


<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name, State Bar number, and address</i>):                  —Thomas E. Jeffry (SBN 125265); Debra J. Albin-Riley (SBN 112602);                  Stefan Bogdanovich (SBN 324525)                  Arent Fox LLP - 555 West Fifth Avenue, 48<sup>th</sup> Floor                  Los Angeles, CA 90013-1065</p> <p>TELEPHONE NO: (213) 629-7400      FAX NO. (<i>Optional</i>): (213) 629-7401</p> <p>E-MAIL ADDRESS (<i>Optional</i>): thomas.jeffry@arentfox.com; stefan.bogdanovich@arentfox.com</p> <p>ATTORNEY FOR (<i>Name</i>): Cross-Defendant Community Memorial Health System</p>	<p>FOR COURT USE ONLY</p>
<p><b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b></p> <p>STREET ADDRESS: 312 North Spring Street</p> <p>MAILING ADDRESS:</p> <p>CITY AND ZIP CODE: Los Angeles, CA 90012</p> <p>BRANCH NAME: Spring Street Courthouse</p>	
<p>PLAINTIFF/PETITIONER: Santa Barbara Channelkeeper, et al.</p> <p>DEFENDANT/RESPONDENT: State Water Resources Control Board, et al.</p>	
<p><b>AMENDED GENERAL DENIAL</b></p>	<p>CASE NUMBER: 19STCP01176</p>
<p>If you want to file a general denial, you <b>MUST</b> use this form if the amount asked for in the complaint or the value of the property involved is \$1,000 or less.</p> <p>You <b>MAY</b> use this form for a general denial if:</p> <ol style="list-style-type: none"> <li>1. The complaint is not verified; <b>or</b></li> <li>2. The complaint is verified and the case is a limited civil case (the amount in controversy is \$25,000 or less), <b>BUT NOT</b> if the complaint involves a claim for more than \$1,000 that has been assigned to a third party for collection.</li> </ol> <p>(See Code of Civil Procedure sections 85–86, 90–100, 431.30, and 431.40.)</p>	

1. DEFENDANT (*name*): Community Memorial Health System, a California Corporation.  
generally denies each and every allegation of plaintiff's complaint.
2.  DEFENDANT states the following FACTS as separate affirmative defenses to plaintiff's complaint (*attach additional pages if necessary*):  
 Cross-Defendant Community Memorial Health System respectfully submits this amended general denial, pursuant to Code of Civil Procedure § 473. This amended general denial amends the previous general denial submitted on January 29, 2019, which incorrectly lists Cross-Defendant Community Memorial Health System as a California Medical Corporation, whereas in fact, it is a California Corporation.

Date: February 5, 2020

Stefan Bogdanovich \_\_\_\_\_  
(TYPE OR PRINT NAME)

▶   
(SIGNATURE OF DEFENDANT OR ATTORNEY)

If you have a claim for damages or other relief against the plaintiff, the law may require you to state your claim in a special pleading called a cross-complaint or you may lose your right to bring the claim. (See Code of Civil Procedure sections 426.10–426.40.)

The original of this *General Denial* must be filed with the clerk of this court with proof that a copy was served on each plaintiff's attorney and on each plaintiff not represented by an attorney. There are two main ways to serve this *General Denial*: by personal delivery or by mail. It may be served by anyone at least 18 years of age EXCEPT you or any other party to this legal action. Be sure that whoever serves the *General Denial* fills out and signs a proof of service. You may use the applicable Judicial Council form (such as form POS-020, POS-030, or POS-040) for the proof of service.

3 **PROOF OF SERVICE**

4 I am a citizen of the United States. My business address is Arent Fox LLP, 555 West Fifth  
5 Street, 48th Floor, Los Angeles, California 90013-1065. I am employed in the County of Los  
6 Angeles where this service occurs. I am over the age of 18 years, and not a party to the within  
7 cause.

8 On the date set forth below, according to ordinary business practice, I served the foregoing  
9 document(s) described as:

10 ***AMENDED GENERAL DENIAL***

11  (BY E-MAIL) On this date, I personally transmitted the foregoing document(s)  
12 via my electronic service address (polly.fung@arentfox.com) to the e-mail  
13 address(es) of the person(s) on the attached service list.

14  (BY MAIL) I am readily familiar with my employer's business practice for  
15 collection and processing of correspondence for mailing with the U.S. Postal  
16 Service, and that practice is that correspondence is deposited with the U.S. Postal  
17 Service the same day as the day of collection in the ordinary course of business.  
18 On this date, I placed the document(s) in envelopes addressed to the person(s) on  
19 the attached service list and sealed and placed the envelopes for collection and  
20 mailing following ordinary business practices.

21  (BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s)  
22 containing the document(s) to the persons(s) on the attached service list.

23  (BY OVERNIGHT DELIVERY) On this date, I placed the documents in  
24 envelope(s) addressed to the person(s) on the attached service list, and caused  
25 those envelopes to be delivered to an overnight delivery carrier, with delivery  
26 fees provided for, for next-business-day delivery to whom it is to be served.

27  (BY FEDERAL EXPRESS) I electronically served the foregoing document(s)  
28 through Federal Express on the person(s) on the attached service list.

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

Executed on February 10, 2020 at Los Angeles, California.



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Polly Fung

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*Santa Barbara Channelkeeper, et al. v. State Water Resources Control Board, et al.*  
*19STCP01176*

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