

SHAWN HAGERTY, Bar No. 182435
 shawn.hagerty@bbklaw.com
 BEST BEST & KRIEGER LLP
 655 West Broadway, 15th Floor
 San Diego, California 92101
 Telephone: (619) 525-1300
 Facsimile: (619) 233-6118

Exempt From Filing Fees Pursuant to
 Cal. Gov't Code § 6103

CHRISTOPHER M. PISANO, Bar No. 192831
 christopher.pisano@bbklaw.com
 SARAH CHRISTOPHER FOLEY, Bar No. 277223
 sarah.foley@bbklaw.com
 PATRICK D. SKAHAN, Bar No. 286140
 patrick.skahan@bbklaw.com
 BEST BEST & KRIEGER LLP
 300 South Grand Avenue, 25th Floor
 Los Angeles, California 90071
 Telephone: (213) 617-8100
 Facsimile: (213) 617-7480

Attorneys for Respondent and Cross-Complainant

CITY OF SAN BUENAVENTURA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER, a
 California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES CONTROL
 BOARD, etc., et al.,

Respondents.

CITY OF SAN BUENAVENTURA, etc.,

Cross-Complainant,

v.

DUNCAN ABBOTT, an individual, et al.

Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

CITY OF SAN BUENAVENTURA'S
 REPLY TO RESPONSES AND LIMITED
 OPPOSITION TO MOTION TO
 BIFURCATE AND PARTIAL LIFTING OF
 THE DISCOVERY STAY

Date: June 21, 2021
 Time: 1:30 p.m.
 Dept: S10

Action Filed: Sept. 19, 2014
 Trial Date: Not Set

1 I. INTRODUCTION

2 No party submitted an opposition to the concept of bifurcation, and therefore the Court
 3 should bifurcate the trial of this matter into phases, with a first phase covering at least the two
 4 following issues: (1) a determination of the Ventura River Watershed (“Watershed”) boundaries
 5 and the boundaries of the four groundwater basins, and (2) a determination of the interconnection
 6 between the surface water and groundwater in the Watershed, including the interconnection
 7 between surface and groundwater and the four groundwater basins, the Ventura River, and its
 8 tributaries. The only remaining issues to address are the scope, timing and process for phase one
 9 discovery, the date for the phase one trial and whether additional issues should be addressed in
 10 phase one. The City focuses this reply on these limited scope and timing issues.

11 II. FOUR PARTIES’ RESPONSES TO THE MOTION

12 As noted above, while no party opposed the motion to bifurcate trial, four parties filed
 13 responses seeking clarification and expressing concerns about timing and scope of discovery and
 14 trial. Specifically, the responses can be summarized as concerns with: (1) determining the scope
 15 of permissible discovery in the first phase of trial; (2) scheduling and timing of discovery (both
 16 percipient and expert); (3) the selection of a trial date; and (4) the specific issues to be addressed
 17 in phase one. The comments of the four parties who filed responses are summarized as follows:

- 18 1. The State Agencies¹ agree with an appropriate first phase on boundaries of the
 19 Watershed and its four groundwater basins, and the issue of interconnectivity,
 20 (citing Code Civ. Proc., § 840, subd. (b)(5)), and agree that the discovery stay
 21 should be lifted “for the limited purpose of resolving the boundary issues.” (State
 22 Agencies’ Response, at p. 3:9-16.) In addition, the State Agencies expressed
 23 concerns with the City’s proposed trial schedule, and proposed an alternative
 24 schedule based on a phase one trial set for February 7, 2022 (*id.* at pp 3-7);
- 25 2. The City of Ojai “opposes the motion only to the extent that the scope and timing

26
 27 ¹ The State Agencies include Respondent and Intervenor State Water Resources Control Board,
 28 Intervenor California Department of Fish and Wildlife, and Cross-Defendant California
 Department of Parks and Recreation.

of discovery should be determined prior to setting the trial dates and that Phase 1 properly identify the legal issues that will be before the Court” (Ojai’s Limited Opp., at p. 1:13-15). City of Ojai requested a further hearing on the scope of discovery, and commented that the first phase trial must consider whether the Court can determine rights in the four groundwater basins pursuant to Code of Civil Procedure section 832 (*id.* at pp. 2-3);

3. The Loa E. Bliss, 2006 Revocable Trust raised its concerns with the evidence of connectivity that must be presented in a first phase bifurcated hearing, and asserted that a basin by basin analysis is necessary (Response, at p. 2:8-9);
4. Cross-Defendant Robert Martin “does not oppose the City’s Motion to bifurcate” but does oppose the City’s proposed schedule, and submitted an alternative schedule based on a “late summer or early fall of 2022” trial date (Response, at p. 4:4-7).

As explained further herein and in the City’s motion, interconnection will be an issue tried in the first phase of trial. The City agrees that discovery should be limited to the issues to be tried in this phase of trial. Moreover, given the discrete and expert-driven issues to be tried in the first phase of trial, the City maintains that a trial date in mid to late November 2021 is feasible. However, the City does not object to the February 7, 2022 trial date proposed by the State Agencies, which the City asserts is a reasonable “outside” proposal date based on expressed concerns with relevant discovery considerations under the streamlined comprehensive adjudication statutes. By contrast, the Court should reject Cross-Defendant Martin’s proposal of a later summer or early fall 2022 trial date because an earlier trial date is reasonable, feasible and appropriate to move this case forward.

III. THE COURT SHOULD LIFT THE STAY ON DISCOVERY AND LIMIT DISCOVERY TO PHASE ONE TRIAL ISSUES ONLY, BUT SHOULD ORDER THE PARTIES TO MEET AND CONFER BEFORE ANY DISCOVERY IS PROPOUNDED

In addition to bifurcating the case, the Court should partially lift the discovery stay it previously ordered. The City agrees with the City of Ojai that the scope of discovery should be

1 defined and limited, and that the parties should not be permitted to do discovery on issues
2 unrelated to the specific and limited issues to be addressed in phase one. As such, while the City
3 requests that the Court order a partial lifting of the discovery stay to allow for discovery only as
4 to the issues to be tried in the first phase of trial, the City requests that the Court order the parties
5 to meet and confer before any such discovery is propounded, in order to (1) determine if there
6 may be a set of limited, agreed-upon written interrogatories and document demands that all
7 parties who wish to participate in the first phase of trial will respond to, and (2) determine if there
8 can be an agreed-upon list of witnesses who will be deposed solely on the issues to be tried in the
9 first phase of trial. This meet and confer conference should take place within fifteen (15) days of
10 the Court's order, and the City will facilitate the meeting via a zoom conference. If the parties
11 cannot reach an agreement during this meet and confer within fifteen (15) days of the Court's
12 order, a subsequent motion for protective order may be necessary. However, given the limited
13 scope of issues to be tried in the first phase of trial, it would seem that the parties should first be
14 ordered to meet and confer.

15 As part of a meet and confer process, the City requests that the Court also order the parties
16 to consider timing of expert disclosures, and whether any witness testimony, including the
17 testimony of experts, will be presented in writing pursuant to Code of Civil Procedure Section
18 844. The State Agencies commented on the City's proposed schedule for expert disclosures and
19 expressed concerns about deviating from the timing set forth in Code of Civil Procedure section
20 843, subdivision (d). The State Agencies also appear to suggest that the parties submit direct
21 testimony in writing pursuant to Section 844. (Response, at pp. 4:9-5:13.) Section 843 is clear,
22 however, that the parties may stipulate, or the court may order, a different expert disclosure
23 schedule. (Code Civ. Proc., § 843(d) ["If there is no stipulation or court order, the disclosure of
24 an expert witness shall be made as follows . . ."].) The Section 843, subdivision (d) schedule
25 only applies where no contrary stipulation or court order is made. Also, Section 844 is a
26 permissive statute, and the Court has discretion to determine whether direct and rebuttal
27 testimony will be received in writing. The City proposed an alternative expert disclosure
28

1 schedule that is more consistent with timing under the Civil Discovery Act. The City does not
2 see the need to have testimony be presented in writing and does not request that the Court order
3 written testimony under Section 844, but that decision should be made after the parties meet and
4 confer, and after the Court provides input as to its preference for the presentation of evidence at
5 the first phase of trial. In sum, if the Court is not inclined to adopt the City's proposed pre-trial
6 schedule now, the City requests that the Court set a trial date and order the parties to meet and
7 confer regarding an appropriate pre-trial schedule based on the trial date. The Court can then
8 make any order regarding the pre-trial schedule that may be necessary at the July 19th Case
9 Management Conference.

10 **IV. THE CITY PREFERS A NOVEMBER 2021 TRIAL DATE BUT DOES NOT**
OBJECT TO THE STATE AGENCIES' PROPOSED TRIAL DATE

11 The City proposes scheduling a first phase of trial in November 2021 because the two
12 issues to be tried in the first phase of trial are discrete and largely expert witness driven. In
13 addition, the case has already been pending for a lengthy time-period such that a November 2021
14 first phase trial would represent an initial trial date that is more than seven years after Plaintiff
15 Santa Barbara Channelkeeper sued the City in 2014. The City's proposed schedule for trial is
16 consistent with the statutory requirements for percipient and expert discovery in the Civil
17 Discovery Act, and the City requests a discovery schedule that largely tracks the Discovery Act.
18 If the parties wish to stipulate and/or the Court orders deviations from the Civil Discovery Act
19 schedule based on Code of Civil Procedure Sections 843 and 844, as discussed above, that can be
20 set by the Court following a meet and confer conference, which the Court can order to occur
21 within fifteen (15) days.

22 While the City believes that a November 2021 trial date is feasible, and allows the parties'
23 sufficient time to prepare, the City does not object to the State Agencies' proposed February 7,
24 2022 trial date, which will allow the parties some additional time to conduct limited fact-based
25 and expert discovery. This alternative proposed trial date is reasonable as far as the City is
26 concerned, but it is an "outside" date in terms of reasonableness. Cross-Defendant Martin's
27 proposed trial date in late summer/early fall 2022 is not reasonable. It would result in
28

unnecessary delay given the limited issues to be tried, and the need for the case to expeditiously move forward.

V. THE CITY DOES NOT OBJECT TO THE CITY OF OJAI'S REQUEST THAT THE APPLICABILITY OF THE ADJUDICATION STATUTE TO A MULTIPLE BASIN ADJUDICATION SHOULD BE ADDRESSED IN THE FIRST PHASE OF TRIAL

The City of Ojai requests that the Court determine the applicability of the streamlined adjudication statute as a whole to a multiple basin adjudication as part of the first phase of trial. Specifically, the City of Ojai seeks a determination on whether the Court is authorized under Code of Civil Procedure section 832 to consider the four groundwater basins in the Watershed and interconnected surface water as part of a comprehensive adjudication. As the City has previously explained, adjudicating multiple interconnected basins has long been part of the judicial power under common law and the streamlined adjudication statutes expressly do not change that common law. The City therefore has no objection to the Court considering this assertion of the City of Ojai in the phase one trial. The City believes that the Court can make this determination, if deemed necessary, after hearing the evidence that will be presented in the first phase of trial regarding basin boundaries and interconnectivity of the Watershed.

VI. CONCLUSION

For the reasons stated herein, the City respectfully requests that (i) the Court grant this motion to bifurcate, and order a first phase of trial on the issues of the basin and Watershed boundaries, interconnectivity and, if deemed necessary by the Court, the application of the streamlined adjudication statute to this case, (ii) schedule the first phase of trial in approximately mid to late November 2021 or no later than February 7, 2022, and (iii) lift the discovery stay solely for the issues that will be tried in the first phase, and order the parties to meet and confer

///

///

///

///

///

1 within fifteen (15) days of the Court's order to limit discovery and establish a reasonable
2 discovery schedule based on the trial date established by the Court.

3
4 Dated: June 14, 2021

BEST BEST & KRIEGER LLP

5
6 By: 

7 SHAWN HAGERTY
8 CHRISTOPHER M. PISANO
9 SARAH CHRISTOPHER FOLEY
10 PATRICK D. SKAHAN
11 Attorneys for Respondent and
12 Cross-Complainant
13 CITY OF SAN BUENAVENTURA

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
82470.00018\34017364.3

SHAWN HAGERTY, Bar No. 182435
shawn.hagerty@bbklaw.com
BEST BEST & KRIEGER LLP
655 West Broadway, 15th Floor
San Diego, California 92101
Telephone: (619) 525-1300
Facsimile: (619) 233-6118

EXEMPT FROM FILING FEES PURSUANT
TO GOVERNMENT CODE SECTION 6103

CHRISTOPHER M. PISANO, Bar No. 192831
christopher.pisano@bbklaw.com
SARAH CHRISTOPHER FOLEY, Bar No. 277223
sarah.foley@bbklaw.com
PATRICK D. SKAHAN, Bar No. 286140
patrick.skahan@bbklaw.com
Best Best & Krieger LLP
300 South Grand Avenue, 25th Floor
Los Angeles, California 90071
Telephone: (213) 617-8100
Facsimile: (213) 617-7480

Attorneys for Respondent and Cross-Complainant
CITY OF SAN BUENAVENTURA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER, a
California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES CONTROL
BOARD, a California State Agency, et al.,

Respondents.

CITY OF SAN BUENAVENTURA, a
California municipal corporation,

Cross-Complainant

v.

DUNCAN ABBOTT, an individual, et al.

Cross-Defendants.

Case No. 19STCP01176

Judge: Hon. William F. Highberger

PROOF OF SERVICE

Date: June 21, 2021
Time: 1:30 p.m.
Dept: SS10

Action Filed: September 19, 2014
Trial Date: Not Set

PROOF OF SERVICE

I am a resident of the State of California and over the age of eighteen years, and not a party to the action herein; my business address is Best Best & Krieger LLP, 2001 N. Main Street, Suite 390, Walnut Creek, CA 94596. On June 14, 2021, I served the following document(s):

**CITY OF SAN BUENAVENTURA'S REPLY TO RESPONSES AND LIMITED
OPPOSITION TO MOTION TO BIFURCATE AND PARTIAL LIFTING OF THE
DISCOVERY STAY**

- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Walnut Creek, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business.
- ☐ I caused such envelope to be delivered via overnight delivery. Such envelope was deposited for delivery by United Parcel Service following the firm's ordinary business practices.
- ☒ by transmission via **E-Service to File & ServeXpress** to the person(s) set forth below. Local Rules of Court 2.10 (P).
- ☒ **By e-mail or electronic transmission.** I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Daniel Cooper
Sycamore Law
1004 O'Reilly Ave.
San Francisco CA 94129
Tel: (415) 360-2962
daniel@sycamore.law

Matthew Bullock
Deputy Attorney General
California Department of Justice
Natural Resources Law Section
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Tel: (415) 510-3376
matthew.bullock@doj.ca.gov

Attorneys for Petitioner and Plaintiff
Santa Barbara Channelkeeper

Attorneys for Respondent and Defendant State
Water Resources Control Board

Marc N. Melnick
Deputy Attorney General
Attorney General's Office
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Tel: 510-879-0750
Marc.melnick@doj.ca.gov

Eric M. Katz
Supervising Deputy Attorney General
Noah Golden – Krasner
Deputy Attorney General
Carol Boyd
Deputy Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Tel. (213) 269-6343
Fax (213) 897-2802
Eric.Katz@doj.ca.gov
Noah.goldenrasner@doj.ca.gov

Attorneys for Respondent and Defendant State
Water Resources Control Board

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Edward J. Casey
Gina Angiolollo
Alston & Bird LLP
333 South Hope Street, 16th Floor
Los Angeles, CA 90071
Tel: 213.576.1000
ed.casey@alston.com
gina.angiolollo@alston.com

Attorneys for Cross-Defendants AGR
Breeding, Inc.; Bentley Family Limited
Partnership; and Southern California Edison
Company

Carol.boyd@doj.ca.gov

Attorneys for Proposed Intervenor California
Department of Fish & Wildlife

Ryan Blatz
Blatz Law Firm
206 N. Signal St. Suite G
Ojai, CA 93023
Tel: (805) 646-3110
blatzlawfirm@gmail.com
ryan@ryanblatzlaw.com

Attorneys for Cross-Defendants Troy Becker
and Jeri Becker; Janet Boulton; Michael
Boulton; Michael Caldwell; Joseph Peter
Clark, successor in interest to the Joseph
Clark and Linda Epstein Family Trust; Linda
Louise Epstein, successor in interest to the
Joseph Clark and Linda Epstein Family Trust;
Michael I. Cromer and Jody D. Cromer;
Michel A. Etchart, Trustee of the Michel A.
Etchart Separate Property Trust, and Mark W.
Etchart, Trustee of the Mark W. Etchart
Sepertate Property Trust; Lawrence
Hartmann; Ole Konig; Krotona Institute of
Theosophy; Stephen Michtell and Kathleen
Reid Mitchell, Trustees of the Stephen
Mitchell and Byron Katie Trust; North Fork
Springs Mutual Water Company; Stephen
Robert Smith, Trustee of the Charles R. Rudd
and Lola L. Rudd Trust, dated May 20, 2976;
Shlomo Raz; Sylvia Raz; Senior Canyon
Mutual Water Company; Siete Robles Mutual
Water Company; Soule Park Golf Course,
Ltd.; Telos, LLC; Victor C. Timar, Jr. Trustee
of the Timar Family Trust; John Town; Trudie
Town; Asquith Family Limited Partnership,
Ltd.; Burgess Ranch; Cary Cheldin; Cynthia
Daniels; Wayne Francis; David Friend; The
Larry & Pat Hartmann Family Trust; The John
N. Hartmann Trust; Gary Hirschkron; Cheryl
Jensen; Lutheran Church of the Holy Cross of
Ojai, California; Janice Sattler (Mineo); Eitan
Sloustcher; Rogers-Cooper Memorial
Foundation; Robert Norris (not yet appeared);
Patricia Norris; Old Creek Road Mutual
Water Company (not yet appeared); Margaret
Vanderfin; Telos Ojai, LLC (not yet
appeared); Jennifer Ware; The Walker Jr.
Living Trust; David Altman, Trustee of the
1190 El Toro Trust ; Babtiste Foundation;
Sean A. Bennett and Leslie Bennett, Trustees
of the Bennett Family Trust; Dwayne A.
Bower and Marilyn E. Bower Trustees of the

Bower Family Trust; Mark Terry Cline and Bonnie Burreson Cline, Trustees of the Mark Terry Cline and Connie Burreson Cline Revocable Trust; Robert R. Daddi and Darlene J. Daddi; Lucille A. Elrod, Trustee of the John and Lucille Elrod Family Trust; Friend's Stable & Orchard Inc. Daniel Hultgen, Trustee of the Hultgen Living Trust; Ojai Golf, LLC; Three Oaks, LLC, Erica J. Abrams, Trustee of the Erica J. Abrams Trust; Raul E. Alvarado and Hildegard M. Alvarado, Trustees of the Alvarado Family Trust; William Armstrong and April Nardini; Joseph Lynn Barthelemy and Elvira Lilly Barthelemy, Trustees of the Joseph Lynn Barthelemy and Elvira Lilly Barthelemy 2002 Family Trust; James S. Bennett and Carolyn D. Bennett, Trustees of the Bennett Family Trust; Sumeet Bhatia and Michael McDonald; John Joseph Broesamle and Katharine Sue Broesamle, Trustees of the Broesamle Family Trust; Richard Aaron Carlson, Trustee of the Richard Aaron Carlson Trust and Michelle Larson, Trustee of the Michelle Larson Family Trust; Thomas D. Carver and Cynthia L. Carver; Dana Cenicerros, Trustee of the Dana and Dawn Cenicerros Revocable Living Trust; Deborah Lys Martin Crawford; Frank Clay Creasey Jr.; Debra Joy Reed, Trustee of The Debra Joy Reed Revocable Trust Dated November 3, 1994; Frederic Devault; Diana Syvertson, Trustee of the Diana Syvertson Living Trust; Dive Deep L.L.C.; Douglas Roy Parent and Ann Marie Parent; William Erickson; Gelb Enterprises, L.P.; Jan Stephen Granade and Priscilla K. Granade, Trustees of the Granade Family Revocable Living Trust; Margot J. Griswold; Brian C. Haase and Marie Haase, Trustees of the B&M Haase Trust Dated October 8, 2019; Thomas Lann Harper and Jadona Collier-Harper; Ojai-Jackman L.L.C.; Kevin Rainwater and Marianne Ratcliff; Keith M. Nightingale and Victoria V. Nightingale, Trustees of The Nightingale Family Trust; Heide C. Kurtz, Trustee of The Kurtz Family Trust Dated January 19, 2019; Randall Leavitt, Trustee of The Randall B. Leavitt 2010 Trust; Edward C. Leicht and Jacqueline M. Leicht, Trustees of The Leicht Family 2013 Revocable Trust Dated March 1, 2013; Paul Lepiane and Bengtson Bo; Robert Levin and Lisa Solinas, Trustees of The Levin Family Living Trust; Francis Longstaff and Shauna Longstaff, Trustees of The Longstaff Trust Dated

October 11, 2018; Mandy Macaluso, Trustee of The Living Trust of Mandy Macaluso; Marilyn Wallace, Trustee of The Marilyn Wallace Separate Property Trust; Daniel J. McSweeney and Yoko McSweeney; Wendell M. Mortensen and Laura L. Mortensen, Trustees of The Mortensen Family Revocable Trust; Timothy Jerome Murch and Jody Caren Murch, Trustees of The Jodim Family 2007 Trust Dated July 31, 2007; Chris E. Platt and Hanh H. Platt; Robert Erickson, Trustee and Ronald Wilson; Michael D. Robertson and Kimberly A. Robertson, Trustees of The Robertson Family Trust; James P. Robie, Trustee of the Robie Family Trust; Petter Romming and Kimi Romming, Trustees; Marc Saleh, Trustee of The Saleh Family Trust; Konrad Stefan Sonnenfeld, Trustee of The Konrad Stefan Sonnenfeld Living Trust; Mark Sutherland, Trustee of The Sutherland Marital Trust; John H. Thacher and Caroline H. Thacher, Trustees of The Thacher Family Trust Dated January 2004; Gilbert G. Vondriska and Carolyn J. Vondriska, Trustees of The Vondriska Living Trust; William D. Rusin, Sr., Trustee of the William D. Rusin Sr. Revocable Trust; Oscar D. Acosta, Trustee of the Acosta Trust; Chris E. Platt and Hanh H. Plat; Deborah Lys Martin Crawford; Diane Syvertson, Trustee of the Diana Syvertson Living Trust; Erica J. Abrams, Trustee of the Erica J. Abrams Trust; Frank Clay Creasey Jr.; Frederic DeVault; Gilbert G. Vondriska and Carolyn J. Vondriska, Trustees of the Vondriska Living Trust; James P. Robie, Trustee of the Robie Family Trust; John H. Thacher and Caroline H. Thacher, Trustees of the Thacher Family Trust dated January 2004; Mandy Macaluso, Trustee of the Living Trust of Mandy Macaluso; Margot J. Griswold; Mark Sutherland, Trustee of the Sutherland Marital Trust; Randall Leavitt, Trustee of the Randall B. Leavitt 2010 Trust; Raul E. Alvarado and Hildegard M. Alvarado, trustees of the Alvarado Family Trust; Sumeet Bhatia and Michael McDonald; Timothy Jerome Murch and Jody Caren Murch, Trustees of the Jodim Family 2007 Trust dated July 31, 2007; Wendell M. Mortensen and Laura L. Mortensen, Trustees of the Mortensen Family Revocable Trust; Petter Romming and Kimi Romming, Trustees; William Armstrong and April Nardini; William Erickson; Rancho Sueño, LLC

1 William G. Short, Esq.
2 Law Offices of William G. Short
3 Post Office Box 1313
4 Ojai, California 93024-1313
5 Tel: (805) 490-6399
6 Fax: (805) 640-1940
7 billshortesq@me.com

8 Attorney for Cross-Defendant Robin Bernhoft

9 Robert N. Kwong
10 Dennis O. La Rochelle
11 Arnold Larochelle Mathews Vanconas &
12 Zirbel, LLP
13 300 Esplanade Dr Ste 2100
14 Oxnard, CA 93036
15 Tel: (805) 988-9886
16 rk Wong@atozlaw.com

17 Attorneys for Cross-Defendant Casitas
18 Municipal Water District

19 Gregory J. Patterson
20 Musick, Peeler & Garrett LLP
21 2801 Townsgate Road, Suite 200
22 Westlake Village, CA 91361
23 Tel: (805) 418-3103
24 Fax: (805) 418-3101
25 g.patterson@musickpeeler.com

26 Attorneys for Cross-Defendants Robert C.
27 Davis, Jr.; James Finch; Topa Topa Ranch
28 Company, LLC; The Thacher School;
Thacher Creek Citrus, LLC; Ojai Oil
Company; Ojai Valley School; Sharon
Hamm-Booth and David Robert Hamm, Co-
Trustees of The Hamm 2004 Family Trust
Dated April 29, 2004; Reeves Orchard, LLC;
and Ojai Valley Inn

Anthony Lee Francois
Jeremy Talcott
David Deerson
Pacific Legal Foundation
930 G Street
Sacramento, CA 95814-1802
Tel: (916) 419-7111
Fax: (916) 419-7111
alf@pacificlegal.org
TFrancois@pacificlegal.org
jtalcott@pacificlegal.org
ddeerson@pacificlegal.org

Attorney for Cross-Defendant Robin Bernhoft
Patrick Loughman
Cristian Arrieta
Lowthorp, Richards, McMillan, Miller &
Templeman
300 Esplanade Drive, Suite 850
Oxnard, CA 93036
Tel: 805.804.3848
Ploughman@lrmmmt.com
Carrieta@lrmmmt.com

Attorneys for Cross-Defendants Ernest Ford,
Tico Mutual Water Company, and Betty
Withers and Betty Bow Withers Trust

Lindsay F. Nielson
Law Office of Lindsay F. Nielson
845 E Santa Clara Street
Ventura, CA 93001
Tel: 805-658-0977
nielsonlaw@aol.com

Attorneys for Cross-Defendant Meiners Oaks
Water District, Ventura River Water District,
and Jean Marie Webster, Trustee of The
Roger E. and Jean Marie Webster Trust

Jeanne Zolezzi
Herum Crabtree Suntag
5757 Pacific Avenue, Suite 222
Stockton, CA 95207
Tel: (209) 472-7700
Fax: (209) 472.7986
jzolezzi@herumcrabtree.com

Attorneys for Cross-Defendants Meiners Oaks
Water District and Ventura River Water
District

Thomas S. Bunn III
Elsa Sham
Lagerlof Senecal Gosney & Kruse LLP
301 N. Lake Avenue, 10th Floor
Pasadena, CA 91101-5123
Tel.: (626) 793-9400
Fax: (626) 793-5900
tombunn@lagerlof.com
esham@lagerlof.com

Attorneys for Cross-Defendant St. Joseph's
Associates of Ojai, California, Inc. and St.
Joseph's Health and Retirement Center, Janis
Long Nicholas, John Jay Nicholas, Jess Earl
Long (aka Jess E. Long), Johana Rae Long,
and Mary Margaret Long, Janis Long
Nicholas and Jess E. Long as Trustees of the
Long Family Trust

Jeffrey E. Barnes
Chief Assistant County Counsel
Jason Canger
Assistant County Counsel
Office of Ventura County Counsel
800 South Victoria Avenue, L/C #1830
Ventura, CA 93009
Tel.: (805) 654-2879
Fax: (805) 654-2185
jason.canger@ventura.org

Attorneys for Cross-Defendants
Ventura County Watershed Protection District
and County of Ventura

Neal P. Maguire
Ferguson Case Orr Patterson LLP
1050 South Kimball Road
Ventura, CA 93004
Tel: (805) 659-6800
nmaguire@fcoplaw.com

Attorneys for Cross-Defendants Rancho
Matilija Mutual Water Company; Bettina
Chandler, Trustee of the Bettina Chandler
Trust; Martin Gramckow and Linda
Gramckow individually; Martin Gramckow,
Trustee of the Monika G. Huss Irrevocable
Trust, Trustee of the Karin W. Gramckow
Irrevocable Trust, and Trustee of the Kurt J.
Gramckow Irrevocable Trust

Michael J. Van Zandt
Nathan A. Metcalf
Sean G. Herman
Hanson Bridgett LLP
425 Market Street, 26 Floor
San Francisco, CA 94105
Tel: 415-777-3200
Fax: 415-541-9366
mvanzandt@hansonbridgett.com
nmetcalf@hansonbridgett.com
sherman@hansonbridgett.com

Attorneys for Cross-Defendant Ventura
County Watershed Protection District and
County of Ventura

Scott Slater
Bradley Herrema
Christopher Guillen
Brownstein Hyatt Farber Schreck LLP
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101
Tel: (805) 963-7000
Fax: (805) 965-4333
sslater@bhfs.com
bherrema@bhfs.com
cguillen@bhfs.com

Attorneys for Cross-Defendant The Wood-
Claeysens Foundation

Joseph C. Chrisman
Hathaway, Perrett, Webster, Powers,
Chrisman & Gutierrez
5450 Telegraph Road
Ventura, CA 93003
(805) 644-7111
jchrisman@hathawaylawfirm.com

Attorneys for Cross-Defendant Wood-
Claeysens Foundation

Thomas E. Jeffry
Debra J. Albin-Riley
Arent Fox LLP
555 West Fifth Avenue, 48th Floor
Los Angeles, CA 90013-1065
(213) 629-7400
(213) 629-7401
Thomas.jeffry@arentfox.com

Attorneys for Cross-Defendant Community
Memorial Health System

Jennifer T. Buckman
Andrew J. Ramos
Holly Jacobson
Bartkiewicz Kronick & Shanahan, PC
1011 Twenty-Second Street
Sacramento, CA 95816-4907
Tel. (916) 446-4254
Fax (916) 446-4018
jtb@bkslawfirm.com
hjj@bkslawfirm.com

Attorneys for Cross-Defendant City of Ojai

Eric J. Schindler
Michelle J. Berner
Kroesche Schindler LLP
2603 Main Street, Suite 200
Irvine, CA 92614
Tel. (949) 387-0495
Fax (888) 588-0034 Fax
eschindler@kslaw.legal
mberner@kslaw.legal

Attorneys for Cross-Defendant Oak Haven,
LLC

David B. Cosgrove
Jeffrey M. Oderman
Douglas J. Dennington
Jeremy N. Jungreis
Rutan & Tucker, LLP
611 Anton Boulevard, Suite 1400
Costa Mesa, CA 92626-1931
Tel: 714-641-5100
Fax: 714-546-9035
dcosgrove@rutan.com
joderman@rutan.com
ddennington@rutan.com
jjungreis@rutan.com

Attorneys for Cross-Defendant Casitas
Municipal Water District

Andrew Brady
DLA Piper LLP (US)
550 South Hope Street, Suite 2400
Los Angeles, CA 90071-2618
Tel. (213) 330-7700
Fax: (213) 330-7701
andrew.brady@us.dlapiper.com

Attorneys for Cross-Defendant Integritas Ojai,
LLC

David R. Krause-Leemon
BEAUDOIN & KRAUSE-LEEMON LLP
15165 Ventura Blvd., Suite 400
Sherman Oaks, CA 91403
Tel. (818) 205-2809
Fax (818) 788-8104
david@bk-llaw.com

Attorneys for Cross-Defendant RDK Land,
LLC

Brian A. Osborne
Osborne Law Firm
674 County Square Drive, Suite 308
Ventura, CA 93003
Tel. (805) 642-9283
Fax (805) 642-7054
osbornelawyer@gmail.com

Attorney for Cross-Defendants Brian A.
Osborne; Ronald W. Rood and Susan B.
Rood, Trustees of the Rood Family Trust

Adam D. Wieder
Barry C. Groveman
Ryan Hiete
Groveman Hiete LLP
35 East Union Street, Suite B
Pasadena, CA 91103
Tel (626) 747-9383
Fax (626) 747-9370
awieder@grovemanhiete.com
bgroveman@grovemanhiete.com
rhiete@grovemanhiete.com

Attorneys for Cross-Defendant Michael
Bradbury; Heidi Bradbury; and The Heidi
Gramkow Trust

Ernest J. Guadiana
Elkins Kalt Weintraub Reuben Gartside LLP
10345 W. Olympic Boulevard
Los Angeles, CA 90064
Tel. (310) 746-4425
eguadiana@elkinskalt.com

Attorneys for Michael Lombardo and Charles
L. Ward III, as Co-Trustees of the Ward-
Lombardo Living Trust

Patrick L. Rendon
Lamb and Kawakami LLP
333 South Grand Avenue, Suite 4200
Los Angeles, CA 90071
Tel. (213) 630-5500
Fax: (213) 630-5555
prendon@lkfirm.com

Attorneys for Real Party in Interest Emily V.
Brown

David A. Ossentjuk
Ossentjuk & Botti
2815 Townsgate Road, Suite 320
Westlake Village, CA 91361
Tel: (805) 557-8081
Fax: (805) 456-7884
DOssentjuk@oandblawyers.com

Attorney for Cross-Defendant Robert Martin

Peter A. Goldenring
Mark R. Pachowicz
Pachowicz | Goldenring A Professional Law
Corporation
6050 Seahawk Street
Ventura, CA 93003-6622
Tel. (805) 642-6702
Fax (805) 642-3145
attorneys@gopro-law.com
peter@gopro-law.com
mark@pglaw.law

Attorneys for Cross-Defendant The Manfred
Krankl and Elaine V. Krankl Living Trust

Karen A. Feld
Daniel S. Roberts
Cole Huber LLP
3401 Centrelake Drive, Suite 670
Ontario, CA 91761
Tel: (909) 230-4209
Fax: (909) 937-2034
kfeld@colehuber.com
droberts@colehuber.com

Attorneys for Cross-Defendant Ventura
Unified School District

Hermitage Mutual Water Company, and Santa
Ana Ranch, Inc.

Attn: J. Roger Essick
2955 Hermitage Road
Ojai, CA 93023
Tel. (805) 320-1406
rogeressick@gmail.com

1	Julie A. Baker	The Joseph Fedele 1995 Living Trust,
2	2193 Maricopa Hwy	Oriana Marie Fedele, Trustee
3	Ojai, CA 93023	Attn. Oriana Fedele
4	(805) 646-8700	P.O. Box 298
5	Jandjbaker2@gmail.com	Lahaina, HI 96767
6		Tel. (818) 601-3161
7		orianafedele@gmail.com
8		
9	T&D Nevada Trust	Michaela Boehm
10	Dennis and Antoinette Mitchell	12293 topa Lane
11	Mitchell Homes Inc.	Santa Paula, CA 93060
12	P.O. Box 360	Tel. (323) 493-3737
13	Ojai, CA 93024	micboehm@me.com
14	(805) 340-2890	
15	amitc74383@aol.com	
16		
17	Anthonie M. Voogd	Lawrence S. Mihalas
18	918 Palomar Road	Trustees of the Mihalas Family Trust
19	Ojai, CA 93023	419 21 st Place
20	Tel. (805) 646-1512	Santa Monica, CA 90402
21	avoogd@stanfordalumni.org	Tel. (310) 739-0700
22		lmihalas@gmail.com
23		lmihalas@ucla.edu
24		
25	Heather Blair	Martin Hartmann
26	556 So. Fair Oaks Ave., Ste 101	Whitney Hartmann
27	Box 356	430 S. Carrillo Road
28	Pasadena, CA 91105	Ojai, CA 93023
29	Tel. (626) 755-6566	Tel. (805) 798-2253
30	Hblair1946@gmail.com	earthbuilding@gmail.com
31		
32	Robert K. Cartin	Loa E. Bliss
33	Cartin Family LLC	Loa E. Bliss 2006 Revocable Trust
34	505 Estremoz Ct.	9030 Ojai Santa Paula Road
35	Oceanside, CA 92057	Ojai, CA 93023
36	Tel. (760) 429-4738	Tel: (617) 750-8500
37	bob.cartin@dvm.com	loabliss@hotmail.com
38		
39	Del Cielo LLC	Joyce Syme, and
40	Attn. Tim Carey, Managing Member	The Joyce A. Syme Living Trust
41	22410 Hawthorne Boulevard, Suite 5	1760 Ocean Avenue
42	Torrance, CA 90505	Santa Monica, CA 90401
43	Tel. (310) 787-6569	Tel. (310) 403-1760
44	tim@calvoterguide.com	seaviewmotel@hotmail.com
45		
46	Janice and Jesse Hillestad	Dale and Patricia Givner
47	9611 N. Ventura Ave.	12617 Koenigstein Rd.
48	Ventura, CA 93001	Santa Paula, CA 93060
49	Tel. (310) 614-8438	Tel. (805) 525-9524
50	janicehillestad@icloud.com	dalegivner@gmail.com
51	jessehillestad@gmail.com	

Carlos A Mejia
Sophie A Wenzlau
Department of Justice
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Tel. (916) 210-6379
Fax: (916) 327-2319
sophie.wenzlau@doj.ca.gov
carlos.mejia@doj.ca.gov

Attorneys for California Department of Parks
and Recreation

Jacob Slujter
Rabindra Singh
1070 McAndrew Road.
Ojai CA 93023; Tel.
(805) 646-2726
ED@KFA.ORG

In Propria Persona for Krishnamurti
Foundation of America

Kelton Lee Gibson
878 Oak Grove Court
Ojai, CA 93023
Tel. (805) 701-9318
kgibson@mwglaw.com
kgibson878@gmail.com

Kelton Lee Gibson, Trustee of the Gibson
Family Trust, dated June 6, 2006

Rebecca C. Collins
Thomas M. Collins, Jr.
241 Longhorn Lane
Ojai, CA 93023
Tel. 805-312-5894
tominojai@gmail.com
collinst3@sbcglobal.net

Claude R. and Patricia E. Baggerly
119 S. Poli Avenue
Ojai, CA 93023-2144
Tel. (805) 646-0767
Tel. (805) 766-7317
russ.baggerly65@gmail.com

Dennis and Nadine Corte
12812 MacDonald Drive
Ojai, CA 93023
Tel. (805) 701-1950
dwcorte@outlook.com

David R. Greifinger
Law Offices of David R. Greifinger
15515 West Sunset Blvd., No. 214
Pacific Palisades, CA 90272
Tel. (424) 330-0193
tracklaw@me.com

Attorney for Cross-Defendants Danny Everett
and Tiarzha Talyor

George and Sigrid Bressler
340 Longhorn Lane
Ojai, CA 93023
Tel. (805) 646-1221
andybsail@gmail.com

Peter Duchesneau
Sigrid R Waggener
Mannat, Phelps & Phillips, LLP
One Embarcadero Center, 30th Floor
San Francisco, CA 94111
Tel (415) 291-7400
Fax (415) 291-7474
pduchesneau@manatt.com
swaggener@manatt.com

Attorneys for Cross-Defendant Aera Energy,
LLC

Judith L. Mercer
c/o of Jason Goldman
Mercer Family Trust Agreement of 1992
1175 Grand Avenue
Ojai, CA 93023
Tel. (310) 625-7795
jgoldman@begroup.com

Matthew Haffner
Haffner Law Group
86 S. Laurel Street
Ventura, CA 93001
Tel. (805) 641-9334
Fax (805) 980-5014
mhaffner@haffnerlawgroup.com

Attorneys for Cross-Defendant Susan Moll

Harry D. Sims and Raymond P. Sims
P.O. Box 1870
Ojai, CA 93024
Tel. (805) 646-0167
1978simsfamilytrust@gmail.com

Andrew K. Whitman
821 N. Signal Street
Ojai, CA 93023
Tel. (805) 444-5671
sfreberg@scr-legaliner.com

In pro per and Atty for Cross-Defendants
Andrew K. Whitman and Heidi A. Whitman;
Nancy L. Whitman; John R. Whitman and
Nancy L. Whitman Family Trust

Paul R. Huff
The Huff Law Firm APC
21 S. California Street, Suite 205
Ventura, CA 93001
Tel. (805) 667-8940
Fax (805) 850-7399
phuff@hufffirm.com

Attorneys for Barnard Properties, LLC

Henry D. Finkelstein
Brian Moskal
Greenberg Glusker Fields Claman &
Machtiger LLP
2049 Century Park East, Suite 2600
Los Angeles, CA 90067
Tel. (310) 553-3610
Fax (310) 553.0687
hfinkelstein@ggfirm.com
bmoskal@greenbergglusker.com

Attorneys for Ginnetti Living Trust, and
Baldwin Ranch, LLC
Tristan F. Mackprang
David J. Farkas
Coleman Frost LLP
201 Nevada Street, Smoky Hollow
El Segundo, CA 90245
Tel. (424) 277-1650
Fax (31) 648-9739
tristan@colemanfrost.com
david@colemanfrost.com

Attorneys for Cross-Defendants Housing
Authority of the City of San Buenaventura,
Triad Properties, Inc., Encanto Del Mar
Apartments, L.P., Villages at Westview I LP,
Vista Del Mar Commons, LP, and Soho
Associates, L.P.

Christopher Danch
16200 Maricopa Highway
Ojai, CA 93023
Tel. (805) 640-8534
chrisdanch@gmail.com

Attorney for Cross-Defendants Angie Marie
Genasci and Christopher Paul Danch, Trustees
of the Genasci-Danch Family Trust; and
Donald and Wendy Givens

Alessandro (Alex) Lobba
Alessandro Lobba and Mary E. Jackson,
individually as Trustees of the Lobba-Jackson
Family Trust
947 Casitas Vista Road
Ventura, CA 93001
Tel. (805) 895-7056
alobba@gmail.com

Christine Steiner
2560 Ladera Road
Ojai, CA 93023
Tel. (31) 600-3220
csteiner@csteinerlaw.com

William Slaughter
Slaughter, Reagan & Cole, LLP
625 East Santa Clara Street, Suite 101
Ventura, CA 93001
Tel. (805) 658-7800
Fax (805) 644-2131
slaughter@srllplaw.com

Attorneys for The Boyd S. Dron and Karin
Dron Joint Living Trust, and Sisar Mutual
Water Company

Julia Taft-Whitman, President CEO
Taft Corporation
111 West Topa Topa Street
Ojai, CA 93023
Tel. (805) 794-2837
juliawhitman@gmail.com

Jaide Whitman, President
Julia Whitman, Director
Conservation Endowment Fund
P.O. Box 6
Oak View, CA 93022
Tel. (805) 649-2333
Tel. (805) 804-7005
jaide.whitman@gmail.com
TaftGardensOffice@gmail.com

Kelley M. Rasmussen, Trustee
2420 Park Road
Lake Oswego, OR 97034
Tel. (805) 798-7125
kelleyras@gmail.com

Angela Small Booth, Attorney
2175 Valley Meadow Drive
Oak View, CA 93022
Tel. (805) 765-5413
angie@angiesmall.org

William E. Colborn, Jr.
13183 Ojai Road
Santa Paula, CA 93060
Tel. (805) 795-1909
jake@colbornandassociates.com

Rebecca Tickell
350 Verano Drive
Ojai, CA 93023
Tel. (323) 559-5700
rebecca@bigpictureranch.com

Joshua Beckman
913 Oso Road
Ojai, CA 93023
Tel. (323) 404-0465
joshbfbp@gmail.com

Gregg S. Garrison and Rosanna Garrison
Garrison Law Corporation
12986 MacDonald Drive
Ojai, CA 93023
Tel. (650) 726-1111 / Fax: (805) 669-3168
gsgarrison@garrisonlawcorp.com

Robert L. Smith
12777 Tree Ranch Road
Ojai, CA 93023
Tel. (805) 558-6322
treeranch@ymail.com

Susan M. Glennon
292 Cruzero Street
Ojai, CA 93023
Tel. (805) 646-4816
theglennonnest@aol.com

Robin Schwartzburd
411 Franklin Drive
Ojai, CA 93023
Tel. (805) 272-5877
robin.schwartzburd@gmail.com

Melinda Hass
11947 Koenigstein Road
Santa Paula, CA 93060
Tel. (213) 713-4360
mlynnbooking@gmail.com

1 Malinda K. Vaughn
2 Mitchell B. Vaughn
3 12283 Ojai Santa Paula Road
4 Ojai, CA 93023-9323
5 Tel. (805) 890-6616
6 vaughnmb@aol.com

7 Jennifer Jordan Day and Joel Fox
8 909 North Rice Road
9 Ojai, CA 93023
10 Tel. (213) 321-5253
11 jenniferjordanday@gmail.com

12 Catherine Ferro &
13 Catherine Eileen Ferro Inter Vivos Trust
14 312 Montana Road
15 Ojai, CA 93023
16 Tel. (805) 326-1686
17 cepharoah@gmail.com

18 Susan Capper
19 12870 Tree Ranch Road
20 Ojai, CA 93023
21 Tel. (805) 794-6421
22 chelsue@aol.com

23 Joyce L. Heath
24 Joyce Heath, Trustee of the Heath Family
25 Living Trust,
26 P.O. Box 1323
27 Ojai, CA 93024
28 Tel. (805) 290-6231
mamaheath55@gmail.com

Ronald W. Bowman
Trustee of the Bowman Trust dated April 8,
2011
672 W. Villanova Road
Ojai, CA 93023
Tel. (805) 732-4014
ron@l-binc.com

Amy Hueppe
1025 Moreno Drive
Ojai, CA 93023
Tel. (310) 699-4619
amyhueppe@gmail.com

Rebecca D. Schwermer
P. O. Box 174
Santa Paula, CA 93061
Tel. (805) 551-3494
octoberbabies2@verizon.net

Brigitte Lovell, Trustee of Lovell Living Trust
295 Encino Drive
Oak View, CA 93022
Tel. (915) 227-9412
loveb9@gmail.com

Susan C. White
Steven J. White
2 Shorewood Drive
Bellingham, WA 98225
Tel. (425) 891-9249
curranwhite1@hotmail.com

Lindy & Karen C. Goetz
12338 Linda Flora
Ojai, CA 93023-9721
Tel. (805) 649-2526; (805) 794-2312
lindygoetz@roadrunner.com

Thomas M. German
301 N. Drown Avenue
Ojai, CA 93023
Tel. (805) 646-2130
kittycatgirl214@gmail.com

Andrew P. Byrne, Esq.
1140 Highland Avenue, Ste. 250
Manhattan Beach, CA 90266
Tel. (310) 505.7170
Andy@ByrneLaw-LA.com

Attorney for Cross-Defendant Roman
Catholic Archdiocese of Los Angeles, a sole
corporation

Glenn Bator
338 Montana Road
Ojai, CA 93023
Tel. (805) 798-1802
denibator@aol.com

1 Harry Anthony Williams
2 915 Daly Road
3 Ojai, CA 93023
4 Tel. (661) 609-1253
5 Tel. (805) 794-6922
6 awilliam@me.com

Bryan M. Sullivan, Esq.
EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP
6420 Wilshire Boulevard, 17th Floor
Los Angeles, CA 90048
Tel. (323) 301-4660
bsullivan@earlysullivan.com

Attorneys for Cross-Defendant
Jeff Bacon as Trustee of the Villa Nero Trust
Dated January 25, 2000

7 David L. Osias, Esq.
8 Allen Matkins Leck Gamble Mallory & Natsis
9 LLP
10 One America Plaza
11 600 West Broadway, 27th Floor
12 San Diego, CA 92101-0903
13 Tel. (619) 233-1155
14 Fax (619) 233-1158
15 dosias@allenmatkins.com

Laura M. Peakes
John E. Peakes, Jr.
316 Verano Drive
Ojai, CA 93023
Tel. (805) 402-0249
jpeakesjr@aol.com

Attorneys for Cross-Defendant
Jeff Bacon as Trustee of the Villa Nero Trust
Dated January 25, 2000

14 Kelsey Klein
15 Paula Kee
16 1042 Fairview Road
17 Ojai, CA 93023
18 Tel. (805) 640-5154
19 kelseyklein88@gmail.com

Laura R. Schreiner, a.k.a Laura Rearwin
418 Crestview Drive
Ojai, CA 93023
Tel. (805) 479-5400
laura@rearwin.com

18 Paul J. Deneen
19 12170 Ojai Santa Paula Road
20 Ojai, CA 93023-9358
21 Tel. (805) 218-0211
22 paul@carbide.com

Jennifer Carafelli
Robin Schwartzburd
211 Village Commons Boulevard, No. 21
Camarillo, CA 93012
Tel. (805) 340-2540
carafelli@gmail.com

21 Timothy Mahoney
22 10244 Ojai Santa Paula Road
23 Ojai, CA 93023
24 Tel. (323) 252-3309
25 honedog@mac.com

Thomas Adams
Adams & Associates
21781 Ventura Boulevard, Suite 10005
Woodland Hills, CA 93003
Tel. (805) 229-1529
tom@adamsassoc.com

Attorneys for Cross-Defendant 235 La Luna
Owners, an unincorporated association

Salvatore Scarpato
106 Calhoun Lane
Georgetown, TX 78633
Tel. (805) 797-8767
salscarpato@att.net

Robert Kyle
The Robert Kyle Living Trust
715 Sunset Place
Ojai, CA 93023
Tel. (626) 260-5509
robertkyle61@gmail.com

William R. Thatcher
12195 Linda Flora Drive
Ojai, CA 93023-9723
thelostplanetairmen@yahoo.com

David Bishop
Sophie Loire
Tel. (805) 403-5370
frenchiephotos@yahoo.com

Chet Hilgers
Mellanie Hilgers
mellaniehilgers@gmail.com

Stephanie Gustafson
Tel. (805) 646-1423
sgustafson@ovs.org

Kristi Schoeld
Neil Jorgensen
Tel. (805) 272-8360
neilkristi@gmail.com

Robert Turnage
9902 Sulphur Mountain Road
Ojai, CA 93023
Tel. (916) 837-3907
Robert.turnage@sbcglobal.net

Authorized Representative for Cross-
Defendant Meher Mount Corporation

Linda J.G. MacDougall, Trustee of The Linda
J.G. MacdDugall Living Trust
Marsha Kee Strong-Chandler
Richard Holt Robinson
119 E. Channel Islands Blvd.
Port Hueneme, CA 93041
(805) 202-6379
speakerholistic@gmail.com
Via First Class Mail

Gerrold Grigsby
Karen Grigsby
9799 Ojai Santa Paula Road
Ojai, CA 93023
Tel. (805) 649-1624
grigsbyranch@gmail.com

Warren W. Greene
Bonnie M. Greene
958 E. Main Street
Ventura, CA 93001
Tel. (805) 652-1080
Fax (805) 652-0400

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

Executed on June 14, 2021 at Walnut Creek, California


Irene Islas