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12 Attorneys for Cross-Defendant, Betty Withers and Betty Bow Withers Trust
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES

15 SANTA BARBARA CHANNELKEEPER,
16 a California non-profit corporation,
17
18 Petitioner,
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20 v.
21 STATE WATER RESOURCES
22 CONTROL BOARD, etc., et al.,
23 Respondents.

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

24 CITY OF SAN BUENAVENTURA, etc.,
25
26 Cross-Complainant
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28 v.
DUNCAN ABBOTT, an individual, et al.
Cross-Defendants.

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: Betty Withers and Betty Bow Withers Trust

6 (b) Address: 128 W. Mission Street, Ventura CA 93001/APN 071-0-142-070

7 (c) Phone Number: (805) 272-5459

8 (d) Email Address: terry.wagner@live.com

9 (e) Attorney (if applicable): Cristian R. Arrieta

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

14

15 Year	Amount of Groundwater Extracted:	Method of Extraction:
16 2019	None	
17 2018	None	
18 2017	None	
19 2016	None	
20 2015	None	
21 2014	None	
22 2013	None	
23 2012	None	

Year	Amount of Groundwater Extracted:	Method of Extraction:
2011	None	
2010	None	

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

Not applicable.

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

Not applicable.

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

Not applicable.

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6. The area in which the groundwater has been used.

Not applicable.

7. Any claims for increased or future use of groundwater.

Not applicable.

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

Not applicable.

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

Not applicable.

1 10. The quantity of any replenishment of water to the basin that augmented the basin's
2 native water supply, resulting from the intentional storage of imported or non-native water in the
3 basin, managed recharge of surface water, or return flows resulting from the use of imported
4 water or non-native water on lands overlying the basin by the party, or the party's representative
5 or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Year	Quantity of replenishment of water
2019	None.
2018	None.
2017	None.
2016	None.
2015	None.
2014	None.
2013	None.
2012	None.
2011	None.
2010	None.

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

- (a) Name: Ventura Water
- (b) Address: 336 San Jon Road, Ventura, CA 93001
- (c) Phone Number: (805) 687-6500
- (d) Email Address: _____

- (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.

All water use is obtained through Ventura Water. Ground water extraction does not
apply to his party. Cross-Defendant reserves the right to amend/supplement this
disclosure based on further discovery and research.

Dated: June 30, _____, 2021

Betty Bow Withers
 [TYPE NAME HERE]
BETTY BOW WITHERS

SIGNATURE

Betty Withers/Betty Bow Withers Trust
 [CROSS DEFENDANT NAME]

1 VERIFICATION

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

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

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

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

14 Executed at [CITY] Ventura, California on June 30, 2021.

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

Betty Bow Withers
[TYPE NAME HERE]
BETTY BOW WITHERS

17 _____
18 [TYPE NAME HERE]

19 Betty Withers/Betty Bow Withers Trust
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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

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