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 Petrochem Development I, LLC  
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 10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 11 COUNTY OF LOS ANGELES

12 SANTA BARBARA CHANNELKEEPER, a  
 13 California non-profit corporation,  
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 15                                   Petitioner,  
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 17                                   vs.  
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 19 STATE WATER RESOURCES CONTROL  
 BOARD, a California State Agency; CITY OF  
 20 SAN BUENAVENTURA, a California  
 municipal corporation, incorrectly named as  
 CITY OF BUENAVENTURA,  
 Respondents.

Case No. 19STCP01176  
 Assigned for All Purposes to:  
 Hon. William F. Highberger, Dept. SS10  
  
**ANSWER OF CROSS-DEFENDANT  
 PETROCHEM DEVELOPMENT I, LLC  
 TO THIRD AMENDED  
 ADJUDICATION CROSS-COMPLAINT**

Action Filed: September 19, 2014  
 Trial Date: None Set


21 CITY OF SAN BUENAVENTURA, a  
 22 California municipal corporation,  
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 24                                   Cross-Complainant,  
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 26                                   vs.  
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 28 DUNCAN ABBOTT; AGR BREEDING,  
 INC., et al. ,  
 Cross-Defendants.

1 Pursuant to the Court's Order of November 27, 2019, Cross-Defendant Petrochem  
2 Development I, LLC ("Cross-Defendant"), denies all material allegations of the Third Amended  
3 Cross-Complaint in this action that seeks to adjudicate rights in the Ventura River Watershed,  
4 including its ground water basins which are the (1) Upper Ventura River Groundwater Basin  
5 (Department of Water Resources' ("DWR") Bulletin 118, Groundwater Basin Number 4-3.01); (2)  
6 Ojai Valley Groundwater (DWR's Bulletin 118, Groundwater Basin Number 4-2); (3) Lower  
7 Ventura River Groundwater Basin (DWR Bulletin 118, Groundwater Basin Number 4-3.02); and  
8 (4) Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118 Groundwater Basin Number 4-1)  
9 and asserts all applicable affirmative defenses thereto.

10 In addition to the foregoing, Cross-Defendant (1) no longer holds an ownership interest in  
11 real property located in the Ventura River Watershed, (2) does not have possession, as a lessee or  
12 otherwise, of any real property located in the Ventura River Watershed, and (3) does not claim or  
13 assert any water rights which to any degree concern the Ventura River Watershed.

14  
15 DATED: February 11, 2020

BROWNE GEORGE ROSS LLP  
Guy C. Nicholson  
Matthew L. Venezia

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18 By:   
19 Guy C. Nicholson  
20 Attorneys for Cross Defendant  
21 Petrochem Development I, LLC  
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1 VERIFICATION

2 STATE OF CALIFORNIA,

3 COUNTY OF VENTURA

4 I have read the foregoing Answer of Cross-Defendant Petrochem Development I, LLC to  
5 Third Amended Adjudication Cross-Complaint and know its contents.

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

9  I am an authorized representative of Cross-Defendant Petrochem Development I, LLC, a  
10 party to this action, and am empowered to make this verification for and on its behalf, and I make  
11 this verification for that reason.

12  I am informed and believe and on that ground allege that the matters stated in the  
13 foregoing document are true.

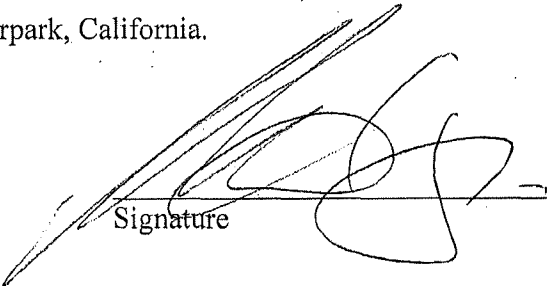
14  The matters stated in the foregoing document are true of my own knowledge except  
15 as to those matters which are stated on information and belief, and as to those  
16 matters I believe them to be true.

17  I am one of the attorneys for Petrochem Development I, LLC, a party to this action. Such  
18 party is absent from the county where such attorneys have their offices, and I make this  
19 verification for and on behalf of that party for that reason. I am informed and believe and on that  
20 ground allege that the matters stated in the foregoing document are true.

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

23 Executed on February 11, 2020, at Moorpark, California.

24 Michael Floryan

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26 Signature

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**PROOF OF SERVICE**

**Santa Barbara Channel Keeper, et al. v. State Water Resources Control Board, et al.  
Case No. 19STCP01176**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2800, Los Angeles, CA 90067.

On February 12, 2020, I served true copies of the following document(s) described as **ANSWER OF CROSS-DEFENDANT PETROCHEM DEVELOPMENT I, LLC TO THIRD AMENDED** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY ELECTRONIC SERVICE:** I electronically served the document(s) described above via File & ServeXpress, on the recipients designated on the Transaction Receipt located on the File & ServeXpress website (<https://secure.fileandservexpress.com>) pursuant to the Court Order establishing the case website and authorizing service of documents.

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

Executed on February 12, 2020, at Los Angeles, California.



Andrea A. Augustine

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**SERVICE LIST**

*Santa Barbara Channel Keeper, et al. v. State Water Resources Control Board, et al.*  
**Case No. 19STCP01176**

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