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7 Attorneys for Cross-Defendant,
 ERNIE FORD
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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 10 COUNTY OF LOS ANGELES
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12 SANTA BARBARA CHANNELKEEPER,
 a California non-profit corporation,
 13
 Petitioner,
 14
 v.
 15 STATE WATER RESOURCES
 CONTROL BOARD, etc., et al.,
 16
 Respondents.
 17

Case No. 19STCP01176
 Judge: Honorable William F. Highberger
 VERIFIED INITIAL DISCLOSURES
 Action Filed: Sept. 19, 2014
 Trial Date: Not Set

18 CITY OF SAN BUENAVENTURA, etc.,
 19
 Cross-Complainant
 20
 v.
 21 DUNCAN ABBOTT, an individual, et al.
 22
 Cross-Defendants.
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1 INITIAL DISCLOSURES – CODE OF CIVIL PROCEDURE SECTION 842(a)

2
3 1. The name, address, telephone number, and email address of the party and, if
4 applicable, the party's attorney.

- 5 (a) Name: Ernie Ford.
6 (b) Address: 14845 Maricopa Highway, Ojai, California 93023.
7 (c) Phone Number: (805) 340-5004.
8 (d) Email Address: carlyinoj@aol.com.
9 (e) Attorney (if applicable): Patrick T. Loughman and Cristian R. Arrieta of
10 Lowthorp Richards McMillan Miller & Templeman.

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

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16 Year	Amount of Groundwater Extracted:	Method of Extraction:
17 2019	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
21 2018	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
24 2017	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
27 2016	75-acre feet estimate per Ventura River	Pumping

28

Year	Amount of Groundwater Extracted:	Method of Extraction:
	Groundwater Agency subject to modification due to lack of adequate records.	
2015	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2014	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2013	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2012	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2011	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping
2010	75-acre feet estimate per Ventura River Groundwater Agency subject to modification due to lack of adequate records.	Pumping

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

1 Rights attendant to fee ownership including groundwater and to the surface water flowing
2 throughout the property.

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4 4. A general description of the purpose to which the groundwater has been put.
5 Agricultural irrigation.

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7 5. The location of each well or other source through which groundwater has been
8 extracted.

9 Ventura County Assessor Parcel Numbers 010-0-050-010.

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11 6. The area in which the groundwater has been used.
12 Ventura County Assessor Parcel Numbers 010-0-050-010; 240; and 280.

13

14 7. Any claims for increased or future use of groundwater.
15 Unknown at this time.

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17 8. The quantity of any beneficial use of any alternative water use that the party
18 claims as its use of groundwater under any applicable law, including, but not limited to, Section
19 1005.1 , 1005.2 , or 1005.4 of the Water Code.

20 Unknown at this time.

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22 9. Identification of all surface water rights and contracts that the party claims
23 provides the basis for its water right claims in the comprehensive adjudication.

24 Riparian rights based on fee ownership. Water right identification number A017621.

25

26 10. The quantity of any replenishment of water to the basin that augmented the basin's
27 native water supply, resulting from the intentional storage of imported or non-native water in the
28 basin, managed recharge of surface water, or return flows resulting from the use of imported

1 water or non-native water on lands overlying the basin by the party, or the party's representative
2 or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Year	Quantity of replenishment of water
2019	Not applicable.
2018	Not applicable.
2017	Not applicable.
2016	Not applicable.
2015	Not applicable.
2014	Not applicable.
2013	Not applicable.
2012	Not applicable.
2011	Not applicable.
2010	Not applicable.

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

27 (a) Name: Ernie Ford.

28 (b) Address: 14845 Maricopa Highway, Ojai, California 93023.

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(c) Phone Number: (805) 340-5004.

(d) Email Address: carlyinoj@aol.com.

(a) Name: _____

(b) Address: _____

(c) Phone Number: _____

(d) Email Address: _____

(e) Name: _____

(f) Address: _____

(g) Phone Number: _____

(h) Email Address: _____

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

None at this time but Cross-Defendant reserves the right to amend or supplement this statement based on additional discovery and further research.

Dated: June 29, 2021



SIGNATURE

ERNIE FORD

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VERIFICATION

I have read the foregoing INITIAL DISCLOSURE and know its contents.

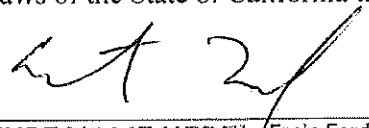
I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am _____ of _____, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

I am one of the attorneys of record for _____, a party to this action. Such party is absent from the county in which I have my office, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

Executed at [CITY] Ventura, California on June 29, 2021.

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



[TYPE NAME HERE] Ernie Ford

LOWTHORP RICHARDS
ATTORNEYS AT LAW
VENTURA COUNTY

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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 300 East Esplanade Drive, Suite 850, Oxnard, California 93036.

On July 1, 2021, I served the foregoing document(s) described as VERIFIED INITIAL DISCLOSURES on the interested parties in this action, by placing the original X a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

X (BY E-SERVICE VIA FILE & SERVE XPRESS): by causing a true copy thereof to be transmitted by E-Service via File & Serve Xpress to the person(s) set forth below.

____ (BY FIRST CLASS MAIL) ____ (BY EXPRESS MAIL) I caused such envelope with postage thereon fully prepared to be placed in the United States mail at Ventura, California. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

____ (BY PERSONAL SERVICE) I delivered such envelope by hand to the office of the addressee.

____ (EMAIL): by causing a true copy thereof to be emailed to the person or office, as indicated, at the email address(es) set forth above.

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

Executed on July 1, 2021, at Oxnard, California.



DARLENE ARIAS

SERVICE LIST

<p>1</p> <p>2</p> <p>3 Daniel Cooper Sycamore Law 1004 O'Reilly Ave. 4 San Francisco, CA 94129 5 daniel@sycamore.law</p> <p>6 Attorneys for Petitioner and Plaintiff Santa Barbara Channelkeeper</p> <p>7</p> <p>8</p>	<p>Matthew Bullock Deputy Attorney General California Department of Justice Natural Resources Law Section 455 Golden Gate Ave., Suite 11000 San Francisco, CA 94102-7004 matthew.bullock@doj.ca.gov</p> <p>Attorneys for Respondent and Defendant State Water Resources Control Board</p>
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<p>Julie A. Baker 2193 Maricopa Hwy. Ojai, CA 93023 jandjbaker2@gmail.com</p>	<p>The Joseph Fedele 1995 Living Trust, Oriana Marie Fedele, Trustee Attn: Oriana Fedele P.O. Box 298 Lahaina, HI 96767 orianafedele@gmail.com</p>

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