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5 Attorneys for Cross-Defendants Jurgen Gramckow  
 and Geraldine Gramckow, individually and as  
 6 Trustees of the J&G Trust; Martin Gramckow and  
 Linda Gramckow, individually; Martin Gramckow,  
 7 Trustee of the Monika G. Huss Irrevocable Trust,  
 Trustee of the Karin W. Gramckow Irrevocable  
 8 Trust, and Trustee of the Kurt J. Gramckow  
 Irrevocable Trust

9  
 10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
 11 **COUNTY OF LOS ANGELES, COMPLEX CIVIL DIVISION**  
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13 SANTA BARBARA CHANNELKEEPER,  
 14 A California non-profit corporation,

15 Petitioner,

16 v.

17 STATE WATER RESOURCES  
 CONTROL BOARD, a California State  
 18 Agency; CITY OF SAN  
 BUENAVENTURA, a California  
 19 municipal corporation,

20 Respondents.  
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 23  
 24 AND RELATED CROSS-ACTION.  
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 26  
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Case No. 19STCP01176

Assigned for all purposes to the Hon. William F.  
 Highberger, Dept. SS10

**INITIAL DISCLOSURES**  
**(CAL. CODE CIV. PROC., § 842)**

Action Filed: September 19, 2014

1 Pursuant to California Code of Civil Procedure (“C.C.P.”) section 842, cross-defendants  
2 Jurgen Gramckow and Geraldine Gramckow, individually and as Trustees of the J&G Trust;  
3 Martin Gramckow and Linda Gramckow, individually; Martin Gramckow, Trustee of the Monika  
4 G. Huss Irrevocable Trust, Trustee of the Karin W. Gramckow Irrevocable Trust, and Trustee of  
5 the Kurt J. Gramckow Irrevocable Trust (collectively, the “Gramckows”) submit their initial  
6 disclosures based on the information reasonably available to them. (C.C.P. § 842, subd. (c).)

7 The Gramckows assert their rights in this proceeding through the Rancho Matilija Mutual  
8 Water Company (the “Company”) and incorporate by reference the initial disclosures of the  
9 Company, attached hereto as Exhibit A.

10  
11 Date: June 1, 2021

FERGUSON CASE ORR PATERSON LLP

12  
13 By:  \_\_\_\_\_

14 Neal Maguire  
15 Attorneys for Cross-Defendants Jurgen  
16 Gramckow and Geraldine Gramckow,  
17 individually and as Trustees of the J&G  
18 Trust; Martin Gramckow and Linda  
19 Gramckow, individually; Martin  
20 Gramckow, Trustee of the Monika G. Huss  
21 Irrevocable Trust, Trustee of the Karin W.  
22 Gramckow Irrevocable Trust, and Trustee  
23 of the Kurt J. Gramckow Irrevocable Trust  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF VENTURA:

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action. My business address is 1050 South Kimball Road, Ventura, California 93004.

On June 1, 2021, I served  the original  a true copy of the foregoing documents described as *INITIAL DISCLOSURES* which is related to the action styled *Santa Barbara Channelkeeper v. State Water Resource etc. et al*, Los Angeles Superior Court, Complex Civil Division, Case No. 19STCP01176, as follows:

**BY MAIL:** I enclosed the above-described document in (an) envelope(s) with postage thereon fully pre-paid and addressed as set forth on the attached Service List. I am readily familiar with FERGUSON CASE ORR PATERSON LLP’s practice of collection and processing correspondence for mail with the U.S. Postal Service. Pursuant to that practice, I placed the above-described envelope into the Firm’s designated receptacle, of which the contents are to be deposited with the U.S. Postal Service on that same day at, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date stated herein.

**BY OVERNIGHT DELIVERY:** I enclosed the above-described document in (an) envelope(s) of a type designated by the express service carrier for overnight delivery with delivery fees fully pre-paid or provided for and addressed as set forth on the attached Service List. I  placed the above-described envelope into a box or other facility regularly maintained by the express service carrier/ delivered the above-described envelope to an authorized courier or driver authorized by the express service carrier to receive documents.

**BY ELECTRONIC TRANSMISSION: By transmission via E-Service to File & ServeXpress to the service list for this matter.**

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

(Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 1, 2021, at Ventura, California.

  
\_\_\_\_\_

Neal Maguire