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Attorneys for Cross-Defendant
INTEGRITAS OJAI, LLC

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

SANTA BARBARA
CHANNELKEEPER, a California non-
profit corporation,

Plaintiff,

v.

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

Defendants.

CITY OF SAN BUENAVENTURA, a
California Municipal Corporation,

Cross-Complaint.

v.

DUNCAN ABBOTT, an individual, et al.

Cross-Defendants.

CASE NO. 19STCP01176

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

**VERIFIED INITIAL DISCLOSURES OF
INTEGRITAS OJAI, LLC**

Action Filed: September 9, 2014

VERIFIED INITIAL DISCLOSURES (CCP § 842)

- (1) The name, address, telephone number and email address of the party and, if applicable, the party's attorney.**

Name: Integritas Ojai, LLC;

Address: 208 Westminster Avenue, Venice, CA 90291;

Attorney Name: Andrew Brady;

Address: 550 S. Hope St., Suite 2400, Los Angeles, CA 90071;

Telephone Number: (213) 694-3108;

Email Address: andrew.brady@us.dlapiper.com.

- (2) The quantity of any groundwater extracted from the basin by the party and the method of measurement used by the party or the party's predecessor in interest for each of the previous 10 years preceding the filing of the complaint.**

The Property owned by Integritas Ojai, LLC at issue in this litigation is located at 2525 Gridley Road, Ojai, California. The Property contains two groundwater extraction wells. Precise records of extraction amounts have not been kept, but the wells are estimated to have produced between two and four acre feet per year for each of the last 10 years except 2018 and 2019. The well was not used in 2018 and 2019 due to damage to the Property caused by the Thomas Fire. The Property is not connected to a municipal water supply and is dependent on onsite wells for its water supply.

- (3) The type of water right or rights claimed by the party for the extraction of groundwater.**

Overlying and appropriative groundwater rights.

- (4) A general description of the purpose to which the groundwater has been put.**

Domestic, agricultural, and horse keeping.

- (5) The location of each well or other source through which groundwater has been extracted.**

1 The Property contains two groundwater extraction wells. One is located near the site of
2 the existing residential structure on the Property, and a second shared well is located near the
3 main entry gate to the Property off of Gridley Road.

4 **(6) The area in which the groundwater has been used.**

5 The groundwater extracted at the Property has exclusively been used on the Property for
6 domestic, agricultural and horse keeping purposes. In total, the Property is approximately 44
7 acres in size. Between 5-12 acres are used for domestic, irrigation, and horse-keeping purposes.

8 **(7) Any claims for increased or future use of groundwater.**

9 The volume of groundwater used on the Property for agricultural and horse keeping
10 purposes may be increased in coming years as the Property is further repaired following the
11 Thomas Fire and redeveloped.

12 **(8) The quantity of any beneficial use of any alternative water use that the party**
13 **claims as its use of groundwater under any applicable law, including, but not**
14 **limited to, Section 1005.1, 1005.2, or 1005.4 of the Water Code.**

15 Not applicable.

16 **(9) Identification of all surface water rights and contracts that the party claims**
17 **provides the basis for its water right claims in the comprehensive adjudication.**

18 Not applicable.

19 **(10) The quantity of any replenishment of water to the basin that augmented the**
20 **basin's native water supply, resulting from the intentional storage of imported or**
21 **non-native water in the basin, managed recharge of surface water, or return flows**
22 **resulting from the use of imported water or non-native water on lands overlying**
23 **the basin by the party, or the party's representative or agent, during each of the**
24 **10 calendar years immediately preceding the filing of the complaint.**

25 Not applicable.

26 **(11) The names, addresses, telephone numbers, and email addresses of all persons**
27 **possessing information that supports the party's disclosures.**

1 None, though Integritas Ojai, LLC hereby reserves the right to supplement this and the
2 other information provided in this disclosure.

3 **(12) Any other facts that tend to prove the party's claimed water right.**

4 None.

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6 Dated: June 1, 2021

DLA PIPER LLP (US)

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8 By _____
Andrew Brady

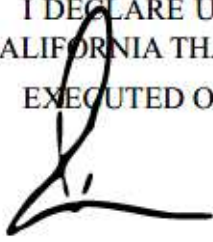
9 Attorneys for Cross-Defendant
10 INTEGRITAS OJAI, LLC
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VERIFICATION

I HAVE READ THE FOREGOING INITIAL DISCLOSURES OF CROSS-DEFENDANT INTEGRITAS OJAI, LLC AND KNOW ITS CONTENTS. I AM AN AUTHORIZED REPRESENTATIVE OF INTEGRITAS OJAI, LLC, A PARTY TO THIS ACTION, AND AM EMPOWERED TO MAKE THIS VERIFICATION ON ITS BEHALF, AND I MADE THIS VERIFICATION FOR THAT REASON. I AM INFORMED AND BELIEVE AND, ON THAT GROUND, ALLEGE THAT THE MATTERS STATED IN THE AFOREMENTIONED DOCUMENT ARE TRUE.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON JUNE 1, 2021 AT Ojai, California.



DAVID DE ROTHSCHILD

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2 **PROOF OF SERVICE**

3 I, Joy Ryan, declare:

4 I am a citizen of the United States and employed in Los Angeles County, California. I am
5 over the age of eighteen years and not a party to the within-entitled action. My business address
6 is DLA Piper LLP (US), 550 South Hope Street, Suite 2400, Los Angeles, California 90071-
7 2618. On June 2, 2021, I served a copy of the within document(s):

8 **VERIFIED INITIAL DISCLOSURES OF INTEGRITAS OJAI, LLC**
9

10 ☒ **(BY E-SERVICE):** I electronically served a copy of the foregoing document on the
11 interested parties in this action by submitting an electronic version of the document
12 via **File & ServeXpress** for distribution to the recipients on the Service List maintained
13 for this action by **File & ServeXpress**.

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

16 Executed on June 2, 2021, at Los Angeles, California.

17 

18 _____
19 Joy Ryan