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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES

11 SANTA BARBARA CHANNELKEEPER,  
12 a California non-profit corporation,

13 Petitioner,  
14

15 v.

16 STATE WATER RESOURCES  
CONTROL BOARD, a California State  
Agency;  
17 CITY OF SAN BUENAVENTURA, a  
California municipal corporation,  
18 incorrectly named as CITY OF  
BUENAVENTURA,

19 Respondents.  
20

21 CITY OF SAN BUENAVENTURA, a  
California municipal corporation,

22 Cross-Complainant  
23

24 v.

25 DUNCAN ABBOTT, an individual, et al.,  
26

27 Cross-Defendants.  
28

CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

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Case No. 19STCP01176

Judge: Honorable William F. Highberger

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JOINT BRIEF REGARDING IN REM AND  
IN PERSONAM JURISDICTION

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1 JOINT BRIEF REGARDING JURISDICTION

2  
3 Pursuant to Court order at the Status Conference on November 1, 2019, Defendant and  
4 Cross-Complainant City of San Buenaventura (“City”), Cross-Defendant Wood-Claeysens  
5 Foundation (“Foundation”), and Cross-Defendant Casitas Municipal Water District submit this  
6 Joint Brief (“Brief”) regarding in rem and in personam jurisdiction. As explained next, in rem  
7 actions often combine both forms of jurisdiction, the Streamlined Groundwater Adjudication  
8 Statutes expressly follow this approach, and comprehensive water rights adjudications have done  
9 the same.

10  
11 1. ACTIONS WITH IN REM JURISDICTION MAY BE COMBINED WITH IN  
12 PERSONAM JURISDICTION

13  
14 A. IN REM ACTIONS GENERALLY

15  
16 Other in rem actions contemplate naming and serving individual parties for in personam  
17 jurisdiction and publishing notice to all persons interested for in rem jurisdiction. For example,  
18 quiet title actions require plaintiff to name parties who have adverse claims to the property, and  
19 also allow plaintiff to name all unknown persons who claim an interest in the property. California  
20 Civil Procedure section 762.010 states: “The plaintiff shall name as defendants in the action the  
21 persons having adverse claims to the title of the plaintiff against which a determination is  
22 sought.” Section 762.060 (a) further provides that “the plaintiff may name as defendants ‘all  
23 persons unknown, claiming any legal or equitable right, title, estate, lien, or interest in the  
24 property described in the complaint adverse to plaintiff’s title. . . .”

25 Probate actions follow a similar process. A petitioner initiating proceedings for  
26 administration of a decedent’s estate must personally deliver notice of the hearing of the petition  
27 to: decedent’s heirs (Cal. Prob. Code § 8110(a)); each devisee, executor, and alternative executor  
28 named in any will (Cal. Prob. Code § 8110(b)); and any creditors of decedent. Cal. Prob. Code §

1 8112. In addition to personal service, petitioner must also publish notice of the hearing for in rem  
2 jurisdiction. Cal. Prob. Code § 8120. As the California Supreme Court explained, probate court  
3 heirship proceedings “settles ‘the rights of all persons claiming as heirs of the decedent, whether  
4 or not they are named in the complaint or personally served with summons.’” Estate of Radovich  
5 v. Citizens Nat’l Tr. and Sav. Bank of Los Angeles, 48 Cal.2d 116, 120 (1957) (citing Title &  
6 Document Restoration Co. v. Kerrigan, 150 Cal 289, 307 (1906)).

7 Actions to re-establish destroyed land records also combine publication with personal  
8 service. Cal. Civ. Proc. Code § 751.02 (applies to land records lost or destroyed). The summons  
9 is directed to “‘all persons claiming any interest in, or lien upon, the real property herein  
10 described, or any part thereof,’ as defendants. . . .” Cal. Civ. Proc. Code § 751.05. However, the  
11 summons also attaches a memorandum of known persons claiming “‘an interest in, or lien upon,  
12 said property to plaintiff,’ (giving their names and addresses as above provided).” Cal. Civ. Proc.  
13 Code §§ 751.07 (memorandum of claimants), 751.06 (summons attaches the memorandum). The  
14 summons and other documents are personally served on the “disclosed defendants.” Cal. Civ.  
15 Proc. Code § 751.10 (titled “service on disclosed defendants”).

16 In summary, naming and serving individual defendants or creditors while also publishing  
17 notice to all persons interested is a common feature of in rem actions.

#### 18 19 B. STREAMLINED GROUNDWATER ADJUDICATION STATUTES

20  
21 The Streamlined Groundwater Adjudication Statutes provide that individual pumpers who  
22 file answers will be defendants in the lawsuit. The notice to overlying landowners provides that  
23 “you may become a party to this lawsuit by filing an answer to the lawsuit on or before the  
24 deadline specified in this notice.” Cal. Civ. Proc. Code § 836(a). Section 836(k) seeks to ensure  
25 all claimants become parties by mandating that “it shall be the duty of all claimants interested in  
26 the proceedings and having notice of the proceedings pursuant to this chapter to appear in the  
27 proceedings. . . .” Jurisdiction over these individually appearing defendants is in personam.

28 At the same time, this process ensures that the court has in rem jurisdiction to adjudicate

1 all of the groundwater rights. Section 836(j) confirms that: “compliance with the service and  
2 notice provisions of this chapter shall be deemed effective service of process of the complaint and  
3 notice on all interested parties of the comprehensive adjudication for purposes of establishing in  
4 rem jurisdiction and the comprehensive effect of the comprehensive adjudication.”

5 Therefore, the combination of jurisdiction over individual named parties in personam and  
6 jurisdiction over all interested parties in rem is an express feature of the Streamlined Groundwater  
7 Adjudication Statutes.

8  
9 2. COMPREHENSIVE WATER RIGHTS ADJUDICATION LAWSUITS ARE  
10 STYLED IN THE NATURE OF QUIET TITLE PROCEEDINGS AND  
11 OPERATE QUASI-IN REM.

12  
13 Combined jurisdiction under the Streamlined Groundwater Adjudication Statutes  
14 recognizes that courts undertaking comprehensive water right adjudications exercise both in rem  
15 and in personam jurisdiction due to the unique nature of water rights. As explained by the United  
16 States Supreme Court “even though quiet title actions are in personam actions, water  
17 adjudications are more in the nature of in rem proceedings.” Nevada v. United States, 463 U.S.  
18 110, 143-44 (1983).

19 Courts have long recognized that water rights adjudications should be treated as “in rem”  
20 as they quiet title to realty and are in rem or quasi in rem. See e.g., United States v. Walker River  
21 LEXIS 57710 at pp. 29-31 (D. Nev. 2012); citing Sain v. Mont. Power Co., 20 F.Supp. 843, 846  
22 (D. Mont. 1937). This reasoning stems from the fact that water rights are property. Rank v.  
23 United States, 142 F.Supp. 1, 73 (S.D. Cal. 1956) (“In California, the rights to the use of water  
24 are part and parcel of the land to which they are appurtenant”); rev'd in part on other grds., State  
25 of California v. Rank, 292 F.2d 340 (9th Cir. 1961); Crum v. Mt. Shasta Power Corp., 117  
26 Cal.App. 586, 603 (1931) (“The riparian owners have a right to have the stream flow past their  
27 land ... [it is] a right of property, a parcel of the land itself”). Accordingly, in an adjudication,  
28 there must first be a declaration of party rights, which proceeds in rem. Rank, 142 F.Supp. at

73.

Many courts will then issue a decree in personam “against those asserting rights contrary to the rights of the plaintiff” as a mechanism to enforce the rights decreed by stipulation. Id. (“[I]n the ordinary suit for injunction, it is incumbent upon the Court to first determine the rights of the parties....The injunction operates in personam, but there is always first the adjudication that a party has a right”).

Several California courts have followed this pathway in issuing physical solutions resolving the water rights of the parties in a comprehensive adjudication, with a correlating injunction to enforce the decree under the court’s continuing jurisdiction. In Los Angeles County there are several examples. See e.g., City of Los Angeles v. City of San Fernando, 14 Cal.3d 199 (1975); City of Los Angeles v. City of San Fernando, et al., Los Angeles County Superior Court, Case No. 650079 (1979) (entitling the City of Los Angeles to an injunction against San Fernando subarea private parties); Hillside Memorial Park and Mortuary v. Golden State Water Company, 205 Cal.App.4th 534 (2011) (exercising continuing jurisdiction to amend 1961 judgment regarding the West Coast Basin and including in personam enforcement orders); Water Replenishment District of Southern California v. City of Cerritos, 202 Cal.App.4th 1063 (2012) (amending decree under continuing jurisdiction clause); Antelope Valley Groundwater Cases, Los Angeles County Superior Court, Santa Clara Case No. 1-05-CV-049053 (issuing an injunction against changing purpose of use and enjoining exports).

3. EXAMPLES OF COURTS EXERCISING COORDINATED MANAGEMENT OF GROUNDWATER AND SURFACE WATER RIGHTS

The amendments to the California Code of Civil Procedure enacted in the clean-up to the Sustainable Groundwater Management Act expressly included the coordination function in Section 833(c). These amendments codified the numerous cases that coordinated adjudications and management of surface and groundwater rights in a single action:

(a) Mojave River. See e.g., City of Barstow v. Mojave Water Agency, 23 Cal.4th

1 1224 (2000) (successive coordinated actions where basins or reaches had their individual rights  
2 determined inter se and then obligations between basins determined in the form of establishing  
3 boundary conditions or pass through flows).

4 (b) San Gabriel River. See e.g., Central Basin Municipal Water District v.  
5 Fossette, 235 Cal.App.2d 689 (1965), and Upper San Gabriel Valley Municipal Water District,  
6 Los Angeles County Superior Court, Case No. 924128 (1973, am. 1989) (both groundwater and  
7 surface water rights in the basin were adjudicated under five classes of water rights and the  
8 judgment placed injunctions against unauthorized production and non-consumptive uses).

9 (c) Santa Ana River. See e.g., San Bernardino v. Riverside, 186 Cal.7 (1921)  
10 (adjudicating surface and groundwater rights); Orange County Water District v. Riverside, 173  
11 Cal.App.2d 137 (1959) (adjudicating surface and groundwater rights lower reach vs. upper  
12 reach); Orange County Water District v. Riverside, 188 Cal.App.2d 566 (1961) (further orders);  
13 Chino v. Superior Court of Orange County, 255 Cal.App.2d 747 (1967) (further orders).

14 (d) Los Angeles River. See e.g., City of San Fernando, 14 Cal.3d 199; Los  
15 Angeles v. Glendale, 23 Cal.2d 68 (1943); City of Los Angeles v. City of San Fernando, et al.,  
16 Los Angeles County Superior Court, Case No. 650079 (1979) (adjudicating rights to surface  
17 water and four groundwater basins and enjoining unauthorized production).

#### 18 19 4. CONCLUSION

20  
21 As the above discussion explains, the combined in rem and in personam jurisdiction plead  
22 in City's Third Amended Cross-Complaint is expressly anticipated by the Streamlined  
23 Groundwater Adjudication Statutes and arises from well-established case law regarding  
24 comprehensive water rights adjudications. For these reasons, City believes its position is well  
25 founded.

1 Dated: November 15 2019

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Executed on November 15, 2019 at Walnut Creek, California.



Irene Islas


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