOING PAGES 1 THROUGH
54, COMPRISE A FULL, TRUE AND CORRECT TRANSCRIPT OF
THE PROCEEDINGS AND TESTIMONY TAKEN IN THE MATTER OF
THE ABOVE-ENTITLED CAUSE ON FEBRUARY 27, 2020.

EXECUTED THIS DAY, MARCH 3, 2020, AT
LOS ANGELES, CALIFORNIA.

<%16372,Signature%>

AURORA BOWSER, CSR NO. 12801

A			
A-GO 33:18	22:26 23:2	38:16	APPLY 49:24
ABILITY 38:15	ADMIT 18:10 37:9	ANGELES 1:2 2:10	APPRECIATE 12:16
ABLE 18:22 23:2,2	ADOPT 7:15	2:21 3:6 4:5 45:7	38:2
27:10,18 32:5,8 47:8	ADVANCE 27:6	55:2,15,23	APPROACH 36:20
49:22 51:13	41:23	ANGRY 39:15 40:7,8	APPROPRIATE
ABOVE-ENTITLED	ADVISED 28:4,11	ANSWER 9:14,16,27	10:28 33:5 35:26
55:20	AFFIRMATIVELY	10:1 11:11,25 12:2,5	41:14
ABSOLUTELY	18:14	12:24 13:3,24 14:13	APPROVED 44:27
23:16 45:22 52:21	AFTERNOON 4:15	14:13,22 15:2,5,12	45:10
ACCEPTABLE	4:23,26 5:1,4 16:5	16:10,25 17:8 18:1	APPROXIMATELY
48:12	26:4 31:5 34:5 53:9	18:22,28 19:13,23	30:17
ACCESS 28:22 45:9	54:12	20:22 22:22 24:19	APPROXIMATION
ACCOMPLISH 6:22	AG'S 31:28	24:21 26:1,3 43:18	49:16
27:10	AGE 32:22,23 38:14	46:26 47:6 53:14	APRIL 30:6,13,16,16
ACCOMPLISHED	AGGREGATE 22:10	ANSWERED 17:24	AREA 23:22,23 43:3
53:3	AGO 27:28	18:17 52:23	43:4
ACCOUNT 12:10	AGREE 5:27 9:21	ANSWERING 17:5	ARRANGEMENT
ACCOUNTABLE	15:22 20:22 29:26	ANSWERS 12:28	13:19
39:27	39:25 41:5	13:20 20:14,26 27:2	ARRANGEMENTS
ACCURATE 20:10	AGREEABLE 7:15	ANTICIPATE 27:25	43:16
24:3 53:1 54:3	8:14	ANTICIPATED 15:3	ARRIVAL 26:24
ACHIEVE 45:18 46:1	AGREED 29:3 30:13	ANTON 2:26	ASBESTOS 30:14,19
ACT 14:17	44:8	ANYBODY 10:4	34:26
ACTION 9:25 14:28	AGREEMENT 36:12	12:17 29:27 38:6	ASIDE 31:26
21:7 53:25	43:15	40:28	ASKED 7:13 46:15
ACTIONS 21:11	AHEAD 23:9 37:26	ANYWAY 41:18	ASKING 8:24 10:15
44:19	AL 1:8 55:8	APART 29:8 31:20	11:28 39:8,9
ACTIVITIES 36:12	ALIVE 23:25,28	APNS 49:5 53:22	ASSESSOR'S 54:2
ACTUAL 15:13	ALLOCATE 38:9	APPARENTLY 21:20	ASSOCIATED 17:1
ADD 12:6 25:18,21	ALLOCATION	38:23	ASSOCIATES 50:9
28:9 37:12	44:27 45:1,3,8	APPEAR 5:14 17:14	ASSUME 38:17 54:7
ADDED 21:11	ALLOW 7:24 13:22	19:18,18 47:24	ASSUMING 46:4
ADDITION 24:7	ALLOWED 9:16 35:3	APPEARANCE	ASSURE 53:21
39:13	35:4	10:14,17 13:22	ATTACHED 24:20
ADDITIONAL 21:10	ALLOWS 43:15	16:28 17:16 19:12	ATTENDED 23:24
21:21 29:25	ALTERNATIVE	19:13,22 22:13	ATTORNEY 3:4,10
ADDRESS 24:21,23	15:3 20:16 24:19	47:21	5:2
28:13 52:14	42:27	APPEARANCES	AUDIT 51:10
ADDRESSES 52:6	ALTERNATIVELY	1:16 2:1 3:1 4:7	AURORA 1:27 4:8
ADJOURNED 54:28	20:25	46:12	55:13,27
ADJUDICATION	ALTERNATIVES	APPEARED 1:19,24	AVAILABILITY
14:17 24:10	29:21,23	2:14 10:9 24:25 47:6	34:2,6,21
ADMINISTRATIVE	AMENABLE 7:19	APPEARING 6:9	AVAILABLE 30:9
16:25 46:3	AMEND 11:28 12:7	9:20 10:11 20:15	31:7,23 50:18
ADMINISTRATOR	AMENDED 15:1	APPEARS 19:11,12	AVENUE 1:19 2:9
	AMERICA 30:26	19:14,21 30:8	AVERAGE 38:10
	AMOUNT 33:15	APPLICATION 8:10	AVOID 13:16 14:12

23:4 AVOIDANCE 35:18 AVOIDS 15:5 AWARE 22:5 40:26 42:11	BLANKS 8:16 BLATZ 2:13,14 12:19 12:19 13:9,16,18 18:17,19 19:24 BLATZLAWFIRM... 2:17 BOARD 1:8 3:8 4:4 4:14 5:3 30:3 33:7 38:1 54:11 55:8 BOOKING 33:24 BOULEVARD 2:26 BOULTEN 2:12,12 BOWSER 1:27 4:8 55:13,27 BOX 8:13 51:14 BRAD 4:27 BRADLEY 2:20 BREAK 31:27 32:6 BRIDGE 32:5 BRIEFING 36:27 42:13 BROADWAY 2:4 BROWNSTEIN 2:19 4:27 BU 25:10 BUBBLED 51:14 BUCKMAN 1:23 6:6 6:8,8,13 7:14,18 54:26 BUENAVENTURA 2:2,7 4:21 5:17 BUILD 45:10 BULLETIN 54:11 BUNDLING 25:5 BURDENING 14:5 BUY 43:11	CALLED 30:25 CALLS 29:6 CANCEL 29:11 CAPTION 8:13 9:15 11:6,27,28 14:15,28 CARE 10:2 CAREFUL 13:10 CARMICHAEL 30:25 CASE 1:7 4:1,2 10:14 12:15 13:28 14:20 20:9,10 21:11 26:15 26:22 27:25 28:6 30:25 32:26 34:16 35:11 38:19 50:24 55:7 CASES 48:11 CASITAS 2:23 4:24 32:12,20 39:27 43:2 43:6,9,9,13,14 44:27 CASITAS' 32:23 CAT 37:14 CAUSE 55:20 CAVEAT 35:22 CELEBRATE 31:4 CENTURY 2:20 CEQA 45:11 CERTAIN 5:24 7:1,2 7:6 10:28 20:25 30:22,22 47:8 CERTAINLY 24:4 26:23 32:19 CERTIFY 55:16 CETERA 54:6,6 CHALLENGE 16:26 17:13 CHALLENGES 20:11 46:3 CHAMBER 40:21 44:16 CHAMBERS 38:7 CHANCE 35:10 CHANGE 28:23 30:10 CHANNELKEEPER 1:5 4:2,13,15,17 21:8 35:28 36:2,3,4	36:15 37:7 41:3 42:12 44:7,10 55:5 CHANNELKEEPE... 36:23 CHAPTER 19:8 CHARACTER 20:14 36:28 CHARACTERISTIC 26:25 CHARACTERIZA... 21:13 CHARACTERIZA... 20:19 CHARACTERIZE 20:21 21:2 CHARACTERIZED 20:26 21:10 CHECK 5:13 52:6 CHOICE 10:21 CHOICES 30:20 CHOOSE 8:5 CHOOSES 19:1 CHRIS 4:21 CHRISTOPHER 2:8 CHRISTOPHER.P... 2:11 CIRCUMSTANCE 19:16 CIRCUMSTANCES 21:2 CITY 1:22 2:2,7 4:21 5:17,23,25,27 6:3,4 6:5,9,21 7:14 8:1,9 8:21 11:16 16:7,26 18:5 23:28 24:8 34:24 35:3 39:24,25 39:25 40:10,13 41:19 42:15,23 43:5 43:19 44:12,25 45:7 45:24 52:10 53:26 CLARIFY 6:26 13:27 CLARK 2:12 CLASSIFIED 10:20 CLAY 3:11 CLEANUP 14:4 CLEAR 9:28 15:18 16:11 25:5 37:1,7
<hr/> B <hr/>			
B 2:14,25 BACK 15:8,16 24:11 28:3 29:20 30:7,13 31:6 33:26 34:1,11 50:1 51:28 BACKUP 51:2 BARBARA 1:5 4:2,12 4:14 21:7 55:5 BARTKIEWICZ 1:23 BASED 17:2 BASIC 41:11 BEAR 13:6 BEARING 52:16 BEAUTIFUL 24:17 BECKER 2:12 BEGGED 39:9 BEHALF 4:28 5:3 BELIEVE 5:22,26 6:15 12:11 13:1 29:2 32:25 44:6 48:20 49:28 50:17 51:24 52:20 53:2 BELIEVES 11:20 BENEFICIAL 37:16 41:15 43:28 BENEFIT 7:22 8:21 25:28 43:6 BENEFITS 33:11,13 BENJAMIN 16:2,5,6 16:7,7 26:2,4 BEST 2:3,3,8,8 24:3 44:20 47:3,3 52:14 BETTER 17:15 32:14 33:14 41:21 42:5 BHERREMA@BH... 2:22 BIOLOGY 29:4 33:4 BIRTHDAY 31:4 BIT 12:15 39:26	<hr/> C <hr/>		
	CALDWELL 2:12 CALENDAR 28:10 29:28 CALIFORNIA 1:1,20 1:25 2:5,10,16,21,27 3:2,3,6,9,12 4:5 26:17 55:1,15,23 CALL 1:19,24 2:14 14:14 30:24		

46:14 53:1	36:20	CONSOLIDATED	20:28 21:15 22:18
CLEARLY 11:26	COMPLETELY	21:6	28:7 34:8 44:22,25
CLERICAL 14:19	43:23	CONSTITUTIONAL	46:7 47:9,15 50:11
17:13	COMPLETING	36:25	55:18
CLERK 15:7 34:3	50:26	CONSTRUE 10:16	CORRECTLY 55:16
CLERK'S 9:18 21:5	COMPLETION	CONSUMPTIVE	CORRECTNESS
CLERKS 20:25	50:27	33:2 35:25 36:10	53:6
CLIENT 10:13 11:15	COMPLEXITIES	37:18 38:3 42:1	COSGROVE 2:25
12:1 39:14,14,15	17:23	CONTACT 53:15	4:23,24 32:10,11,11
49:2 51:9	COMPLIANCE 8:22	CONTAINED 55:17	32:19,25 33:1 37:12
CLIENT'S 33:17	COMPLICATED	CONTINUE 20:6	37:13
CLIENTS 11:9 13:25	15:8 18:10 43:17	28:24 29:6 32:7 36:2	COSTA 2:27
18:21	45:14	41:4 43:22 50:20	COUNSEL 4:14,19
CLOSE 33:24	COMPLY 52:3,15	CONTINUED 2:1 3:1	5:7 6:2,18 13:26
CLOSELY 18:8 20:12	COMPRISE 55:18	CONTINUING 38:15	14:6 18:9,11 22:4
22:25	COMPROMISE	45:28	24:1 27:26
CMC 27:28	33:10,13	CONTRIBUTE 24:2	COUNTERPARTS
CO-OWNERS 25:7	CONCEDE 32:27	CONTROL 1:8 3:8	33:6
CO-TRUSTEES	CONCEIVABLE	4:4,13 5:3 7:23 38:1	COUNTY 1:2 14:8
19:19	26:20	55:8	28:17,23 39:16 43:4
COLLEAGUE 4:22	CONCEPT 44:15	CONVENIENCE	44:23 55:2,15
COME 18:14 30:11	CONCEPTS 41:11	14:9	COUPLE 29:15 32:4
31:26 36:12,19	CONCERN 24:4,5	CONVERSATION	COURSE 48:17
41:16 42:2 46:5	36:4 42:1	20:4	COURT 1:1,19,24
COMES 49:19	CONCERNED 22:21	CONVERSATIONS	2:14 4:12,18,18 5:7
COMING 16:21	38:4	39:10 40:19,19	6:2,5,7,10,14,17,18
39:18 41:28 42:18	CONCUR 6:10 46:27	44:20	7:14,20,21 8:5,8,19
51:28	CONCURRENT 7:28	CONVEY 45:16,17	8:26 9:2,6,7,11,24
COMINGS 34:15	8:9	CONVINCE 39:17	10:4,7,10,15,24 11:4
COMMENTS 11:4	CONDITION 26:23	CONVOLUTED	11:9 12:10,17,26
14:8	CONFERENCE 9:9	12:24	13:3,6,14,20 14:5,7
COMMITMENT	24:12 28:7 29:6	COOPER 1:18,18	15:7,20,25,28 16:6
44:11	30:27 31:1 34:14,17	4:16,17 41:2,3,5	16:15,21,23,27 17:5
COMMITMENTS	34:28 42:11	42:9,10 43:21,25	17:7,12,19,24,28
30:1	CONFESS 26:9	54:13,14,27	18:11,15,17,25,28
COMMUNICATED	CONFIDENT 52:3	COOPER'S 39:14	20:8,24 21:17 22:2,4
45:23	CONFIRM 53:2	COOPERATE 48:26	22:16,20,21,25,27
COMMUNITIES	CONFIRMATION	COOPERATING	23:2,4,9,17,25 24:11
24:6 45:23	52:1	48:27	24:26 25:1,2,6,9,18
COMMUNITY 19:7	CONFUSION 13:16	COOPERATIVE	25:22,26,27 26:6,9
24:7 40:6 46:21,22	CONNECT 44:26	20:5	27:1,6,11,14,20,24
COMPARE 49:5	CONNECTION	COPY 15:13,14	28:1,3,9,14,15,20,26
COMPLAINT 14:27	44:24 45:9	CORE 39:1	29:11,20,27 30:3,22
15:1 17:27 21:1	CONSENSUS 35:7	CORNER 38:5	31:12,13 32:3,17,22
COMPLETE 18:5,16	46:10	CORNERS 48:26	32:27 33:21,26 34:2
53:28 54:1	CONSIDERED 48:12	CORRECT 5:21 8:7	34:4,13,22,25 35:2,9
COMPLETED 18:6	CONSIDERS 41:25	13:15 18:2 20:19,20	35:14,17,27 37:12

37:23,26,28 38:8,22 39:2,5,20,24 40:8,12 40:16,22,28 41:4,24 42:7,10,22 43:5,10 44:2,22 45:1,6,16 46:2,9 47:1,2,10,16 47:20,27 48:6,10,15 48:16,17,19,22 49:14,26 50:8,13,17 50:20,24,27 51:1,4,5 51:7,25,27 52:5,12 52:16,19,22,23,28 53:18,21 54:2,10,15 54:17,19,22,23 55:1 55:14	CRY 26:19 CSR 1:27 4:8 55:27 CURIOSITY 23:10 CURRENT 8:23 42:14 CURRENTLY 45:11 CUTTING 48:26	49:9 53:8 DEFENDANT 2:7 20:17 DEFENDANTS 1:9 30:19 55:9 DEFINED 11:6 DEFINITELY 25:16 DELIBERATING 34:26 DELIGHTED 40:22 DEMAND 38:12 DEMANDS 37:17 DEMONSTRABLE 53:3 DEMONSTRATE 46:22 47:19,25 49:24 51:5 DEPARTMENT 1:4 3:2,4,10 4:6 5:5 33:7 55:4 DEPARTURE 31:11 DEPENDS 39:25 DESIGNATED 12:5 DESIRE 6:23 13:3 DESTINATION 30:12 DETAIL 49:7 51:10 51:11,16,17 53:13 54:7 DETAILED 36:6 DETAILS 10:28 13:10,27 37:6,9 DETERMINATION 48:4 DETERMINE 47:27 DEVOLVE 44:4 DIALOG 29:25 DIEGO 2:5 30:28 DIFFERENCE 6:25 6:28 DIFFERENCES 32:15 33:9 DIFFERENT 7:5 16:28 19:6 27:9 30:12 32:4 35:17 38:14 46:2 DIGGING 49:19	DIRECTLY 26:18 39:27 DISAGREE 29:27 41:9 DISCLAIMER 24:28 46:17 47:7 49:8 50:4 50:5,8 DISCLAIMERS 46:11,26 50:2 DISCLAIMING 25:7 DISCLOSURES 24:25 DISCOVERED 38:23 DISCUSS 36:22,23 DISCUSSION 28:2 DISCUSSIONS 36:7 36:8,9 44:10 DISTINGUISH 9:19 DISTINGUISHAB... 15:6 DISTRICT 2:24 4:25 32:21 39:21,27 43:9 45:7 DIVERSE 37:17 DIVERTS 43:13 DOCKET 21:9 26:25 DOCKETS 26:26 DOCUMENT 27:9 35:7 DOCUMENTS 7:2 DOING 35:20 42:15 49:1 52:11,18 53:27 DOWNPLAY 36:16 DRAG 51:7 DRIES 41:19 DRIVE 22:2 DRY 41:17,25 DUE 7:4 11:20 30:13 35:3 48:17 DUPLICATE 22:11 DUTY 36:25 DYNAMIC 40:27
COURT'S 18:4 36:25 47:13 COURT-APPROV... 9:14 15:4 24:21 COURTESIES 25:23 COURTROOM 28:17,19 30:24 COVID-19 30:4 CREATED 40:20 CRITICAL 36:14,15 52:20,21 CROSS-ACTIONS 21:11 CROSS-COMPLAI... 27:12 CROSS-COMPLAI... 21:14 CROSS-COMPLAI... 14:3,16 15:24,26,27 50:16 CROSS-DEFENDA... 1:22 2:2,18,23 3:2 14:12 20:17,22 21:14 CROSS-DEFENDA... 2:12 11:5 12:20 21:22,26,28 22:5,6 22:13 24:13 26:16 46:6 47:5 CROSS-RESPOND... 20:27 CRUCIAL 18:5	<hr/> D <hr/> D 2:3 DAKOTAH 16:2,6,7 26:2 DAM 32:22,24 DANIEL 1:18 4:16 DANIEL@COOPE... 1:21 DARK 30:16 DATA 23:5 41:13 DATABASE 21:25 DATE 7:1,2,4,6,12 8:15 30:22 34:1,11 34:16 47:8 54:10 DATES 27:25 31:9 DAUNTING 20:10 DAVID 2:25 4:24 6:16 10:8 32:11 DAY 27:26 28:12,25 29:12 30:15,20 31:6 31:13 32:13 33:18 34:8 49:20 52:28 55:22 DAYS 33:26 DCOSGROVE@R... 2:28 DEAD 26:24 DEADLINE 8:22,24 DEADLINES 5:24 DEAL 17:21 20:3 DEALING 45:26 DEALT 23:16 DEBATE 23:15 DECIDES 41:14 DECIDING 32:2 DECISIONS 44:18 DEFAULT 46:17 47:8 50:2,6 DEFAULTS 46:12,26	<hr/> E <hr/> EARLIER 45:23 52:9 53:12 EARLY 21:27 22:12	

41:17	34:6 43:4 48:14	FARBER 2:19 4:27	FISHERY 37:15
EASIEST 12:26	ESTATE 26:18	FASHION 48:19	FIST 14:18
EAST 2:20 31:6	ET 1:8 54:6,6 55:8	FAVORED 22:12	FIT 31:18
ECHO 38:7 40:21	EVENT 28:11,16 34:7	FEBRUARY 1:14 4:5	FIX 52:26
41:28 44:15	EVERYBODY 23:25	5:17 55:20	FLAG 14:14
ECOLOGY 29:4	37:20	FEE 11:21 19:4,12,13	FLAGGED 20:15
EDGE 11:21	EVERYONE'S 13:21	25:2 26:6,11,12,14	FLOOR 2:4,9 3:12
EDITED 24:14	20:3	26:24	FLOW 38:10 44:8
EDUCATIONAL	EVOLVED 30:25	FEEDS 43:14	FLows 41:14
23:18	EX 6:11,14,20,21 7:21	FEEL 33:12	FLYING 30:5
EFFICIENT 7:1,6,12	7:24,28,28 8:9,20	FEES 18:24 19:22	FOLLOW 51:13
37:22 52:14 53:16	9:2	25:23,25 26:8	FOLLOWED 48:4
EFFICIENTLY 13:4	EXACTLY 17:25	FELT 27:26	FOLLOWING 14:7
EFFORT 21:20 33:8	50:25 51:18 52:17	FIGHT 14:18 44:4	50:3
33:15 38:2	EXCEL 21:21 22:16	FIGHTING 38:8	FOLLOWS 25:27
EITHER 13:20 42:14	EXECUTED 55:22	FIGURE 38:9,10	FOLLOWUP 12:21
46:16	EXISTING 38:24	52:13	54:5
ELECTION 18:3	42:14 45:8	FIGURED 20:7	FOOL'S 39:12
ELECTRONIC 22:9	EXPECT 22:11,28	FILE 5:24 12:28 13:2	FOREGOING 55:17
ENCOUNTERED	27:15 42:5	13:25 15:18,20	FORESEEABLE
25:17	EXPEDITE 23:4	18:22 25:17,27 26:7	19:16
ENCOURAGE 53:12	EXPENSE 33:15	26:28 27:4,8,19 35:4	FORM 7:15 8:27 9:16
53:15	EXPLAIN 46:21	48:15,21 50:26 53:4	9:24,27 10:1,21 11:1
ENERGY 51:12	EXTEND 47:24	FILED 5:16 7:25 8:11	11:11,13,25 12:4,24
ENFORCEABLE	EXTENDING 44:11	27:2 34:20 50:16	13:3,20 14:13,13,22
48:25	EXTENSION 24:24	FILES 18:27	15:2,5,12 16:10 18:1
ENGAGE 37:21	46:15	FILING 10:22 14:3	20:14,21,25 22:22
ENGAGED 30:18	EXTENSIONS 5:23	17:7 18:24 19:4	44:20
36:6	EXTRAORDINAR...	20:21 21:10 27:10	FORTH 14:9 15:17
ENSURING 53:22	23:24	48:16	FORTUNATE 31:7
ENTERED 21:24,27		FILINGS 27:15	FORWARD 13:28
22:8 48:2	F	FILL 29:28	27:20 29:21,26
ENTERING 44:7	F 1:4 4:6 18:26 55:4	FILLED 8:16	FOUNDATION 2:18
ENTIRELY 15:17	FACIALLY 26:10	FINAL 25:14 46:10	4:28
ENTITIES 23:11	FACILITIES-REL...	47:7	FOUR 9:5 30:19
39:20	31:2	FINALLY 21:23	FRAMEWORK 37:6
ENTITLED 19:17	FACT 12:11 14:19	FINANCIAL 26:23	37:8 41:10,11
ENTRIES 22:11	19:16 45:24	37:17	FRANCISCO 1:20
ENTRY-LEVEL 15:7	FACTS 12:7	FIND 5:8 30:12 51:12	31:1
ENVELOPE 16:1	FAIR 6:10	FINDS 11:10	FRANKLY 16:25
EQUALLY 21:4	FAIRLY 43:17 50:5,6	FINE 24:27 25:3,7	FREE 25:3
ERRAND 39:12	FAIRNESS 21:5	34:23	FREEMAN'S 30:14
ERROR 23:5	FAITH 44:6	FIRM 2:13	FRIDAY 30:1 34:22
ERRORS 52:25	FALL 41:17,24 42:16	FIRST 9:4 13:7 21:25	35:1
ESQ 1:18,23 2:3,8,14	FAMILY 19:15	35:13 47:21 50:15	FRONT 17:19
2:20,25 3:5,11	FAR 9:11 12:24 21:19	FISH 3:2 5:5 33:7	FRUITION 46:5
ESSENTIALLY 7:16	35:20 51:27	40:4,13 41:15,20,25	FULL 55:18

FULLY 11:2 26:21 52:3	28:22 31:21,22,25 34:27 37:1 39:18 44:6 49:16 53:3	25:24 26:1,27 27:8 27:13,16,22,27 28:8 28:12,18,25 29:13 29:27 31:8 32:1 33:28 34:8,18,19,23 35:7,8,12,16,22 40:23 41:9,16 43:1,7 43:13 44:3,25 45:3,8 46:7,8,13 47:2,9,15 47:18 48:3,9,13,18 48:20 49:2,12,21,28 50:4,10,15,19,21,25 51:2,15,26 52:2,7,13 52:24,27 53:10 54:7 54:15,16,19,21,25	HELPED 35:13 HELPING 35:11 HERDING 37:14 HERETOFORE 4:7 HERREMA 2:20 4:26 4:27 HEY 51:8 HIGH 31:14 HIGHBERGER 1:4 4:6 16:17,20,23 17:1 17:2,4,6,14,18 18:26 18:27 19:5,9,14,21 25:9 55:4 HIGHBERGER'S 16:21 HOLDING 31:20 HON 1:4 4:6 55:4 HONESTLY 26:1 HONOR 4:16,20,23 4:26 5:1,4 6:1,4,6,13 6:24 7:18 8:18,23,25 9:4,10,21 10:6,8,26 12:19 13:15 14:1 15:16 16:4,5 17:22 18:19 19:24 21:16 22:1,19 23:8,14 25:4 25:8,13 26:5 27:17 27:22,27 28:8,12,18 29:14 31:8 32:1 33:1 34:20,24 35:8,12,16 35:22 36:24 37:24 38:20 39:13 40:18 41:2,22 42:18 43:7 43:17,20 44:1,21 46:8,14 47:9,15,18 48:9,18,21 49:13,21 50:15,22 51:26 52:8 53:10,20 54:14,16 54:18,21,25,26,27 HOPE 15:18 21:24 24:23 30:5 31:13 36:20 38:19 HOPEFULLY 17:20 23:4 34:25 46:27 HOPING 20:8 HORIZON 31:24 HUNDRED 47:14,17
<hr/> G <hr/>	GOTTEN 5:22 GOVERNMENT 23:11 GRACIOUS 24:2 GRAND 2:9 GRANTED 6:15 7:28 8:10 26:11,13 GRANTING 26:6 GRANTS 7:21 GRAVE 24:4 GREAT 25:20 GREEDY 25:11 GREETINGS 4:18 5:7 GROUND 42:27,27 50:23 GROUNDWATER 9:17 10:20 11:12 13:2 14:17 15:10 28:5 47:11,12 49:11 49:12 50:12,14 GROUNDWATER... 11:18 12:12 GROUP 32:16 33:2 36:10 37:17 GROUPS 24:8 45:12 GUESS 11:23 17:2,15 25:11 54:10 GUIDANCE 25:1 50:28 GUYS 31:27	HAGGLES 31:25 HAGGLING 31:15 31:19,23,28 HALF 17:18,20 34:8 HALF-DAY 34:7 HAMMER 37:14 HANDWRITTEN 23:6 HAPPEN 37:11 38:7 44:4,5,5 53:9 HAPPENING 43:25 HAPPENS 19:14 36:3 HAPPILY 13:18 HAPPY 10:26 11:3 13:26 14:5 20:6 27:3 28:13 52:12 HARD 36:11,19 37:11 37:19 43:23 45:17 45:21,27,27 HEADING 42:20 HEADS 51:12 HEALTH 40:3 HEAR 47:1 HEARD 35:24 41:1 41:11 54:22 HEARING 9:22 24:27 35:1 54:23 HEARINGS 23:16,17 HELD 19:27 28:2,16 28:16 HELP 32:6 53:14 54:12	
	<hr/> H <hr/>		
GIVE 5:9,10 9:13 10:15 11:13 22:20 24:16 25:28 28:27 31:10 32:6 34:13 48:21 54:20 GIVEN 14:16 21:18 22:5 23:7 24:12 34:9 38:13 47:6,28 52:8 53:25 GIVES 28:6 GO 13:6 24:11 31:27 37:26 47:22 49:3 GOAL 44:5 GOD 17:15 GOING 9:7 13:24,25 14:1,4 16:15 21:19 23:18 26:16 27:20 30:11 31:3 32:19 33:16 34:12,15 35:18 38:5,21 39:17 40:27 41:13,16,22 41:23 42:2,3 44:18 44:19 47:3 48:22 49:6,14 52:21 53:4 53:22 GOINGS 34:15 GOLDEN 3:5 5:5 39:14 GOOD 4:23,26 5:1,4 16:5 19:4 26:4 27:26	HAGERTY 2:3 4:20 4:20 5:28 6:1,4,20 6:24 8:3,7,17,18,23 8:28 9:4,10,21 10:25 10:26 11:28 13:7,8 13:15 15:9,16,21,27 16:2 17:22 18:2 20:5 20:22,23 21:15,16 22:1,15,19 23:1,8,14 23:21,26 24:15,18 24:28 25:4,8,13,20		

47:28	INDIRECTLY 39:28	53:14	KNOWN 50:14
HUSBAND 25:6	INDIVIDUALS 12:27	ITEMS 9:5	KNOWS 13:21 17:15
HYATT 2:19 4:27	19:26		KOMAR 35:12,19
HYDROLOGY 29:1	INFER 40:1	J	KRASNER 3:5 5:4,5
33:4	INFERENCE 17:9	J 2:20	37:26 54:17,18
HYPER-TECHNIC...	INFORMATION	JACK 35:19	KRASNER'S 39:14
20:27	22:3,25 24:3,9 45:25	JANET 2:12	KRIEGER 2:3,8 47:3
HYPOTHETICAL	INHERITED 26:21	JENNIFER 1:23 6:8	KRONICK 1:23
14:10	INITIAL 24:25	JOE 2:12	L
HYPOTHETICAL...	INITIALLY 15:18	JOIN 14:17 35:4	LABELS 20:16
16:18	INQUIRIES 21:17	JOINING 5:14	LABOR-SAVING
I	INSOFAR 30:2	JOINT 5:16,20	48:28
IDEA 31:20,21,22,25	INTAKE 9:18 14:22	JOINTLY 29:19	LACKS 44:23
45:13 48:27 52:9	21:18	JOSTLE 38:16	LAKE 43:2,6,8,14
IDEALLY 11:27	INTENDED 11:11	JTB@BKSLAWFL...	LAND 14:8
IDENTICAL 5:26	13:21 14:14 40:2	1:26	LANDOWNER 10:19
9:15	INTERACT 30:3	JUDGE 1:4 30:14	LANDOWNERS 40:3
IDENTIFIED 33:12	INTERACTION 5:18	35:12 55:4	LARGE 14:24 28:5
IMAGINE 18:25	INTEREST 13:25	JUDGMENT 46:10	39:15
53:21	16:21 19:20 26:16	46:13,19,19,24,27	LARGEST 43:3
IMMEDIATELY	38:14 45:18 46:23	48:1,25 49:1,18,23	LATE 41:17
15:6 26:19 27:18	53:6	51:9	LATEST 33:27
IMPACT 39:26	INTERESTED 5:19	JUNE 27:28 28:7,16	LAW 2:13 31:6
IMPLEMENTING	9:17 10:11 11:18,19	31:7 34:14	LAWSUIT 39:16 40:2
36:17,27	12:13 15:10 23:12	JUNIOR 32:17,18	LAWYER 17:16
IMPORTANT 6:26	23:19 24:8 28:5	JURISDICTION 17:5	35:20
14:21 18:20 44:12	47:10 48:1 49:11	17:7,11 18:5,15,28	LEAD 35:6
IMPOSSIBLE 38:26	52:11	47:23 52:17,22 54:9	LEADS 16:25
IMPRACTICAL	INTERESTS 36:14	JURISDICTIONAL	LEARNING 50:22
38:26	36:15	17:19	LEAVE 28:20 29:24
INCLUDE 15:23	INTERIM 14:2 35:27	JURY 34:26	LEFT 11:27 39:3
21:12 26:27	44:7 47:2	JUSTICE 3:4,10	LEGAL 14:16 17:10
INCLUDED 9:23	INTERVENE 11:24	K	19:3
16:4,8	INVESTIGATING	KEEP 25:11 31:19	LEGALLY 8:5
INCLUDING 19:28	12:15	KEEPING 51:3,18	LEGITIMATE 29:10
39:21	INVOLVED 37:14	KEY 29:8	LET'S 34:19
INCONSISTENCIES	IRATE 39:22 40:3	KILLING 41:19	LEVEL 47:22 49:7
19:27	ISSUANCE 40:1	KIND 15:14 17:7	51:4,10,11,16,17
INCONSISTENT	ISSUE 11:22 13:23	54:19	LEVELS 42:15
12:23	19:3 23:15 24:4,5,21	KNEE 31:14	LEWAND-MARTIN
INCORPORATED	24:28 25:14,16	KNOW 11:23 16:3	1:18
9:8	26:28 27:3,18,23	19:23 22:19,28 26:1	LIE 33:9
INCORRECT 21:4	36:18 44:12 45:19	26:2 30:21 33:9,16	LIEU 7:23,26,27 8:8
INDICATE 7:21	52:7	36:8 38:7 41:12	25:2
INDICATED 13:16	ISSUES 13:27 18:9	43:26 48:11 51:18	LIFE 33:7
43:26	29:8 32:4 36:1,2	51:19 54:6	LIFTED 42:24
	45:15,19 46:14,25		

LIGHT 22:17	LYON 36:13	40:5,10,14,17,24,26	MULTIPLE 5:9 7:7
LIKES 40:16		41:6 42:8 43:21	16:13 18:22,24 29:5
LIMITED 11:12	M	44:14 45:22 46:20	34:9 51:21
14:23,23,25 20:15	M 2:8	52:8 53:18,20 54:4	MUNICIPAL 2:23
21:19 22:14 26:20	MA'AM 6:12	54:17	4:25 32:20
43:19 47:11	MAD 40:12	MELNICK'S 42:1	MUTUAL 39:21
LINE 16:3 26:3	MAGICALLY 21:24	MEMBER 10:11	MYSTERY 17:20
LINES 12:4	30:23	MEMBERS 23:19	37:6 45:25
LINK 28:21	MAIL 27:11 51:25	MEMORY 44:22	N
LIST 11:11 19:1	53:5	MENTION 49:8	N 3:11
22:16 53:22,28,28	MAILED 28:5	MENTIONED 52:9	NAME 4:2 5:9,10 6:7
54:1	MAILING 15:13	MERELY 10:18,22	10:15 12:1 14:9 17:1
LISTED 11:15 20:2	50:26,27	MESA 2:27	50:13
LISTS 17:5	MAIN 42:24 52:24	MESH 37:19	NAMED 9:14,17 11:6
LITERALLY 18:26	MAKING 10:14	MESSAGE 30:3	11:14,19 14:11,15
LITIGANTS 9:19	35:21 36:28 38:3	52:24	15:1,11 21:21,28
LITIGATE 16:21,24	44:11	METHODICAL 47:4	22:5,6,23 24:13 46:6
LITIGATION 30:23	MAN 18:26	METRO 28:21	46:11 47:5 50:3,11
42:6	MANAGEMENT	METROPOLITAN	50:13,18,19
LITTLE 7:5 12:15,23	28:6	45:6	NAMES 5:14 11:7
22:26 37:22 39:26	MANIFEST 7:16 8:26	MICHAEL 2:12,12	20:1 21:26 22:8,14
45:4	MANUALLY 21:27	MICHELIN 30:26	NATURAL 39:3
LIVE 46:23	MARC 3:11 5:2 37:27	MIND 53:19	NECESSARILY
LLC 19:10,12	MARC.MELNICK...	MINE 31:20	26:24 30:11 40:12
LLP 2:3,8,25	3:13	MINIMAL 43:2	NECESSARY 20:7
LOCATED 38:24	MARCH 8:21 30:1,6	MINOR 9:5	NECESSITY 22:7
LOCATION 42:24	31:10,14,16,17	MINUTE 5:15 7:20	NEED 5:12 6:19 8:16
LOCUS 28:23	33:22,22 55:22	16:16	9:13 11:2 12:5,28
LODGED 24:12	MARKING 24:14	MINUTIA 51:13	34:10 37:2 40:18
LOGICAL 31:9	MATCHES 11:13	MODE 48:12	41:28 48:14 51:4,9
LONDON 30:5	27:15	MODES 30:9	51:12 52:21
LONG 11:6 27:28	MATERIAL 6:25	MOMENT 8:4 19:23	NEEDS 39:2 51:5
41:27 47:25	MATTER 16:19	28:1 30:8 34:5 37:10	NEGATIVELY 35:20
LONG-STANDING	55:19	52:11	NEGOTIATING
43:8	MATTERS 26:15	MONEY 25:12 35:19	35:21 39:11 42:2
LOOK 41:13 46:20	MEAN 30:11 35:19	MONTHS 7:3 24:24	NEGOTIATION 33:5
48:18	36:14	35:15 42:23	37:22
LOS 1:2 2:10,21 3:6	MEANINGFUL	MORNING 29:2 34:4	NEITHER 16:20
4:5 45:7 55:2,15,23	38:16 42:26	MORTGAGE 26:17	NEUTRAL 35:10
LOST 6:16	MEANS 26:20 53:26	MORTGAGED 26:21	NEVER 26:12
LOT 14:4 17:22 19:27	MEDIATION 35:13	MOTION 7:23 11:24	NEW 8:21 11:5 14:20
24:5 33:8,15 37:13	MEETING 31:2	41:23	35:9 43:20 45:25
40:7 44:14,16 45:15	MEETINGS 23:12,18	MOVE 16:15 31:18	50:23
50:22 52:12	23:22 24:1,6,7 40:6	33:19 41:28 46:2	NEWER 32:23
LOTS 12:21	MELNICK 3:11 5:1,2	MOVES 13:28	NEWLY 46:6
LOVE 48:27	37:24,27,27,28 38:2	MOVING 23:9 38:28	NEWLY-APPEARI...
LOW 39:5	38:19,27 39:4,7,23	42:20	

20:21 21:3 NEWS 19:4 NIGHTMARE 27:21 NITPICKS 9:12 NO-GO 33:18,19 NOAH 3:5 5:5 NOAH.GOLDENK... 3:7 NON-RESPONSIVE 51:23 NONPROFIT 21:7 NONSTARTER 42:3 NORMALLY 48:11 NORTH 2:15 30:26 NOTED 4:7 41:16 NOTICE 11:17 12:22 14:28 15:12,19,21 16:8 18:3,4 19:28 20:1,2 27:6 28:4,6 28:17,24 40:1 42:18 47:13,20,25,28 48:4 49:12,22,25 50:27 51:6,19 53:3,23,25 53:26 54:20 NOTICED 20:13 22:21 28:19 NOTICES 45:24 49:11,16 51:23 NOTICING 13:11 18:6,12,16 NOTWITHSTAND... 35:18 NUMBER 4:1 12:20 18:21 19:25,28 21:9 23:5 28:5 51:22,23 52:19	OBTAINS 43:13 OBVIOUS 26:10 OBVIOUSLY 13:28 36:14 39:24 48:24 OCCASION 5:8 23:12 OCCASIONS 52:20 OCCURRED 7:8 13:17 22:7 24:6 OFFENSE 8:1 OFFER 14:7 18:9 33:23 OFFICE 3:4,10 5:2 9:18 21:5 27:12 OFFICIAL 1:28 28:9 55:13 OJAI 1:22 2:16 5:23 5:25 6:4,5,9,21 7:5 7:14,22,24 8:10,21 23:22 39:24 52:10 OJAI'S 7:11 OKAY 6:14 7:20 9:2 21:19 22:4 23:9 27:24 29:28 32:27 37:23,28 40:28 42:22 52:23 54:10 54:11 OLD-SCHOOL 35:20 OOO--- 4:11 OPEN 13:17 29:10,25 30:21 44:13 45:28 OPENING 44:10 OPERATIVE 14:15 30:10 OPPORTUNITY 33:25 OPTION 31:23 OPTIONS 27:9 ORDER 5:15 7:20,22 7:24,24,26,28 8:9,13 9:8,23 10:3 24:12 25:5,15,19,21 26:6 26:28 35:2 37:22 42:8 ORDERING 41:25 ORIGINAL 38:11 50:16	ORIGINALLY 31:21 33:11 ORIGINATING 21:6 OSIAS 6:16,16 10:6,8 10:8,10,13,18,27 11:5,8 12:2,3,14 OUGHT 34:17 54:3 OUTRIGHT 19:5 OVERLIERS 18:13 OVERLYING 10:20 13:12 OWNED 16:18 19:8 39:21 OWNER 11:27 19:2 OWNERS 9:15,17 28:6 51:21 53:28 OWNING 16:13 18:26 OWNS 19:5,6,9	17:26 18:4,14 PARTICIPATION 14:21 PARTIES 5:19 6:11 9:16 14:1,20,25 21:13 22:21 23:12 24:8,25 27:1 29:4,14 29:24 30:21 32:1 33:12 34:9 35:3,4 42:19 44:17 45:17 46:1,11,16 47:14,17 47:19,23,24 48:1 49:11 53:13 PARTY 10:9 11:14,19 11:20 12:13 14:11 14:12 15:11 16:22 18:3 20:15,18,21 21:3 22:8,23 35:26 PASSING 17:20 PATH 29:21,26 PAUL 2:14 PAY 25:22 PAYING 25:24 51:9 PENDENCY 14:28 40:2 PENDING 27:27 45:20 PEOPLE 5:9 7:8 11:12 13:11,11,17 16:9,12 20:1 22:12 24:5 27:7,10 28:11 31:24 32:3 39:15,27 40:3,7,15 46:26,28 49:10 53:4,15,23 PERCEIVE 34:15 40:9 PERCENT 38:9 47:14 47:16,16,17,17,28 48:7,8 52:2 PERCENTAGE 30:22 51:28 PERCEPTION 51:27 PERFECT 13:11 PERIOD 34:5 PERS 25:22 PERSON 4:19 11:16 11:18
<hr/> O <hr/>		<hr/> P <hr/>	
O'REILLY 1:19 OAKLAND 3:12 OBJECT 10:4 46:28 OBJECTION 10:4 24:26 27:1 34:28 OBJECTIONS 47:1 OBSERVATION 20:18 OBSERVE 37:16		P.C 1:23 P.M 4:9 28:7 35:1 54:28 PACKET 16:9 PAGE 8:13,28 11:6 PAGES 55:17 PAIN 52:16 PAPER 15:7 PAPERWORK 5:24 6:19 8:19 20:2 23:7 24:13 PARCEL 14:27 16:22 17:14 19:6 23:5 51:21 PARCEL-BY-PAR... 49:27 PARCELS 16:14,18 16:24,28 17:6,10,17 19:16 25:10 PARK 2:20 PART 14:21 15:23 43:3 46:14 50:5,6 PARTE 6:20,21 7:21 7:24,28,28 8:9,20 PARTES 6:14 9:2 PARTICIPATE	

PERSONS 47:10 50:3	POSSESS 54:8	14:21	PUBLICLY-MAIN...
PERSPECTIVE	POSSIBLE 12:26	PROCEDURES 48:5	20:9
18:12,16 31:9 33:17	13:5 20:10 53:2,17	PROCEEDINGS 1:13	PUMPING 38:25
41:18 42:21	POSSIBLY 38:21	54:28 55:16,19	42:14
PERSPECTIVES	POST 9:26 51:22	PROCESS 9:18 15:10	PURCHASE 43:7,16
32:4	POSTED 9:27 54:6	18:6 22:22 23:3	PURE 15:10
PETITION 20:28	POSTING 9:13,28	41:12 46:28 47:22	PURPOSES 10:23
21:7	47:21,28 48:7 52:9	48:15 51:20 53:8	14:19 17:19 18:7
PETITIONS 21:10	POTENTIAL 14:24	PROCESSED 26:11	PURSUANT 49:23
PHONE 4:15 5:7,10	15:11 20:16 22:17	PRODUCTIVE 33:20	PURSUIITS 33:20
5:14 6:2 41:1	47:12	PROGRESS 20:13	PUSH 34:5
PHRASE 15:5	POTENTIALLY	28:28 35:21 37:1	PUT 9:12 27:3 31:25
PHYSICAL 36:27	11:19	42:5	32:24 42:7,17 43:10
37:15 45:18	POVERTY 26:19,25	PROJECT 44:24,26	43:28
PICKING 44:2	POWER 31:19 40:24	44:28 45:2,10,12,13	PUTTING 13:22 17:9
PISANO 2:8 4:22	PRACTICAL 33:25	PROMISED 41:7	19:2
PLACE 32:24 38:24	PRACTICE 41:23	PROOF 8:20 48:12,15	
PLAINTIFF 1:6,17	PRECISELY 20:28	49:26 51:4	Q
20:16 38:11 50:26	PREEMPT 35:23	PROOFS 34:19	QUESTION 10:18
55:6	PREFER 8:3 24:16	PROPER 49:6	12:2,21 17:21 18:18
PLANS 30:10	34:10	PROPERLY 18:6	18:23 19:14,23
PLANT 38:24	PREFERENCE 6:26	PROPERLY-CAPT...	23:15 26:2 29:10
PLANTS 38:23,23	7:10 24:20 33:28	9:24	33:10 35:9,17 38:27
PLAUSIBLE 38:17	PRESENCE 40:23	PROPERTIES 12:22	42:7,22 43:18
PLEADING 15:4,14	PRESENTATION	14:2 18:23,27 19:1,2	QUESTIONS 17:24
17:2 21:6	28:28 33:4	19:3,25 52:9	52:24 53:13,14
PLEADINGS 21:12	PRESENTATIONS	PROPERTY 19:7,8	QUICK 33:18
21:28	29:5 32:15	25:7 26:21 53:28	QUICKLY 9:6
PLEASE 5:8 9:6	PRESENTED 46:4	PROPOSAL 9:22	QUITE 19:15 26:21
17:28	PRESENTS 20:10	12:4 41:8	38:4 41:6,7,8
PLEASURE 23:26	PRESERVED 13:26	PROPOSE 29:24	
PLENARY 17:11	PRESERVES 13:21	PROPOSED 7:1 9:8	R
POINT 23:10 31:19	PRESUMABLY	9:23 24:12 38:4	RANCH 2:18
32:2 33:1,24 36:7	12:10	PROVE 12:7 47:13	RANGE 40:14
40:17	PRETTY 16:11 17:23	49:15,16,21,23	RE-MAIL 52:5
POINTED 47:20	18:13 32:14 33:3,9	PROVEN 48:7	REACH 41:19
POLITICAL 37:16	33:18 42:20	PROVIDE 22:2 29:21	READILY 9:19
39:20,26	PRO 1:28 25:22 26:7	36:26 48:19	READY 37:3
POOR 30:20	55:14	PROVIDED 22:24	REAL 18:23 26:17
POPULATE 21:25	PROBABLY 5:10	24:9 25:1 28:26	REALISTIC 31:12
POPULATION 39:15	11:23 14:23 16:26	45:24 47:26 49:22	REALLY 36:13,18
PORTION 29:3,5	23:27 25:10 32:14	51:6	37:5 41:12,28
44:23	45:4	PROVING 53:27	REASON 17:15 22:11
POSITION 38:17	PROBLEM 12:17	PUBLIC 10:12 23:12	28:15 46:15 50:17
43:26 51:15	39:1	23:15,16,17,19,21	REASONABLE 9:12
POSITIONS 33:3	PROBLEMS 30:2	30:9 38:14 53:4 54:2	38:18 42:15
43:24	PROCEDURALLY	PUBLICLY 39:21	REBOOK 33:21

RECALL 47:20	RELIEF 6:21 7:16	RESPONSE 13:9 35:5	5:17 30:28 31:1
RECALLS 35:27	RELIES 41:14	RESPONSES 7:4	SANTA 1:5 4:2,12,14
RECEDING 31:24	REM 53:25 54:8	RESPONSIVE 15:4	21:7 55:5
RECEIPT 48:7 49:4	REMAIN 29:8	21:28	SATISFACTION
52:1	REMEMBER 35:9	RESULT 16:13	47:13
RECEIPTS 48:14,17	REMIND 15:9 49:10	RETURN 48:6,14,16	SATISFIED 38:11
50:1	50:13	49:4 50:1 52:1	SAYING 12:6 35:24
RECEIVE 11:16	REMINDED 52:19	RETURNED 51:19	SAYS 47:26 49:28
16:10 26:8	RENAME 8:6	REUNION 31:6	50:21,25
RECEIVED 16:12	RENDITION 48:23	REVIEW 15:22	SCABS 44:2
20:1,14 27:16 47:19	REPORT 5:16 29:20	REVIEWED 5:16	SCHEDULE 42:13
49:24 51:18	31:10 34:11 35:2	REVISED 24:19	SCHEDULED 30:15
RECEIVES 17:27	55:16	RIGHT 10:16 11:8	SCHOOL 31:6
18:3	REPORTED 36:11	12:7,14 14:16 17:25	SCHRECK 2:19 4:27
RECESS 54:23,24	REPORTER 1:28 4:8	19:18,21 28:13	SCIENCE 27:26
RECOGNITION	55:13	35:26 36:10 38:2	28:12,25 29:12
28:10	REPORTER'S 1:13	39:4 40:14,17 45:22	30:20 31:13 32:13
RECOGNIZED 36:5	REPORTS 35:5	52:8 54:4	33:18
RECOGNIZES 25:27	REPRESENT 19:19	RIGHTS 10:19 11:12	SCREAMS 11:26
RECOLLECT 26:14	REPRESENTED	11:17,22 12:12 13:1	SEASON 41:17,26
RECORD 5:13 10:5	23:28	13:21 16:24 17:10	SEASONS 39:5
22:9 28:2,3 32:20	REPRESENTING	19:3,19 38:14 43:12	SECOND 19:11 28:15
RECORDS 20:9	11:10	RIPARIAN 9:14 10:1	48:21
52:25 53:1,7 54:2	REPS 31:28	10:21 11:17,22,27	SEE 7:28 8:9 16:27
REDUCED 26:8	REQUEST 5:25,27	12:11 13:1,12 15:11	26:12 27:5 29:17,25
38:12	7:11,21 8:12 24:27	16:19,20,20 50:9,11	30:24 31:27 34:19
REDUNDANT 5:26	25:25 30:14	RIPARIANS 24:19	38:22 46:19
REFILL 38:25	REQUESTS 5:22 7:7	RISK 12:12 17:10	SEEING 26:14
REGARD 18:2 28:28	49:4	RIVER 38:25 41:15	SEEK 6:20
REGARDLESS 13:24	REQUIRE 48:21	41:19 42:25 43:2,19	SEEKING 42:13
47:24	REQUIRED 15:23	ROME 30:5,6	44:26
REGARDS 16:12	REQUIRES 51:10	ROOM 40:5	SEEN 20:20,24 37:9
REGIME 42:14,14	53:24	RUN 30:17 48:27 49:8	SEGREGATE 50:4
44:8	RESERVE 12:5	49:9	SENSE 5:18,20 18:13
REGRETTABLY	RESERVING 12:7	RUNNING 51:14	20:28
20:18,24	RESERVOIR 32:23	RUNS 11:20	SENT 28:23 51:23,25
RELATED 29:1	42:27,28	RUTAN 2:25 4:24	54:4
42:22 44:11	RESOLVE 6:23 11:2	RYAN 12:19 13:9	SENTENCE 12:6
RELATES 43:19	27:23 46:25		SENTIMENT 10:24
RELATIONSHIP	RESOLVED 9:3	S	SEPARATE 9:28
43:8	RESOLVING 42:6	S-CORPORATION	12:28 19:6,13
RELATIVE 34:14	RESOURCES 1:8 3:8	19:8	SEPARATELY 19:14
36:21	4:3,13 5:3 38:1 55:8	SACRAMENTO 1:25	SEPTEMBER 7:3,13
RELATIVELY 9:5	RESPOND 17:26	31:2	SERVE 15:20,21
28:22	39:22	SALINIZATION	24:24 25:27 27:19
RELEVANT 15:23	RESPONDENT 3:8	38:22	37:15
18:7	21:3	SAN 1:20 2:2,5,7 4:21	SERVED 9:17 12:22

12:27 13:13 14:26 16:9 17:27 19:26 27:3 28:21 50:1 SERVEXPRESS 25:17 26:7,28 27:4 27:19 SERVICE 7:8 8:20 15:9 49:6 SET 11:6 27:28 SETTING 14:9 SETTLE 30:20 35:11 36:1 SETTLEMENT 35:28 36:18 37:25 38:4 40:20 41:8,12 44:7,9 46:5,10 SETTLEMENTS 35:18 SETTLES 30:23 36:1 SEVEN 33:26 SEWER 38:23,24 SHANAHAN 1:23 SHARE 36:13 37:10 43:5 52:25 SHAWN 2:3 4:20 49:28 SHAWN.HAGERT... 2:6 SHED 22:17 SHORT 15:5 30:6 48:27 SHOW 5:18 23:6 52:25 SHOWED 15:28 SHOWN 7:27 22:6 44:6 SHOWS 15:1 16:23 SICILY 30:5 SIDE 22:27 36:12 37:3 44:16 SIGN 6:19,19 8:14 SIGNAL 2:15 SIGNATURE 7:27 8:8 SIGNED 7:22 SIGNIFICANCE 10:22	SIGNING 6:22 7:26 24:15 SIMPLE 11:21 12:3 17:24 18:13 SIMPLICITY 8:4 SIMPLY 7:15 21:3 SINGLE 14:26 16:25 18:22,26 19:18 51:21 SITTING 4:19 SITUATION 45:27 SIX 7:3 18:27 24:24 SLIDE 31:20 SLIGHT 6:24 SLOWLY 31:24 SMALL 33:15 SOJOURN 30:6 SOLD 45:6,7 SOLE 19:2 SOLUTION 36:27 37:15 39:18 45:18 SOLVE 39:1 45:28 SOMEBODY 5:21 14:14,26 26:20 SOON 32:9 36:21 41:21 42:20 44:9 SOONER 32:13 33:14 34:14 42:4 SOPHISTICATES 48:11 SORRY 10:6 28:18 SORT 13:8 22:27 23:23 51:11 SOUTH 2:9 3:5 SOUTHERN 26:17 SPEAK 5:8,9 10:7,25 12:18 SPECIAL 17:16 SPECIALLY 6:8 10:10 SPECIFIC 7:12 43:18 SPECIFICALLY 16:3 SPECIFICS 37:21 SPECIFIES 48:13 SPEND 5:12 29:16 39:11	SPENDING 35:19 SPOUSE 19:7,11 SPREADSHEET 21:21 SPRING 3:5 STAFF 20:17 22:7 30:24 47:3 51:12 53:7 STANDARD 25:22,24 STANDPOINT 32:13 38:28 START 30:16 39:10 41:21 STARTED 20:4 STATE 1:1,8 3:3,8,9 4:3,13 5:3 33:6,6 35:23 36:7,14,22 37:2,5,8,21,28 38:10 44:24 45:2,13 55:1,8 55:14 STATEMENT 49:28 STATEMENTS 28:27 STATION 28:21 STATUS 6:11 9:8 11:13 24:12 26:22 28:13 29:20 34:14 34:17,28 42:11 47:4 STATUTE 15:17,22 47:26 48:5,13 49:23 50:22 52:4,15 53:21 53:24 STATUTES 50:21 STCP01176 4:12 STIPS 25:10 STIPULATE 46:27 STOP 31:15 STORAGE 42:23,26 42:28 43:2,3,4,10,20 STRAIGHTFORW... 50:6,7 STREAMLINE 14:17 STREAMLINING 12:25 STREAMS 39:3 STREET 1:24 2:15 3:5,11	STRUGGLING 29:4 SUBJECT 9:12 46:18 SUBMISSION 20:26 SUBMIT 9:23 24:18 SUBMITS 17:3,4 18:28 SUBMITTED 6:27 7:2,24 SUBMITTING 17:6 17:11 SUBSTANTIALLY 29:3 SUBSTITUTING 14:1 SUBTERRANEAN 32:24 SUCCESS 46:1 52:3 SUCCESSFUL 51:28 SUED 40:16 45:11 SUFFICIENT 41:25 53:24,26 54:7 SUGGEST 29:13,19 34:11 SUING 40:11 SUITE 2:15,21,26 3:6 SUMMARY 15:12 48:23 49:27 51:1 SUMMER 36:4 41:17 43:25 SUMMON 15:14 SUMMONS 12:23 14:27 15:25,28 16:3 16:8,9 17:25 SUPERIOR 1:1 16:27 55:1,14 SUPPORT 7:11 51:13 SUPPORTS 32:22 SUPPOSED 49:3,27 SURE 11:2 12:25 13:4 25:15 41:24 43:28 44:19 51:7 52:22 SWING 35:10
<hr/> T <hr/>			
T 1:23			
TABLE 4:19 6:18 44:1 49:5			

TAKE 5:13 8:1 10:2 17:18 20:3 26:7 27:15 30:14 31:26 35:6,10 38:15 43:11 44:19 45:15 47:8 48:18 49:7,15,17,27	16:24 17:9 18:19 24:14 25:10 26:10 26:27 28:16 29:9,17 31:8 32:1,8,14 33:3 33:5,9,28 34:7,17,21 34:25 38:20,27 39:13 40:24 41:27 42:8,10 44:3 47:21 50:5,6 53:26	TRADITIONAL 21:12 TRAIN 28:21 TRANSCRIPT 1:13 55:18 TRANSFERRED 14:2 TRANSIT 28:22 TRANSPORTATI... 30:10 TREADING 50:23 TRIAL 30:14,15,19 30:22 34:26 TRICKLE 11:20 TRIED 29:22 TRUE 46:21 55:18 TRUST 19:15,20,27 26:18 TRUSTEE 19:15,22 TRUSTS 19:17 TRUTH 11:22 TRY 13:10 19:13 29:6 31:14 35:6 37:19 52:26 TRYING 17:16 20:12 29:17 33:16 34:20 37:14 39:1 48:24 49:8,9 52:13 TUCKED 18:20 TUCKER 2:25 4:24 TURNING 8:19 TURNS 12:14 TWO 5:22 9:19 14:10 16:18,28 17:6,17 18:27 19:22 29:15 TYING 45:13 TYPES 9:19 TYPICALLY 41:18 TYPOGRAPHICAL 23:5	UNCERTAIN 10:19 UNDERSTAND 21:18 41:10,10 43:24 44:15,17 46:19 53:10 UNDERSTANDING 19:17 22:24 UNILATERAL 5:18 35:5 UNIVERSE 11:5 14:23,24,25 20:15 22:20,28 UNOFFICIAL 28:10 UNOPPOSED 5:24 UNUSED 45:1,4 UPDATE 28:26,27 UPDATED 35:2 UPLOAD 22:7 UPLOADED 22:10 UPSET 45:23 UPSTREAM 38:25 URGE 33:21 USE 6:27 10:1,2 11:1 11:11,25 12:4 14:9 14:13,22,24 15:2,3 17:28 24:19 27:19 30:2 36:19,21 USER-FRIENDLY 9:14 USERS 32:17 33:2 35:25 36:10 37:18 38:3,15 42:1 47:11 47:12 50:12 USES 37:16 41:15
TAKEN 46:17 50:2 55:19 TAKES 9:25 TALK 10:27 13:9,18 32:6,7 34:1,10 36:3 36:26 39:8 40:22 43:27 46:20 TALKED 10:27 24:22 36:25 37:4,7 43:20 43:21,24 44:10,14 TALKING 32:7 35:26 38:5,6 41:21 42:4 TALKS 35:18 46:5 TARGET 34:16 TAYLOR 2:18 TECHNICAL 22:26 TECHNICALLY 46:24 TECHNIQUE 48:28 TEDIOUS 53:7 TELL 27:6 32:8 40:8 51:8 TEMPORE 1:28 55:14 TERM 36:21,21 TERMS 7:8 36:17,18 41:6 TESTIMONY 55:19 THANK 10:18 19:24 25:4 32:11 35:8 54:14,16,18,25,26,27 THEORY 49:14 THIN 26:22 THING 18:7 31:9,12 THINGS 20:13 30:25 31:18 34:6 37:2 38:20 45:14 51:3 53:8 THINK 5:12 6:25,25 6:28 7:5,11 11:26 13:18 15:22,28 16:4	THIRD 19:7 THOROUGHNESS 15:15 THOUGHT 23:18 31:25 THOUGHTS 32:10 THOUSANDS 49:4 49:20 53:8 THREE 5:22 6:14 9:2 20:18 23:21 29:15 35:15 40:6 THROWING 15:13 THUMB 22:2 THURSDAY 4:5 TICK 8:12 9:5 TIDIED-UP 24:16,18 TIDY 21:20 TIDYING 21:23 TIE 45:10 TIME 4:9 5:11,12 7:8 12:16 20:3 21:25 24:24 27:28 29:16 32:18 36:7 39:11 41:27 42:9 45:15 51:12 TIMING 44:15 TITLE 9:15 19:9 26:18 TODAY 4:21 8:10 9:22 12:16 22:2 24:15 TODAY'S 8:14 TOKEN 49:3 TOLD 27:8,11 TOPIC 46:3 TRACK 18:8 51:3,18 TRACKING 47:4 TRADED 29:5	TRUCKING 19:15,22 19:17 TRUTH 11:22 TRY 13:10 19:13 29:6 31:14 35:6 37:19 52:26 TRYING 17:16 20:12 29:17 33:16 34:20 37:14 39:1 48:24 49:8,9 52:13 TUCKED 18:20 TUCKER 2:25 4:24 TURNING 8:19 TURNS 12:14 TWO 5:22 9:19 14:10 16:18,28 17:6,17 18:27 19:22 29:15 TYING 45:13 TYPES 9:19 TYPICALLY 41:18 TYPOGRAPHICAL 23:5	VALUE 32:3 VARIOUS 37:16 VENTURA 5:23,27 6:3,20 7:23 8:2,9,12 11:16 14:8 16:8,27 23:23,28 28:17,22 32:24 35:3 39:25 40:10,13 42:23 43:5 44:23 53:27 VENTURA'S 7:15 VERBIAGE 15:5
		<hr/> U <hr/>	<hr/> V <hr/>

VERIFIED 54:1	WAY 13:3 17:23	2:18 4:28	1004 1:19
VERSION 24:16	25:12 30:4,7 42:28	WORD 14:24 17:28	1011 1:24
VERSUS 4:13 30:26	46:9 52:14 53:16	WORDS 37:25	11,300 50:1
VICINITY 23:13,20	WAYS 16:17 31:12	WORK 10:28 11:3	12 30:27
VIEW 33:24 35:26	WE'LL 8:14 12:4,6	12:9 13:10,18,26	12,000 49:13 53:22
41:21 42:4	25:5 36:2	14:6 18:9,11 20:6	12,500 49:17
VINEYARDS 19:9	WE'RE 8:24 12:15,25	29:7,14,23 30:11	12,700 49:15
VOID 49:1,18	13:17 14:1,5 18:11	34:2,10 36:13 37:2	12801 1:27 4:8 55:27
VOIDABLE 49:1,18	27:3 28:13 34:11	44:16 45:15,28 49:7	13,000 49:13
VOLUNTEER 11:4	36:20,28 37:3,5,8	53:16	1300 46:8,9,11
VOTERS 39:22,28	41:16,22,23 44:13	WORKABLE 37:15	14 30:16,27
52:12	45:27,28 49:22	WORKED 22:25	1400 2:26
VS 1:7 4:3 55:7	50:22 51:3,20 52:3,7	41:22 42:12	15 31:1
	52:11,13,16,18,21	WORKING 20:5 33:2	15-COURT 30:15
	53:14	36:11,19 37:5,8,10	15,000 51:14
W	WE'VE 7:1,2,13	37:19 44:6 45:17,21	1515 3:11
WAIT 24:16	22:25 23:21 25:16	45:27 51:20 52:7	15TH 2:4
WAITING 41:6,7	28:25,28 29:5,5 32:4	WORLD 13:11 36:22	16 31:16 33:23
WAIVER 25:25,26	33:3 36:4,11,24 37:7	WORRIED 40:3	16372,Signature
26:6,11,24	38:21 39:8,9,9 41:6	WORRY 40:20 49:17	55:25
WAIVERS 26:12,14	41:11 43:26 44:6,8,9	WORTH 29:17 33:13	1700 46:6
WALK-ON 14:14	44:14 51:23	WOULDN'T 23:27	1702 3:6
WALK-ONS 22:17,28	WEBSITE 9:26	28:23	18 30:28
WALKED 23:25,27	WEEDS 51:8	WRITTEN 13:4 47:7	1905 32:24
WANT 5:8 11:25	WEEK 31:16,16	WRONG 5:21 14:24	19STCP01176 1:7 4:1
12:25 13:6 14:12	33:22,22		55:7
22:20 25:10,19	WEEKS 29:15	X	
29:16 30:2 31:19	WELL-DEFINED		2
34:7,13 39:10,10	32:15	Y	2 8:21
40:19,25,26 42:17	WENT 6:18 40:6	YEAH 44:3	20 30:28
44:4 46:2 51:7 53:1	WEREN'T 20:2 40:12	YEAR 39:6	200 49:17,18
WANTED 7:17 13:15	WEST 2:4	YELLOWSTONE	2000 51:24 52:9
53:20	WHO'VE 11:5	31:4	2020 1:14 4:5 7:3,13
WANTS 17:14	WIFE 25:6 30:4	YESTERDAY 9:13	42:16,16 55:20,22
WASN'T 22:23 23:2,2	WILD 33:7	YOUNGER 50:24	2049 2:20
WASTEFUL 42:16	WILDLIFE 3:2 5:6		206 2:15
WATCH 20:12	WILLIAM 1:4 4:6	Z	20TH 3:12 5:17 30:2
WATER 1:8 2:23 3:8	16:17 17:1 18:26		30:16 31:10,14
4:3,13,25 5:3 11:20	55:4	0	21 30:6
32:17,21 36:19	WILLING 14:20		213.269.6343 3:7
37:28 38:16,25,28	33:23 43:26 46:16	1	213.617.8100 2:10
39:2,5,21,27 41:25	WISH 10:1 18:15	1 8:24 27:28 28:7	22 31:3
42:16,24 43:8,9,14	29:24 40:28 54:22	30:17 31:7 34:14,20	22ND 1:24
43:16 44:24 45:2,6	WISHES 12:18 28:14	35:3,5 55:17	25 25:2
45:13 55:8	WITHDRAWALS	1:30 28:7 35:1	25TH 2:9
WATERSHED 16:18	43:1	1:47 4:9	26 31:3
23:20 38:12 43:14	WOOD-CLAEYSS...	10 1:4 4:6 33:26 55:4	27 1:14 4:5 55:20
52:17			

28 18:27 19:1,2,3 25:9 25:10 31:5 29 31:6 <hr/> 3 <hr/> 3 55:22 3:02 54:28 300 2:9 3:5 3000 51:24 310.500.4600 2:22 3550 2:21 <hr/> 4 <hr/> 4 41:19 415.360.2962 1:20 435 25:2 465 25:2 <hr/> 5 <hr/> 510.879.0750 3:13 54 55:18 <hr/> 6 <hr/> 611 2:26 619.525.1300 2:5 655 2:4 <hr/> 7 <hr/> 70TH 31:4 714.641.3419 2:27 782 50:2 <hr/> 8 <hr/> 8 48:8 805.418.3110 2:16 83 52:2 84 50:3 8TH 7:3,13 30:6,17 34:22 35:1 <hr/> 9 <hr/> 9 30:13 33:22 90 38:9 90013 3:6 90067 2:21 90071 2:10 916.446.4254 1:25 92 48:7	92101 2:5 92626 2:27 93023 2:16 94 47:16 94129 1:20 94612 3:12 95816 1:25 96 47:16 99.2 47:17 9TH 31:17		
---	--	--	--