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7 Attorneys for Cross-Defendants MANFRED KRANKL AND ELAINE V. KRANKL,  
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9  
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **IN AND FOR THE COUNTY OF LOS ANGELES**

12 SANTA BARBARA CHANNELKEEPER, a  
13 California non-profit corporation,

14 Petitioner,

15 vs.

16 STATE WATER RESOURCES CONTROL  
17 BOARD, a California State Agency; CITY OF  
18 SAN BUENAVENTURA, a California  
municipal corporation, etc.,

19 Respondents.

20  
21 CITY OF SAN BUENAVENTURA, etc.,

22 Cross-Complainant,

23 vs.

24 DUNCAN ABBOTT, an individual, et al.

25 Cross-Defendants.  
26

27 ///  
28

Case No.: 19STCP01176  
Hon. William F. Highberger; Dept. SS10  
Complaint filed 9/19/14  
FAC filed 9/7/18  
Trial Date: Not Set

**INITIAL DISCLOSURES**



1                   **INITIAL DISCLOSURES - CODE OF CIVIL PROCEDURE §842(a)**

2                   The name, address, telephone number and email address of these parties, and if applicable  
3 the parties' attorney:

4                   1.       Name: Manfred Krankl and Elaine V. Krankl, Trustees of The Manfred Krankl  
5 and Elaine V. Krankl Living Trust.

6                   Representation: Peter A. Goldenring, Pachowicz | Goldenring, 6050 Seahawk  
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8 [law.com](mailto:peter@gopro-law.com).

9                   2.       The quantity of groundwater extracted from the basin by the party is presently  
10 unclear. The well, State Well 04N23W23EO1S, was drilled in August 2010 to a depth of 300  
11 feet with perforations from 150 to 300 feet. The well is located on APN 060-0-150-205. There  
12 is no water meter and the quantity of water extracted is approximately 2-3 acre feet per year,  
13 used for agricultural activities.

14                   3.       These parties assert all legal rights to groundwater, including as overlying water  
15 rights owners, to use and produce groundwater.

16                   4.       The general use of the water has been agricultural, including irrigation.

17                   5.       There is one well as above described.

18                   6.       The area on which the groundwater has been used is for landscaping on the  
19 subject APN and adjoining parcels.

20                   7.       These parties reserve the right to increase usage and for future use of  
21 groundwater.

22                   8.       These parties assert further rights to the beneficial use for any alternative water  
23 heretofore used by these parties converting same to groundwater usage as legally permitted or  
24 as otherwise entitled including, but not limited to, §§1005.1, 1005.2 and/or 1005.4 of the  
25 California Water Code.

26                   9.       These parties assert all legal rights to all surface water associated with the  
27 properties of these parties, including APN 060-0-150-205 and any associated parcels.

28                   ///

1           10.     Responding to the further inquiries under the initial disclosures, the identification  
2 of contact persons are above described, the quantity of water estimated is as above described and  
3 responding parties, while at this time having no other facts to disclose in these initial disclosures,  
4 reserve all rights to discovery, to amend this response and for further disclosures to be filed in  
5 due course.

6 DATED: June 2, 2021

PACHOWICZ / GOLDENRING  
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7  
8  
9 By: \_\_\_\_\_  
PETER A. GOLDENRING

A large, handwritten signature in black ink, written over a horizontal line. The signature is highly stylized and appears to read 'P. Goldenring'. It starts with a large loop on the left side and extends downwards and to the right.



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I declare under penalty of perjury under the laws of the State of California that  
the above is true and correct. Executed on June 3, 2021, at Ventura, California.

  
\_\_\_\_\_  
Sally Hall