

1 Trevor Quirk
877 S. Victoria, Ste. 111
2 Ventura, CA 93003
Telephone: 805-650-7778
3 Facsimile: 866-728-7721
4
5

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA
7 COUNTY OF LOS ANGELES
8

9 SANTA BARBARA CHANNELKEEPER, a
California non-profit corporation,

10 Petitioner,

11 v.

12 STATE WATER RESOURCES CONTROL
13 BOARD, et al,

14 Respondents.

15 CITY OF SAN BUENAVENTURA, et al.,

16 Cross-Complainant,

17 v.

18 DUNCAN ABBOTT, an individual, et al.,

19 Cross-Defendants.
20

Case No. 19STCP01176

Judge: Hon. William F. Highberger

DECLARATION OF TREVOR QUIRK
RE: JOINT TRIAL READINESS
CONFERENCE STATEMENT

Date: 03/11/22 FSC

Time: 1:30PM

Dept.: 10

Action Filed: Sept. 19, 2014

Trial Date: March 16, 2022

21 I, Trevor Quirk, declare that:

22 1. I am an attorney duly licensed to practice before all of the Courts of the State of
23 California. I am counsel for myself, Cross-Defendant Trevor Quirk, Trustees of the Quirk/Gooden
24 Family Trust, Roe 199, and my wife, Cross-Defendant Aletheia Gooden, Trustee of the
25 Quirk/Gooden Family Trust, Roe 95. Unless otherwise stated, the contents of this Declaration are
26 based upon my personal knowledge and I could testify competently to the matters stated herein.

27 ///

28 ///

2. I am submitting this Declaration because the City of Ventura's ("CITY") JOINT TRIAL READINESS CONFERENCE STATEMENT ("STATEMENT") is not "joint" and contains self-serving misstatements designed to mislead the Court.

3. For example, the first paragraph of the CITY'S STATEMENT, at page 2, lines 4-6 provides: "[o]n February 4, 2022, the City emailed a draft of this Statement to all parties who have appeared and invited input and joinder and subsequently addressed all comments received or identified areas of dispute." (emphasis added).

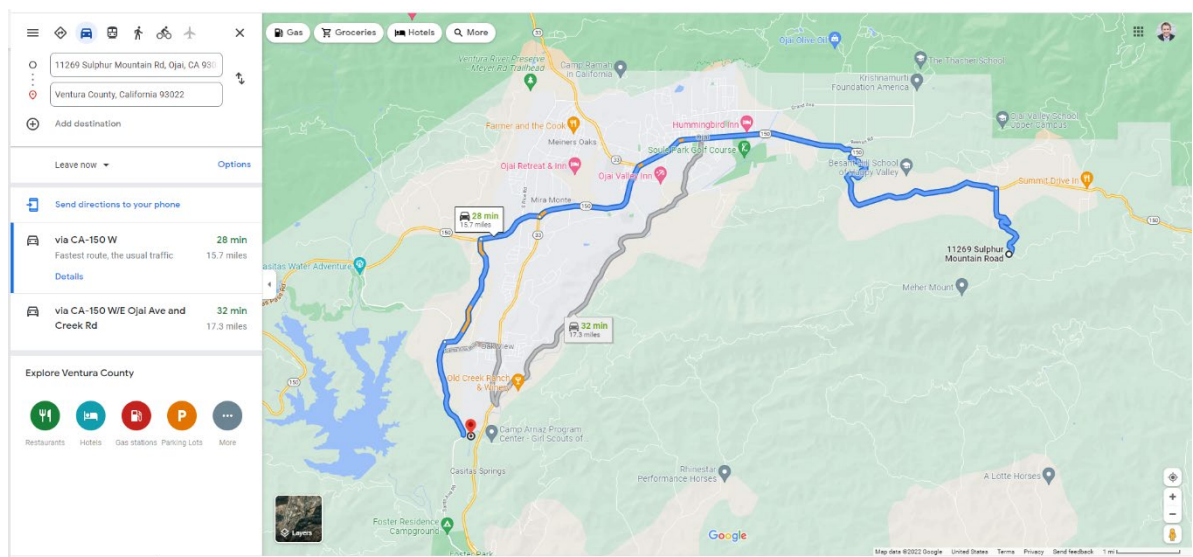
4. Contrary to the CITY's self-serving statement, it has not addressed the issue of whether my wife and I (and all other similarly situated Cross-Defendants the CITY chose to sue), are proper parties to this litigation.

5. My wife and I are trustees of the Quirk/Gooden Family Trust ("TRUST").

6. The TRUST owns two parcels of land, APNs 037-0-011-35 and 037-0-012-220 ("PARCELS") located in Upper Ojai, CA.

7. The PARCELS are located 15 miles away from the Ventura River.

8. This is a true and correct copy of a Google Map depicting driving directions from the PARCELS to the Ventura River:



9. The PARCELS are located outside of the Court determined groundwater basin boundaries.

10. On February 3, 2022, I sent an email to the CITY's lawyers requesting they explain whether property owners, like my wife and I, whose parcels are not within the groundwater basin boundaries are proper parties to this litigation. A true and correct copy of the email correspondence between the CITY and I concerning this issue is attached hereto as **Exhibit 1**.

11. As the Court can see, and contrary to the CITY’s representations, it has not addressed “all comments received or identified areas of dispute.”

I declare under penalty of perjury under the laws of California the foregoing is true and correct and that this Declaration was executed in Ventura, California.

Date: February 7, 2022

Trevor Quirk

EXHIBIT 1

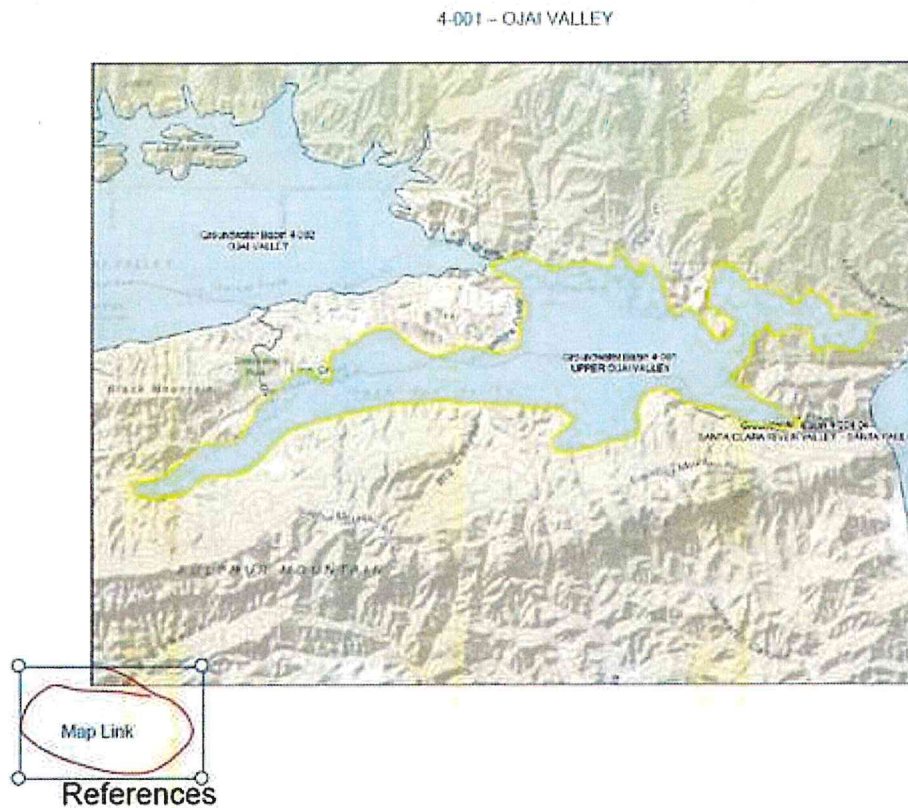
Trevor Quirk

From: Trevor Quirk
Sent: Thursday, February 3, 2022 1:47 PM
To: Irene Islas; 'Adam C. Kear'; 'Adam D. Wieder'; 'Alberto Boada'; 'Alessandro Lobba'; 'Amy Elmore'; 'Amy Hueppe'; 'Andrew Brady'; 'Andrew K. Whitman'; 'Andrew P. Byrne'; 'Angela Small Booth'; 'Anthonie M. Voogd'; 'Barry C. Groveman'; 'Brad Brian'; 'Bradley Herrema'; 'Brandon Hansen'; 'Brent L. Vossler'; 'Brian A. Osborne'; 'Brian Moskal'; 'Brigitte Lovell'; 'Byran M. Sullivan'; 'Carlos Mejia'; 'Carol Boyd'; 'Catherine Eileen Ferro'; 'Christine Steiner'; 'Christopher Danch'; 'Christopher Guillen'; 'Christopher Pisano'; 'Christopher Stolz'; 'Claire Brian'; 'Claude R. Baggerly'; 'Cristian Arrieta'; 'Dale Givner'; 'Daniel Cooper'; 'Daniel S. Roberts'; 'David A. Ossentjuk'; 'David Bishop and Sophie Lorie'; 'David L. Osias'; 'David R. Greifinger'; 'David R. Krause-Leemon'; 'Dennis Corte'; 'Dennis Mitchell'; 'Douglas J. Dennington'; 'Ed Casey'; 'Elsa Sham'; 'Eric Katz'; 'Ernest J. Guadiana'; 'George Bressler'; 'Gerrold and Karen Grigsby'; 'Gina Angiolillo'; 'Glenn Bator'; 'Gregg S. Garrison'; 'Gregory Patterson'; 'Harry and Raymond Sims'; 'Harry Anthony Williams'; 'Heather Blair'; 'Henry D. Finkelstein'; 'Holly Jacobson'; 'J. Roger Essick'; 'Jaide Whitman'; 'James A. Vickman'; 'Janice Hillestad'; 'Jason Canger'; 'Jason Goldman'; 'Jeanne Zolezzi'; 'Jeffrey Oderman'; 'Jennifer Carafelli'; 'Jennifer Jordan Day'; 'Jennifer T. Buckman'; 'Jeremy Jungreis'; 'Jesse Hillestad'; 'John E. Peakes, Jr.'; 'Joseph Chrisman'; 'Joshua Beckman'; 'Joyce L. Heath'; 'Joyce Syme'; 'Julia J. Park'; 'Julia Taft-Whitman'; 'Julia Whitman'; 'Julie A. Baker'; 'Justin Fisch'; 'Justin M. Alvarez'; 'Karen A. Feld'; 'Kathleen Janetatos Smith'; 'Kelley M. Rasmussen'; 'Kelsey Klein'; 'Kelton Lee Gibson'; 'Kelton Lee Gibson'; 'Kristi Schoeld and Neil Jorgensen'; 'L. Fraley'; 'Laura Schreiner, a.k.a Laura Rearwin'; 'Lawrence S. Mihalas'; 'Leslie L. Clark'; 'Linda J.G. MacDougall'; 'Lindsay Nielson'; 'Lindy Goetz'; 'Loa E. Bliss'; 'Malinda K. Vaughn and Mitchell B. Vaughn'; 'Marc Melnick'; 'Mark Pachowicz'; 'Martin Hartmann'; 'Matthew Bullock'; 'Melinda Haas'; 'Mellanie Hilgers'; 'Michael Van Zandt'; 'Michael W. Price'; 'Michaela Boehm'; 'Michelle J. Berner'; 'Miles P. Hogan (mhogan@cityofventura.ca.gov)'; 'Nancy J. Johnson'; 'Nathan Metcalf'; 'Neal Maguire'; 'Noah Goldenkrasner'; 'Oriana Marie Fedele'; 'Patrick Loughman'; 'Patrick Skahan'; 'Paul J. Deneen'; 'Paul R. Huff'; 'Peter Duchesneau'; 'Peter Goldenring'; 'Rabindra Singh'; 'Rebecca C. Collins'; 'Rebecca D. Schwermer'; 'Rebecca Tickell'; 'Robert K. Cartin'; 'Robert Kwong'; 'Robert Kyle'; 'Robert L. Smith'; 'Robert Turnage'; 'Robin Schwartzburd'; 'Ronald W. Bowman'; 'Ryan Blatz'; 'Ryan Hiete'; 'Salvatore Scarpato'; 'Scott Slater'; 'Sean Herman'; 'Shawn Hagerty'; 'Sigrid Waggener'; 'Sophie A Wenzlau'; 'Stacey Birchfield'; 'Stephanie Gustafson'; 'Susan and Steven White'; 'Susan Capper'; 'Susan M. Glennon'; 'Thomas Adams'; 'Thomas Bunn'; 'Thomas C. Collins, Jr.'; 'Thomas E. Jeffry'; 'Thomas G. Gehring'; 'Thomas M. German'; 'Tiernan Dolan'; 'Tim Carey'; 'Hogan, Miles'; 'Timothy Mahoney'; 'Tom Maloney'; 'Tony Francois'; 'Tucker Wisdom-Stack'; 'William E. Colborn, Jr.'; 'William R. Thatcher'; 'William Short'; 'William Slaughter'; 'William Tarantino'; 'William Tarantino'; 'William W. Carter'; 'Ha.Chung@alston.com'; 'Aletheia Gooden'; 'brandon@weldo.com'; 'kitstolz@gmail.com'; 'elmoreaw@gmail.com'; Elianna Gomez
Cc: Shawn Hagerty; Christopher Pisano; Patrick Skahan; Marnie Prock; Sarah Foley; Elizabeth Balloue; Aletheia Gooden
Subject: RE: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

Vta City Counsel:

The Court’s Order provides the “boundaries of the Watershed’s four groundwater basins as defined by California’s Department of Water Resources in Bulletin 118.”

The Order provides a hyperlink at the bottom of the map:

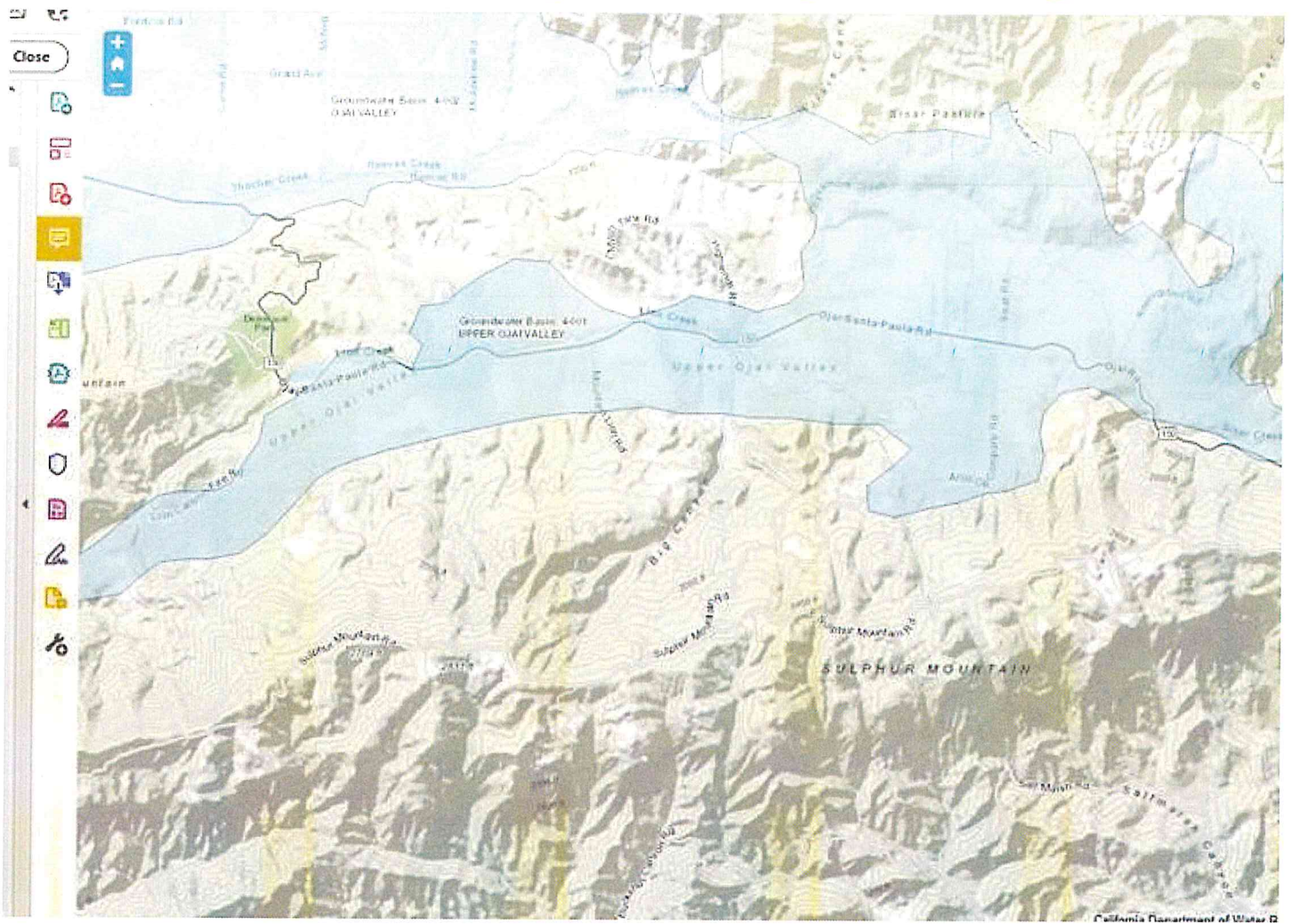


This table contains the reference listings for the citations noted in the Summary. Each reference contains the name of the reference and the publication date. For more information, email sgmps@water.ca.gov.

| Citation | Pub |
|----------|-----|
|----------|-----|

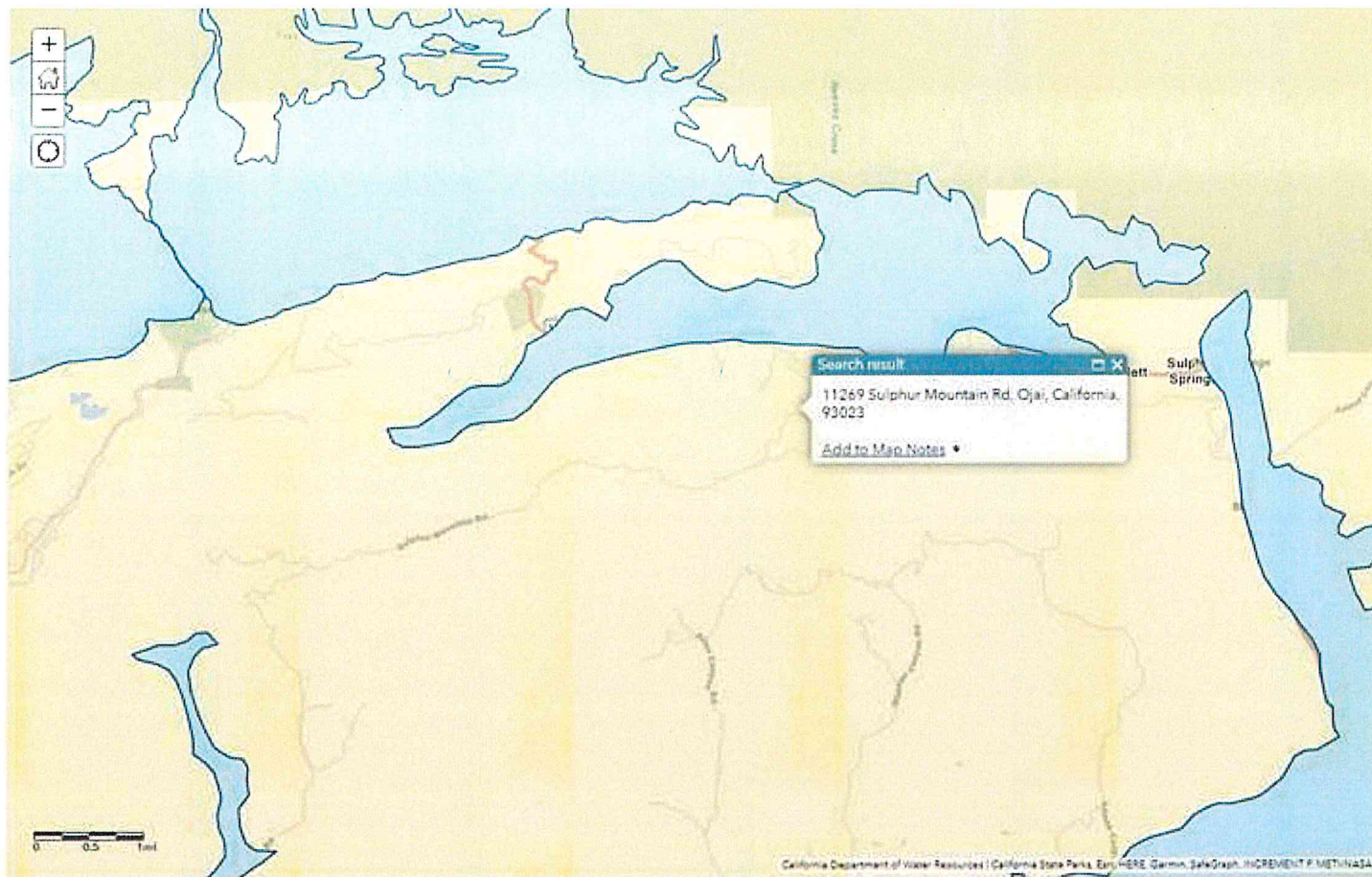
I clicked on the link. It takes me to this SGMA map:

<https://sgma.water.ca.gov/webgis/?appid=160718113212&subbasinid=4-003.01>



The above SGMA map is different from DWR's B 118 map found here:

https://www.arcgis.com/home/webmap/viewer.html?url=https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_B118_CA_GroundwaterBasins/FeatureServer



My address is not within the groundwater basin boundary on either map. Does that mean we should not be included in this litigation?

Please advise.

Thank you,

Trevor

Trevor Quirk, Esq.

American Board
of Trial Advocates



Voted 2017 Ventura County Trial Lawyers Association Trial Lawyer of the Year.

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Las Vegas, NV 89128

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Thank you.

From: Irene Islas <Irene.Islas@bbklaw.com>

Sent: Thursday, February 3, 2022 12:47 PM

To: 'Adam C. Kear' <ackear@gmail.com>; 'Adam D. Wieder' <awieder@grovemanhiete.com>; 'Alberto Boada' <alberto.boada@ventura.org>; 'Alessandro Lobba' <alobba@gmail.com>; 'Amy Elmore' <elmoreaw@gmail.com>; 'Amy Hueppe' <amychueppe@gmail.com>; 'Andrew Brady' <andrew.brady@us.dlapiper.com>; 'Andrew K. Whitman' <sfreberg@scr-legal.com>; 'Andrew P. Byrne' <Andy@ByrneLaw-LA.com>; 'Angela Small Booth' <angie@angiesmall.org>; 'Anthonie M. Voogd' <avoogd@stanfordalumni.org>; 'Barry C. Groveman' <bgroveman@grovemanhiete.com>; 'Brad Brian' <brad.brian@mto.com>; 'Bradley Herrema' <bherrema@bhfs.com>; 'Brandon Hansen' <brandon@welldo.com>; 'Brent L. Vossler' <bvossler@kslaw.legal>; 'Brian A. Osborne' <osbornelawyer@gmail.com>; 'Brian Moskal' <bmoskal@greenbergglusker.com>; 'Brigitte Lovell' <loveb9@gmail.com>; 'Byran M. Sullivan' <bsullivan@earlysullivan.com>; 'Carlos Mejia' <carlos.mejia@doj.ca.gov>; 'Carol Boyd' <carol.boyd@doj.ca.gov>; 'Catherine Eileen Ferro' <cepharoah@gmail.com>; 'Christine Steiner' <csteiner@csteinerlaw.com>; 'Christopher Danch' <chrisdanch@gmail.com>; 'Christopher Guillen' <cguillen@bhfs.com>; 'Christopher Pisano' <Christopher.Pisano@bbklaw.com>; 'Christopher Stolz' <kitstolz@gmail.com>; 'Claire Brian' <cbrian8587@gmail.com>; 'Claude R. Baggerly' <russ.baggerly65@gmail.com>; 'Cristian Arrieta' <Carrieta@lrmmmt.com>; 'Dale Givner' <dalegivner@gmail.com>; 'Daniel Cooper' <daniel@sycamore.law>; 'Daniel S. Roberts' <droboterts@colehuber.com>; 'David A. Ossentjuk' <DOssentjuk@oandblawyers.com>; 'David Bishop and Sophie Lorie' <frenchiephotos@yahoo.com>; 'David L. Osias' <dosias@allenmatkins.com>; 'David R. Greifinger' <tracklaw@me.com>; 'David R. Krause-Leemon' <david@bk-llaw.com>; 'Dennis Corte' <dwcorte@outlook.com>; 'Dennis Mitchell' <amitc74383@aol.com>; 'Douglas J. Dennington' <ddennington@rutan.com>; 'Ed Casey' <ed.casey@alston.com>; 'Elsa Sham' <esham@lagerlof.com>; 'Eric Katz' <Eric.Katz@doj.ca.gov>; 'Ernest J. Guadiana' <eguadiana@elkinskalt.com>; 'George Bressler' <andybsail@gmail.com>; 'Gerrold and Karen Grigsby' <grigsbyranch@gmail.com>; 'Gina Angiolillo' <gina.angiolillo@alston.com>; 'Glenn Bator' <denibator@aol.com>; 'Gregg S. Garrison' <gsgarrison@garrisonlawcorp.com>; 'Gregory Patterson' <g.patterson@musicpeeler.com>; 'Harry and Raymond Sims' <1978simsfamilytrust@gmail.com>; 'Harry Anthony Williams' <awilliam@me.com>; 'Heather Blair' <Hblair1946@gmail.com>; 'Henry D. Finkelstein' <hfinkelstein@ggfirm.com>; 'Holly Jacobson' <hjj@bkslawfirm.com>; 'J. Roger Essick' <rogeressick@gmail.com>; 'Jaide Whitman' <jaide.whitman@gmail.com>; 'James A. Vickman' <jv@vickmanassociates.com>; 'Janice Hillestad' <janicehillestad@icloud.com>; 'Jason Canger' <jason.canger@ventura.org>; 'Jason Goldman' <jgoldman@begroup.us>; 'Jeanne Zolezzi'

<jzolezzi@herumcrabtree.com>; 'Jeffrey Oderman' <joderman@rutan.com>; 'Jennifer Carafelli' <carafelli@gmail.com>; 'Jennifer Jordan Day' <jenniferjordanday@gmail.com>; 'Jennifer T. Buckman' <jtb@bkslawfirm.com>; 'Jeremy Jungreis' <jjungreis@rutan.com>; 'Jesse Hillestad' <jessehillestad@gmail.com>; 'John E. Peakes, Jr.' <jpeakesjr@aol.com>; 'Joseph Chrisman' <jchrisman@hathawaylawfirm.com>; 'Joshua Beckman' <joshbfbp@gmail.com>; 'Joyce L. Heath' <mamaheath55@gmail.com>; 'Joyce Syme' <seaviewmotel@hotmail.com>; 'Julia J. Park' <julia@tomgehring.com>; 'Julia Taft-Whitman' <juliawhitman@gmail.com>; 'Julia Whitman' <TaftGardensOffice@gmail.com>; 'Julie A. Baker' <Jandjbaker2@gmail.com>; 'Justin Fisch' <jfisch@mofo.com>; 'Justin M. Alvarez' <jalvarez@alvarezfirm.com>; 'Karen A. Feld' <kfeld@colehuber.com>; 'Kathleen Janetatos Smith' <kathismith@sbcglobal.net>; 'Kelley M. Rasmussen' <kelleyras@gmail.com>; 'Kelsey Klein' <kelseyklein88@gmail.com>; 'Kelton Lee Gibson' <kgibson878@gmail.com>; 'Kelton Lee Gibson' <kgibson@mwglaw.com>; 'Kristi Schoeld and Neil Jorgensen' <neilkristi@googlemail.com>; 'L. Fraley' <lfraley@kslaw.legal>; 'Laura Schreiner, a.k.a Laura Rearwin' <laura@rearwin.com>; 'Lawrence S. Mihalas' <lmihalas@gmail.com>; 'Leslie L. Clark' <leslie@nomadgal.com>; 'Linda J.G. MacDougall' <speakerholistic@gmail.com>; 'Lindsay Nielson' <nielsonlaw@aol.com>; 'Lindy Goetz' <lindygoetz@roadrunner.com>; 'Loa E. Bliss' <loabliss@hotmail.com>; 'Malinda K. Vaughn and Mitchell B. Vaughn' <vaughnmb@aol.com>; 'Marc Melnick' <Marc.melnick@doj.ca.gov>; 'Mark Pachowicz' <mark@pglaw.law>; 'Martin Hartmann' <earthbuilding@gmail.com>; 'Matthew Bullock' <matthew.bullock@doj.ca.gov>; 'Melinda Haas' <mlynnbooking@gmail.com>; 'Mellanie Hilgers' <mellaniehilgers@gmail.com>; 'Michael Van Zandt' <mvanzandt@hansonbridgett.com>; 'Michael W. Price' <michael@nomadgal.com>; 'Michaela Boehm' <Micboehm@me.com>; 'Michelle J. Berner' <mberner@kslaw.legal>; 'Miles P. Hogan (mhogan@cityofventura.ca.gov)' <mhogan@cityofventura.ca.gov>; 'Nancy J. Johnson' <Nancy.Johnson@berliner.com>; 'Nathan Metcalf' <nmetcalf@hansonbridgett.com>; 'Neal Maguire' <nmaguire@fcoplax.com>; 'Noah Goldenkrasner' <Noah.GoldenKrasner@doj.ca.gov>; 'Oriana Marie Fedele' <orianafedele@gmail.com>; 'Patrick Loughman' <ploughman@lrmmt.com>; 'Patrick Skahan' <Patrick.Skahan@bbklaw.com>; 'Paul J. Deneen' <paul@carbide.com>; 'Paul R. Huff' <phuff@hufffirm.com>; 'Peter Duchesneau' <pduchesneau@manatt.com>; 'Peter Goldenring' <peter@gopro-law.com>; 'Rabindra Singh' <ED@KFA.ORG>; 'Rebecca C. Collins' <tominojai@gmail.com>; 'Rebecca D. Schwermer' <octoberbabies2@verizon.net>; 'Rebecca Tickell' <rebecca@bigpictureranch.com>; 'Robert K. Cartin' <bob.cartin@dvm.com>; 'Robert Kwong' <rk Wong@atozlaw.com>; 'Robert Kyle' <robertkyle61@gmail.com>; 'Robert L. Smith' <treeranch@ymail.com>; 'Robert Turnage' <Robert.turnage@sbcglobal.net>; 'Robin Schwartzburd' <robin.schwartzburd@gmail.com>; 'Ronald W. Bowman' <ron@l-binc.com>; 'Ryan Blatz' <ryan@ryanblatzlaw.com>; 'Ryan Hiete' <rhiete@grovemanhiete.com>; 'Salvatore Scarpato' <salscarpato@att.net>; 'Scott Slater' <sslater@bhfs.com>; 'Sean Herman' <sherman@hansonbridgett.com>; 'Shawn Hagerty' <Shawn.Hagerty@bbklaw.com>; 'Sigrid Waggener' <swaggener@manatt.com>; 'Sophie A Wenzlau' <sophie.wenzlau@doj.ca.gov>; 'Stacey Birchfield' <stacey.birchfield@gmail.com>; 'Stephanie Gustafson' <sgustafson@ovs.org>; 'Susan and Steven White' <curranwhite1@hotmail.com>; 'Susan Capper' <chelsue@aol.com>; 'Susan M. Glennon' <theglennonest@aol.com>; 'Thomas Adams' <tom@adamsassocs.com>; 'Thomas Bunn' <tombunn@lagerlof.com>; 'Thomas C. Collins, Jr.' <collinst3@sbcglobal.net>; 'Thomas E. Jeffry' <thomas.jeffry@arentfox.com>; 'Thomas G. Gehring' <tom@tomgehring.com>; 'Thomas M. German' <kittycatgirl214@gmail.com>; 'Tiernan Dolan' <tdolan@hacityventura.org>; 'Tim Carey' <tim@calvoterguide.com>; 'Hogan, Miles' <mhogan@cityofventura.ca.gov>; 'Timothy Mahoney' <honedog@mac.com>; 'Tom Maloney' <tom@ovlc.org>; 'Tony Francois' <tfrancois@briscoelaw.net>; 'Tucker Wisdom-Stack' <Tucker.Wisdom-Stack@dot.ca.gov>; 'William E. Colborn, Jr.' <jake@colbornandassociates.com>; 'William R. Thatcher' <thelostplanetairmen@yahoo.com>; 'William Short' <billshortesq@me.com>; 'William Slaughter' <slaughter@srllplaw.com>; 'William Tarantino' <wtarantino@mofo.com>; 'William Tarantino' <info@venturalandtrust.org>; 'William W. Carter' <w.carter@musickpeeler.com>; 'Ha.Chung@alston.com' <Ha.Chung@alston.com>; 'Aletheia Gooden' <asg@qlflaw.com>; 'Trevor Quirk' <tmq@qlflaw.com>; 'brandon@weldo.com' <brandon@weldo.com>; 'kitstolz@gmail.com' <kitstolz@gmail.com>; 'elmoreaw@gmail.com' <elmoreaw@gmail.com>; 'Elianna Gomez' <eg@qlflaw.com>

Cc: Shawn Hagerty <Shawn.Hagerty@bbklaw.com>; Christopher Pisano <Christopher.Pisano@bbklaw.com>; Patrick Skahan <Patrick.Skahan@bbklaw.com>; Marnie Prock <Marnie.Prock@bbklaw.com>; Sarah Foley <Sarah.Foley@bbklaw.com>; Elizabeth Balloue <Elizabeth.Balloue@bbklaw.com>

Subject: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

Good afternoon,
Attached please find the Notice of Entry of Order Establishing Watershed and Basin Boundaries.
Thank you,



Irene Islas
Legal Secretary
irene.islas@bbklaw.com
T: (925) 977-3312
www.BBKlaw.com  

This email and any files or attachments transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and immediately delete the email you received.

EXHIBIT 2

Trevor Quirk

From: Sarah Foley <Sarah.Foley@bbklaw.com>
Sent: Friday, February 4, 2022 11:20 AM
To: Trevor Quirk
Cc: Shawn Hagerty; Christopher Pisano; Patrick Skahan; Marnie Prock; Elizabeth Balloue; Irene Islas
Subject: RE: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries
Attachments: Ventura River and Tributaries Map-c1.PDF; Quirk Map.JPG

Mr. Quirk,

The City of Ventura has identified your parcels, APNs 037-0-011-035, 037-0-012-220, addresses 11269/11271 SULPHUR MOUNTAIN R, as located adjacent to the Ventura River and/or one of its tributaries (see attached "Quirk Map"), and thus you are properly named as a cross-defendant in the City's Third Amended Cross-Complaint and belong in this adjudication of the Ventura River Watershed, including its surface waters and its groundwater basins. Also attached is an illustrative map of the surface waters of the Ventura River and its tributaries, which is attached as Exhibit A to the City's Third Amended Cross-Complaint. If you have specific questions about your property, please contact us, and we can schedule a Zoom conference to discuss it.

Thank you,

Sarah



Sarah Christopher Foley

Partner

sarah.foley@bbklaw.com

T: (213) 787-2560 C: (213) 435-8603

www.BBKlaw.com 

From: Trevor Quirk <tmq@qlflaw.com>
Sent: Thursday, February 3, 2022 3:47 PM
To: Irene Islas <Irene.Islas@bbklaw.com>; 'Adam C. Kear' <ackear@gmail.com>; 'Adam D. Wieder' <awieder@grovesmanhiete.com>; 'Alberto Boada' <alberto.boada@ventura.org>; 'Alessandro Lobba' <alobba@gmail.com>; 'Amy Elmore' <elmoreaw@gmail.com>; 'Amy Hueppe' <amyhueppe@gmail.com>; 'Andrew Brady' <andrew.brady@us.dlapiper.com>; 'Andrew K. Whitman' <sfreberg@scr-legal.com>; 'Andrew P. Byrne' <Andy@ByrneLaw-LA.com>; 'Angela Small Booth' <angie@angiesmall.org>; 'Anthonie M. Voogd' <avoogd@stanfordalumni.org>; 'Barry C. Groveman' <bgroveman@grovesmanhiete.com>; 'Brad Brian' <brad.brian@mto.com>; 'Bradley Herrema' <bherrema@bhfs.com>; 'Brandon Hansen' <brandon@welldo.com>; 'Brent L. Vossler' <bvossler@kslaw.legal>; 'Brian A. Osborne' <osbornelawyer@gmail.com>; 'Brian Moskal' <bmoskal@greenbergglusker.com>; 'Brigitte Lovell' <loveb9@gmail.com>; 'Byran M. Sullivan' <bsullivan@earlysullivan.com>; 'Carlos Mejia' <carlos.mejia@doj.ca.gov>; 'Carol Boyd' <carol.boyd@doj.ca.gov>; 'Catherine Eileen Ferro' <cepharoah@gmail.com>; 'Christine Steiner' <csteiner@csteinerlaw.com>; 'Christopher Danch' <chrisdanch@gmail.com>; 'Christopher Guillen' <cguillen@bhfs.com>; Christopher Pisano <Christopher.Pisano@bbklaw.com>; 'Christopher Stolz' <kitstolz@gmail.com>; 'Claire Brian' <cbrian8587@gmail.com>; 'Claude R. Baggerly' <russ.baggerly65@gmail.com>; 'Cristian Arrieta' <Carrieta@Irmmt.com>; 'Dale Givner' <dalegivner@gmail.com>; 'Daniel Cooper' <daniel@sycamore.law>; 'Daniel S. Roberts' <drosberts@colehuber.com>; 'David A. Ossentjuk' <DOssentjuk@oandblawyers.com>; 'David Bishop and Sophie Lorie' <frenchiephotos@yahoo.com>; 'David L. Osias' <dosias@allenmatkins.com>; 'David R. Greifinger' <tracklaw@me.com>; 'David R. Krause-Leemon'

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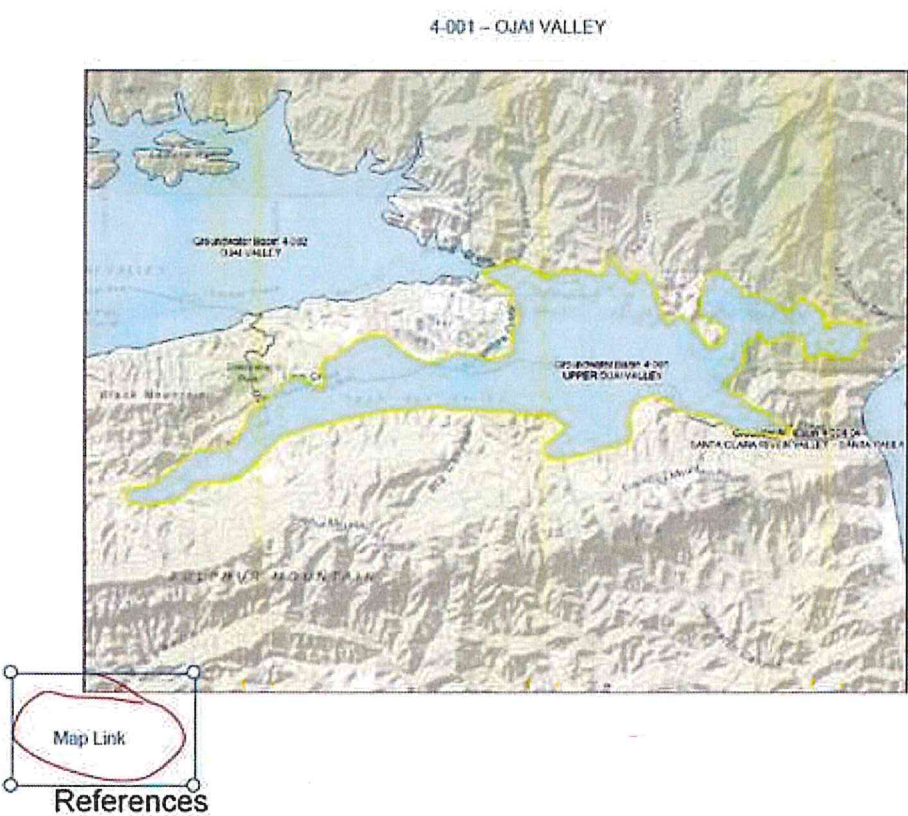
<billshortesq@me.com>; 'William Slaughter' <slaughter@srllplaw.com>; 'William Tarantino' <wtarantino@mofo.com>; 'William Tarantino' <info@venturalandtrust.org>; 'William W. Carter' <w.carter@musickpeeler.com>; 'Ha.Chung@alston.com' <Ha.Chung@alston.com>; Aletheia Gooden <asg@qlflaw.com>; 'brandon@weldo.com' <brandon@weldo.com>; 'kitstolz@gmail.com' <kitstolz@gmail.com>; 'elmoreaw@gmail.com' <elmoreaw@gmail.com>; Elianna Gomez <eg@qlflaw.com>
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Subject: RE: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

CAUTION - EXTERNAL SENDER.

Vta City Counsel:

The Court’s Order provides the “boundaries of the Watershed’s four groundwater basins as defined by California’s Department of Water Resources in Bulletin 118.”

The Order provides a hyperlink at the bottom of the map:

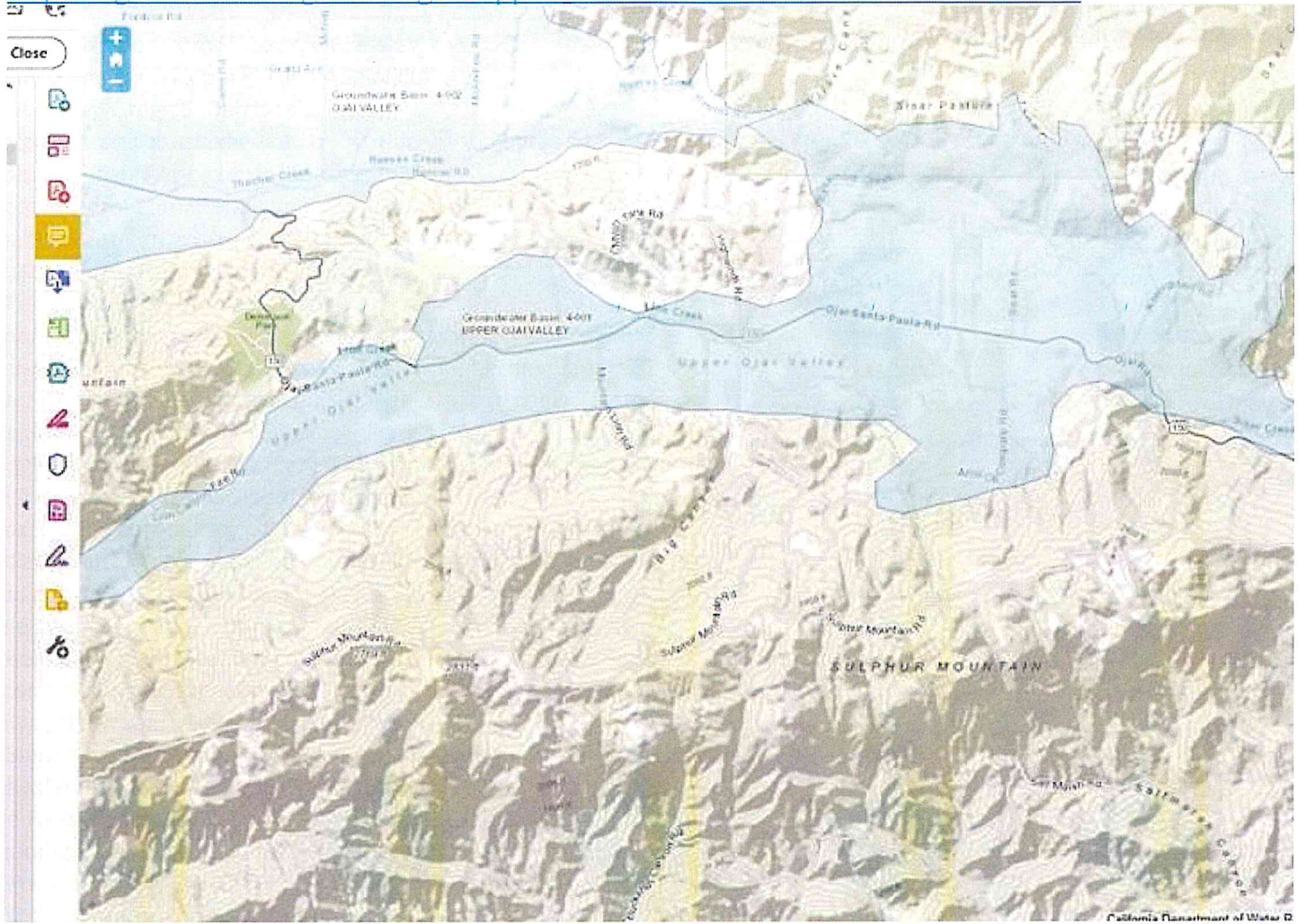


This table contains the reference listings for the citations noted in the Summary. Each reference contains the name of the reference and the publication date. For more information, email sgmps@water.ca.gov.

| Citation | Pub |
|----------|-----|
|----------|-----|

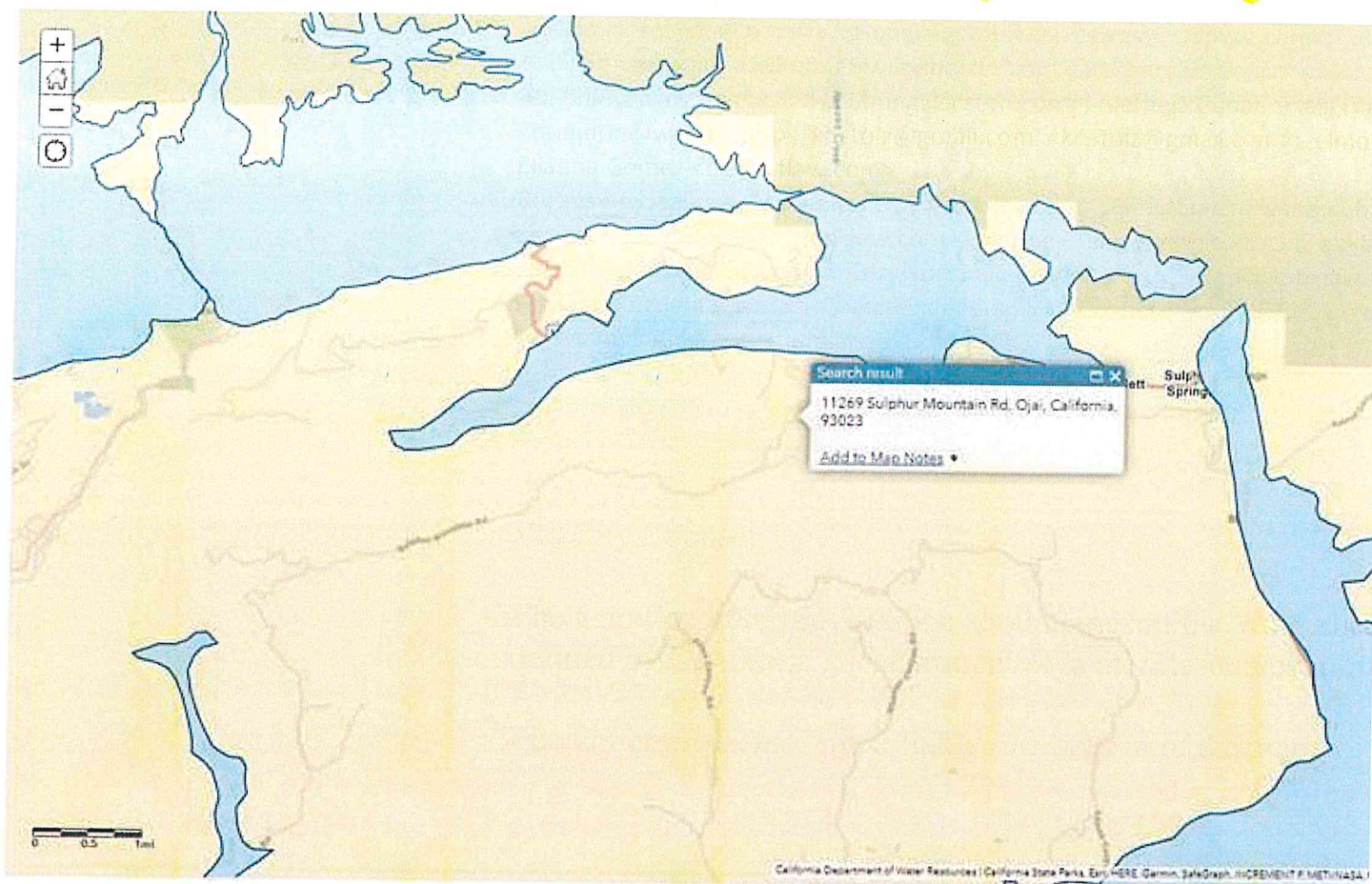
I clicked on the link. It takes me to this SGMA map:

<https://sgma.water.ca.gov/webgis/?appid=160718113212&subbasinid=4-003.01>



The above SGMA map is different from DWR's B 118 map found here:

https://www.arcgis.com/home/webmap/viewer.html?url=https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_B118_CA_GroundwaterBasins/FeatureServer



My address is not within the groundwater basin boundary on either map. Does that mean we should not be included in this litigation?

Please advise.

Thank you,

Trevor

Trevor Quirk, Esq.

American Board
of Trial Advocates



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Thank you.

From: Irene Islas <Irene.Islas@bbklaw.com>

Sent: Thursday, February 3, 2022 12:47 PM

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Subject: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing
 Watershed and Basin Boundaries

Good afternoon,

Attached please find the Notice of Entry of Order Establishing Watershed and Basin Boundaries.

Thank you,



Irene Islas

Legal Secretary

irene.islas@bbklaw.com

T: (925) 977-3312

www.BBKlaw.com



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Sent: Friday, February 4, 2022 3:56 PM
To: 'Stacey Birchfield'; Trevor Quirk
Cc: Adam C. Kear; Adam D. Wieder; Alberto Boada; Alessandro Lobba; Amy Hueppe; Andrew Brady; Andrew K. Whitman; Andrew P. Byrne; Angela Small Booth; Anthonie M. Voogd; Barry C. Groveman; Brad Brian; Bradley Herrema; Brandon Hansen; Brent L. Vossler; Brian A. Osborne; Brian Moskal; Brigitte Lovell; Byran M. Sullivan; Carlos Mejia; Carol Boyd; Catherine Eileen Ferro; Christine Steiner; Christopher Danch; Christopher Guillen; Christopher Pisano; Claire Brian; Claude R. Baggerly; Cristian Arrieta; Dale Givner; Daniel Cooper; Daniel S. Roberts; David A. Ossentjuk; David Bishop and Sophie Lorie; David L. Osias; David R. Greifinger; David R. Krause-Leemon; Dennis Corte; Dennis Mitchell; Douglas J. Dennington; Ed Casey; Elsa Sham; Eric Katz; Ernest J. Guadiana; George Bressler; Gerrold and Karen Grigsby; Gina Angiolillo; Glenn Bator; Gregg S. Garrison; Gregory Patterson; Harry and Raymond Sims; Harry Anthony Williams; Heather Blair; Henry D. Finkelstein; Holly Jacobson; J. Roger Essick; Jaide Whitman; James A. Vickman; Janice Hillestad; Jason Canger; Jason Goldman; Jeanne Zolezzi; Jeffrey Oderman; Jennifer Carafelli; Jennifer Jordan Day; Jennifer T. Buckman; Jeremy Jungreis; Jesse Hillestad; John E. Peakes, Jr.; Joseph Chrisman; Joshua Beckman; Joyce L. Heath; Joyce Syme; Julia J. Park; Julia Taft-Whitman; Julia Whitman; Julie A. Baker; Justin Fisch; Justin M. Alvarez; Karen A. Feld; Kathleen Janetatos Smith; Kelley M. Rasmussen; Kelsey Klein; Kelton Lee Gibson; Kelton Lee Gibson; Kristi Schoeld and Neil Jorgensen; L. Fraley; Laura Schreiner, a.k.a Laura Rearwin; Lawrence S. Mihalas; Leslie L. Clark; Linda J.G. MacDougall; Lindsay Nielson; Lindy Goetz; Loa E. Bliss; Malinda K. Vaughn and Mitchell B. Vaughn; Marc Melnick; Mark Pachowicz; Martin Hartmann; Matthew Bullock; Melinda Haas; Mellanie Hilgers; Michael Van Zandt; Michael W. Price; Michaela Boehm; Michelle J. Berner; Miles P. Hogan (mhogan@cityofventura.ca.gov); Nancy J. Johnson; Nathan Metcalf; Neal Maguire; Noah Goldenkrasner; Oriana Marie Fedele; Patrick Loughman; Patrick Skahan; Paul J. Deneen; Paul R. Huff; Peter Duchesneau; Peter Goldenring; Rabindra Singh; Rebecca C. Collins; Rebecca D. Schwermer; Rebecca Tickell; Robert K. Cartin; Robert Kwong; Robert Kyle; Robert L. Smith; Robert Turnage; Robin Schwartzburd; Ronald W. Bowman; Ryan Blatz; Ryan Hiete; Salvatore Scarpato; Scott Slater; Sean Herman; Shawn Hagerty; Sigrid Waggenger; Sophie A Wenzlau; Stephanie Gustafson; Susan and Steven White; Susan Capper; Susan M. Glennon; Thomas Adams; Thomas Bunn; Thomas C. Collins, Jr.; Thomas E. Jeffry; Thomas G. Gehring; Thomas M. German; Tiernan Dolan; Tim Carey; Timothy Mahoney; Tom Maloney; Tony Francois; Tucker Wisdom-Stack; William E. Colborn, Jr.; William R. Thatcher; William Short; William Slaughter; William Tarantino; William Tarantino; William W. Carter; Ha.Chung@alston.com; Aletheia Gooden; Trevor Quirk; brandon@weldo.com; kitstolz@gmail.com; elmoreaw@gmail.com; Elianna Gomez; Marnie Prock; Elizabeth Balloue; Irene Islas

Subject: RE: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

Ms. Birchfield,

Thank you for your email. The City of Ventura team will respond directly to you regarding this inquiry.

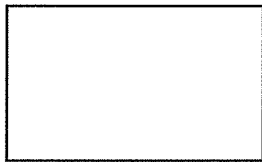
Mr. Quirk,

Regarding your latest email, I already responded directly to you, to Mr. Carey, and to Mr. Scarpato earlier today discussing your specific property interests and explaining why you are all properly named as cross-defendants in this case. Please confirm receipt of my email to you (as Mr. Carey has already done), or if you cannot locate that email, I would be happy to re-send it to you.

Other parties who have specific questions about their individual properties should email the team for the City of Ventura listed below, rather than needlessly replying to all and burdening this group with irrelevant information about individual property owners who are all properly in this case.

Shawn Hagerty Shawn.Hagerty@bbklaw.com
Christopher Pisano Christopher.Pisano@bbklaw.com
Sarah Foley Sarah.Foley@bbklaw.com
Patrick Skahan Patrick.Skahan@bbklaw.com
Marnie Prock Marnie.Prock@bbklaw.com
Elizabeth Balloue Elizabeth.Balloue@bbklaw.com
Irene Islas Irene.Islas@bbklaw.com

Thank you,
Sarah



Sarah Christopher Foley
Partner
sarah.foley@bbklaw.com
T: (213) 787-2560 C: (213) 435-8603
www.BBKlaw.com ☐ ☐

From: Stacey Birchfield <stacey.birchfield@gmail.com>
Sent: Friday, February 4, 2022 5:16 PM
To: Irene Islas <Irene.Islas@bbklaw.com>
Cc: Adam C. Kear <ackear@gmail.com>; Adam D. Wieder <awieder@grovemanhiete.com>; Alberto Boada <alberto.boada@ventura.org>; Alessandro Lobba <alobba@gmail.com>; Amy Hueppe <amychueppe@gmail.com>; Andrew Brady <andrew.brady@us.dlapiper.com>; Andrew K. Whitman <sfreberg@scr-legal.com>; Andrew P. Byrne <Andy@byrnelaw-la.com>; Angela Small Booth <angie@angiesmall.org>; Anthonie M. Voogd <avoogd@stanfordalumni.org>; Barry C. Groveman <bgroveman@grovemanhiete.com>; Brad Brian <brad.brian@mto.com>; Bradley Herrema <bherrema@bhfs.com>; Brandon Hansen <brandon@welldo.com>; Brent L. Vossler <bvossler@kslaw.legal>; Brian A. Osborne <osbornelawyer@gmail.com>; Brian Moskal <bmoskal@greenbergglusker.com>; Brigitte Lovell <loveb9@gmail.com>; Byran M. Sullivan <bsullivan@earlysullivan.com>; Carlos Mejia <carlos.mejia@doj.ca.gov>; Carol Boyd <carol.boyd@doj.ca.gov>; Catherine Eileen Ferro <cepharoah@gmail.com>; Christine Steiner <csteiner@csteinerlaw.com>; Christopher Danch <chrisdanch@gmail.com>; Christopher Guillen <cguillen@bhfs.com>; Christopher Pisano <Christopher.Pisano@bbklaw.com>; Claire Brian <cbrian8587@gmail.com>; Claude R. Baggerly <russ.baggerly65@gmail.com>; Cristian Arrieta <Carrieta@lrmmmt.com>; Dale Givner <dalegivner@gmail.com>; Daniel Cooper <daniel@sycamore.law>; Daniel S. Roberts <droberts@colehuber.com>; David A. Ossentjuk <DOssentjuk@oandblawyers.com>; David Bishop and Sophie Lorie <frenchiephotos@yahoo.com>; David L. Osias <dosias@allenmatkins.com>; David R. Greifinger <tracklaw@me.com>; David R. Krause-Leemon <david@bk-llaw.com>; Dennis Corte <dwcorte@outlook.com>; Dennis Mitchell <amitc74383@aol.com>; Douglas J. Dennington <ddennington@rutan.com>; Ed Casey <ed.casey@alston.com>; Elsa Sham <esham@lagerlof.com>; Eric Katz <Eric.Katz@doj.ca.gov>; Ernest J. Guadiana <eguadiana@elkinskalt.com>; George Bressler <andybsail@gmail.com>; Gerrold and Karen Grigsby <grigsbyranch@gmail.com>; Gina Angiolillo <gina.angiolillo@alston.com>; Glenn Bator <denibator@aol.com>; Gregg S. Garrison <gsgarrison@garrisonlawcorp.com>; Gregory Patterson <g.patterson@musickpeeler.com>; Harry and Raymond Sims <1978simsfamilytrust@gmail.com>; Harry Anthony

Williams <awilliam@me.com>; Heather Blair <Hblair1946@gmail.com>; Henry D. Finkelstein <hfinkelstein@ggfirm.com>; Holly Jacobson <hjj@bkslawfirm.com>; J. Roger Essick <rogeressick@gmail.com>; Jaide Whitman <jaide.whitman@gmail.com>; James A. Vickman <jv@vickmanassociates.com>; Janice Hillestad <janicehillestad@icloud.com>; Jason Canger <jason.canger@ventura.org>; Jason Goldman <jgoldman@begroup.us>; Jeanne Zolezzi <jzolezzi@herumcrabtree.com>; Jeffrey Oderman <joderman@rutan.com>; Jennifer Carafelli <carafelli@gmail.com>; Jennifer Jordan Day <jenniferjordanday@gmail.com>; Jennifer T. Buckman <jtb@bkslawfirm.com>; Jeremy Jungreis <jjungreis@rutan.com>; Jesse Hillestad <jessehillestad@gmail.com>; John E. Peakes, Jr. <jpeakesjr@aol.com>; Joseph Chrisman <jchrisman@hathawaylawfirm.com>; Joshua Beckman <joshbfbp@gmail.com>; Joyce L. Heath <mamaheath55@gmail.com>; Joyce Syme <seaviewmotel@hotmail.com>; Julia J. Park <julia@tomgehring.com>; Julia Taft-Whitman <juliawhitman@gmail.com>; Julia Whitman <TaftGardensOffice@gmail.com>; Julie A. Baker <Jandjbaker2@gmail.com>; Justin Fisch <jfisch@mofo.com>; Justin M. Alvarez <jalvarez@alvarezfirm.com>; Karen A. Feld <kfeld@colehuber.com>; Kathleen Janetatos Smith <kathismith@sbcglobal.net>; Kelley M. Rasmussen <kelleyras@gmail.com>; Kelsey Klein <kelseyklein88@gmail.com>; Kelton Lee Gibson <kgibson878@gmail.com>; Kelton Lee Gibson <kgibson@mwglaw.com>; Kristi Schoeld and Neil Jorgensen <neilkristi@googlemail.com>; L. Fraley <lfraley@kslaw.legal>; Laura Schreiner, a.k.a Laura Rearwin <laura@rearwin.com>; Lawrence S. Mihalas <lmihalas@gmail.com>; Leslie L. Clark <leslie@nomadgal.com>; Linda J.G. MacDougall <speakerholistic@gmail.com>; Lindsay Nielson <nielsonlaw@aol.com>; Lindy Goetz <lindygoetz@roadrunner.com>; Loa E. Bliss <loabliss@hotmail.com>; Malinda K. Vaughn and Mitchell B. Vaughn <vaughnmb@aol.com>; Marc Melnick <Marc.melnick@doj.ca.gov>; Mark Pachowicz <mark@pglaw.law>; Martin Hartmann <earthbuilding@gmail.com>; Matthew Bullock <matthew.bullock@doj.ca.gov>; Melinda Haas <mlynnbooking@gmail.com>; Mellanie Hilgers <mellaniehilgers@gmail.com>; Michael Van Zandt <mvanzandt@hansonbridgett.com>; Michael W. Price <michael@nomadgal.com>; Michaela Boehm <Micboehm@me.com>; Michelle J. Berner <mberner@kslaw.legal>; Miles P. Hogan (mhogan@cityofventura.ca.gov) <mhogan@cityofventura.ca.gov>; Nancy J. Johnson <Nancy.Johnson@berliner.com>; Nathan Metcalf <nmetcalf@hansonbridgett.com>; Neal Maguire <nmaguire@fcoplaw.com>; Noah Goldenkrasner <Noah.GoldenKrasner@doj.ca.gov>; Oriana Marie Fedele <orianafedele@gmail.com>; Patrick Loughman <ploughman@lrmmt.com>; Patrick Skahan <Patrick.Skahan@bbklaw.com>; Paul J. Deneen <paul@carbide.com>; Paul R. Huff <phuff@hufffirm.com>; Peter Duchesneau <pduchesneau@manatt.com>; Peter Goldenring <peter@gopro-law.com>; Rabindra Singh <ED@kfa.org>; Rebecca C. Collins <tominojai@gmail.com>; Rebecca D. Schwermer <octoberbabies2@verizon.net>; Rebecca Tickell <rebecca@bigpictureranch.com>; Robert K. Cartin <bob.cartin@dvm.com>; Robert Kwong <rk Wong@atozlaw.com>; Robert Kyle <robertkyle61@gmail.com>; Robert L. Smith <treeranch@ymail.com>; Robert Turnage <Robert.turnage@sbcglobal.net>; Robin Schwartzburd <robin.schwartzburd@gmail.com>; Ronald W. Bowman <ron@l-binc.com>; Ryan Blatz <ryan@ryanblatzlaw.com>; Ryan Hiete <rhiete@grovemanhiete.com>; Salvatore Scarpato <salscarpato@att.net>; Scott Slater <sslater@bhfs.com>; Sean Herman <sherman@hansonbridgett.com>; Shawn Hagerty <Shawn.Hagerty@bbklaw.com>; Sigrid Waggener <swaggener@manatt.com>; Sophie A Wenzlau <sophie.wenzlau@doj.ca.gov>; Stephanie Gustafson <sgustafson@ovs.org>; Susan and Steven White <curranwhite1@hotmail.com>; Susan Capper <chelsue@aol.com>; Susan M. Glennon <theglennonnest@aol.com>; Thomas Adams <tom@adamsassoc.com>; Thomas Bunn <tombunn@lagerlof.com>; Thomas C. Collins, Jr. <collinst3@sbcglobal.net>; Thomas E. Jeffry <thomas.jeffry@arentfox.com>; Thomas G. Gehring <tom@tomgehring.com>; Thomas M. German <kittycatgirl214@gmail.com>; Tiernan Dolan <tdolan@hacityventura.org>; Tim Carey <tim@calvoterguide.com>; Timothy Mahoney <honedog@mac.com>; Tom Maloney <tom@ovlc.org>; Tony Francois <tfrancois@briscoelaw.net>; Tucker Wisdom-Stack <Tucker.Wisdom-Stack@dot.ca.gov>; William E. Colborn, Jr. <jake@colbornandassociates.com>; William R. Thatcher <thelostplanetairmen@yahoo.com>; William Short <billshortesq@me.com>; William Slaughter <slaughter@srllplaw.com>; William Tarantino <wtarantino@mofo.com>; William Tarantino <info@venturalandtrust.org>; William W. Carter <w.carter@musickeeler.com>; Ha.Chung@alston.com; asg@qlflaw.com; tmq@qlflaw.com; brandon@weldo.com; kitstolz@gmail.com; elmoreaw@gmail.com; eg@qlflaw.com; Marnie Prock <Marnie.Prock@bbklaw.com>; Sarah Foley <Sarah.Foley@bbklaw.com>; Elizabeth Balloue <Elizabeth.Balloue@bbklaw.com>

Subject: Re: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

CAUTION - EXTERNAL SENDER.

My address at 350 Old Grade Road is on neither of the maps as well. Please advise as to why I'm included in this lawsuit as well.

Stacey Birchfield

350 Old Grade Road

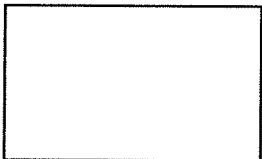
Oak View, CA 93022

On Thu, Feb 3, 2022 at 12:49 PM Irene Islas <Irene.Islas@bbklaw.com> wrote:

Good afternoon,

Attached please find the Notice of Entry of Order Establishing Watershed and Basin Boundaries.

Thank you,



Irene Islas
Legal Secretary
irene.islas@bbklaw.com
T: (925) 977-3312
www.BBKlaw.com ☐ ☐

This email and any files or attachments transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and immediately delete the email you received.

--

Stacey
805.340.0929

EXHIBIT 3

Trevor Quirk

From: Trevor Quirk
Sent: Friday, February 4, 2022 9:13 PM
To: Sarah Foley
Cc: Stacey Birchfield; Adam C. Kear; Adam D. Wieder; Alberto Boada; Alessandro Lobba; Amy Hueppe; Andrew Brady; Andrew K. Whitman; Andrew P. Byrne; Angela Small Booth; Anthonie M. Voogd; Barry C. Groveman; Brad Brian; Bradley Herrema; Brandon Hansen; Brent L. Vossler; Brian A. Osborne; Brian Moskal; Brigitte Lovell; Byran M. Sullivan; Carlos Mejia; Carol Boyd; Catherine Eileen Ferro; Christine Steiner; Christopher Danch; Christopher Guillen; Christopher Pisano; Claire Brian; Claude R. Baggerly; Cristian Arrieta; Dale Givner; Daniel Cooper; Daniel S. Roberts; David A. Ossentjuk; David Bishop and Sophie Lorie; David L. Osias; David R. Greifinger; David R. Krause-Leemon; Dennis Corte; Dennis Mitchell; Douglas J. Dennington; Ed Casey; Elsa Sham; Eric Katz; Ernest J. Guadiana; George Bressler; Gerrold and Karen Grigsby; Gina Angiolillo; Glenn Bator; Gregg S. Garrison; Gregory Patterson; Harry and Raymond Sims; Harry Anthony Williams; Heather Blair; Henry D. Finkelstein; Holly Jacobson; J. Roger Essick; Jaide Whitman; James A. Vickman; Janice Hillestad; Jason Canger; Jason Goldman; Jeanne Zolezzi; Jeffrey Oderman; Jennifer Carafelli; Jennifer Jordan Day; Jennifer T. Buckman; Jeremy Jungreis; Jesse Hillestad; John E. Peakes, Jr.; Joseph Chrisman; Joshua Beckman; Joyce L. Heath; Joyce Syme; Julia J. Park; Julia Taft-Whitman; Julia Whitman; Julie A. Baker; Justin Fisch; Justin M. Alvarez; Karen A. Feld; Kathleen Janetatos Smith; Kelley M. Rasmussen; Kelsey Klein; Kelton Lee Gibson; Kelton Lee Gibson; Kristi Schoeld and Neil Jorgensen; L. Fraley; Laura Schreiner, a.k.a Laura Rearwin; Lawrence S. Mihalas; Leslie L. Clark; Linda J.G. MacDougall; Lindsay Nielson; Lindy Goetz; Loa E. Bliss; Malinda K. Vaughn and Mitchell B. Vaughn; Marc Melnick; Mark Pachowicz; Martin Hartmann; Matthew Bullock; Melinda Haas; Mellanie Hilgers; Michael Van Zandt; Michael W. Price; Michaela Boehm; Michelle J. Berner; Miles P. Hogan (mhogan@cityofventura.ca.gov); Nancy J. Johnson; Nathan Metcalf; Neal Maguire; Noah Goldenkrasner; Oriana Marie Fedele; Patrick Loughman; Patrick Skahan; Paul J. Deneen; Paul R. Huff; Peter Duchesneau; Peter Goldenring; Rabindra Singh; Rebecca C. Collins; Rebecca D. Schwermer; Rebecca Tickell; Robert K. Cartin; Robert Kwong; Robert Kyle; Robert L. Smith; Robert Turnage; Robin Schwartzburd; Ronald W. Bowman; Ryan Blatz; Ryan Hiete; Salvatore Scarpato; Scott Slater; Sean Herman; Shawn Hagerty; Sigrid Waggener; Sophie A Wenzlau; Stephanie Gustafson; Susan and Steven White; Susan Capper; Susan M. Glennon; Thomas Adams; Thomas Bunn; Thomas C. Collins, Jr.; Thomas E. Jeffry; Thomas G. Gehring; Thomas M. German; Tiernan Dolan; Tim Carey; Timothy Mahoney; Tom Maloney; Tony Francois; Tucker Wisdom-Stack; William E. Colborn, Jr.; William R. Thatcher; William Short; William Slaughter; William Tarantino; William Tarantino; William W. Carter; Ha.Chung@alston.com; Aletheia Gooden; brandon@weldo.com; kitstolz@gmail.com; elmoreaw@gmail.com; Elianna Gomez; Marnie Prock; Elizabeth Balloue; Irene Islas

Subject: Re: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

Ms. Foley:

Contrary to what your email states, you have not “explained why we are all properly named cross defendants in this case.”

Your private email to me states “[t]he City of Ventura has identified your parcels, APNs 037-0-011-035, 037-0-012-220, addresses 11269/11271 SULPHUR MOUNTAIN R, as located adjacent to the Ventura River and/or one of its tributaries and thus you are properly named as a cross-defendant” is a conclusory statement that doesn’t explain anything.

What’s the point of the Judge’s Order defining the groundwater basin boundaries if, according to you, the City gets to decide who is a proper defendant and who is not? That's not the way it works.

You also know the City hasn't identified anything, including my parcels being “adjacent to the Ventura River” (it’s 15 miles away) and them being next to some imaginary tributary that doesn’t exist.

Speaking of not identifying anything, the ex-City Mayor, who voted to sue us and is ironically our County Supervisor, is on video at Matilija High School explaining to a packed auditorium that he didn't even know what he was voting for when BBK conned him and the rest of the Vta City Council into voting to sue its own people, including, he admitted, his own Dad. Have you seen the video? We are going to play it at trial, if we get that far.

Your firm decided who to sue and therefore needs to explain itself. That’s what CCP 128.7 requires. Your self-serving statement as trying to pass the decision and the sanctions that may flow from it onto your client -the City who doesn’t know anything-is offensive to me and probably a couple other taxpayers who are footing your firm's legal fees which were \$2,770,356.80 (that’s almost \$3M) *as of February 4, 2021-one year ago*.

If your firm chose to sue my wife and I, and it looks like a bunch of other folks whose properties are not in the Court defined groundwater basins, because our properties allegedly drain into the Ventura River (which is 15 miles from my house), then you need to say it and explain it, publicly.

Your statement below that other parties should email your "team" privately “rather than needlessly replying to all and burdening this group with irrelevant information about individual property owners who are all properly in this case” is an insidious attempt to muffle the people you chose to sue and prevent us from sharing information and collaborating to defeat this multimillion-dollar shakedown your firm instituted.

"Other parties" happen to be 80 yo retired folks on fixed incomes, teachers and non-lawyers who, unlike your special "team," aren't making \$500/hr+ to sue people, who now have to disclose your lawsuit to any potential buyers of their homes, who were served with this lawsuit in the privacy of their own home and may just find your emails and your lawsuit that was needlessly sprung on them "burdening."

We look forward to you explaining why and how property owners, like my wife and I, who are not in one of the 4 Court defined groundwater basins are proper parties to your lawsuit.

I don’t want to watch a Zoom meeting you are billing \$500/hr+ for and I’m not going to email your special team privately. If people don’t like my emails, they can block me.

Trevor

Sent From My Phone

On Feb 4, 2022, at 3:57 PM, Sarah Foley <Sarah.Foley@bbklaw.com> wrote:

Ms. Birchfield,

Thank you for your email. The City of Ventura team will respond directly to you regarding this inquiry.

Mr. Quirk,

Regarding your latest email, I already responded directly to you, to Mr. Carey, and to Mr. Scarpato earlier today discussing your specific property interests and explaining why you are all properly named as cross-defendants in this case. Please confirm receipt of my email to you (as Mr. Carey has already done), or if you cannot locate that email, I would be happy to re-send it to you.

Other parties who have specific questions about their individual properties should email the team for the City of Ventura listed below, rather than needlessly replying to all and burdening this group with irrelevant information about individual property owners who are all properly in this case.

Shawn Hagerty Shawn.Hagerty@bbklaw.com

Christopher Pisano Christopher.Pisano@bbklaw.com

Sarah Foley Sarah.Foley@bbklaw.com

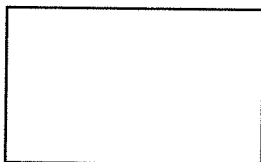
Patrick Skahan Patrick.Skahan@bbklaw.com

Marnie Prock Marnie.Prock@bbklaw.com

Elizabeth Balloue Elizabeth.Balloue@bbklaw.com

Irene Islas Irene.Islas@bbklaw.com

Thank you,
Sarah



Sarah Christopher Foley

Partner

sarah.foley@bbklaw.com

T: (213) 787-2560 C: (213) 435-8603

www.BBKlaw.com ☐ ☐

From: Stacey Birchfield <stacey.birchfield@gmail.com>

Sent: Friday, February 4, 2022 5:16 PM

To: Irene Islas <Irene.Islas@bbklaw.com>

Cc: Adam C. Kear <ackear@gmail.com>; Adam D. Wieder <awieder@grovesmanhiete.com>; Alberto Boada <alberto.boada@ventura.org>; Alessandro Lobba <alobba@gmail.com>; Amy Hueppe <amyhueppe@gmail.com>; Andrew Brady <andrew.brady@us.dlapiper.com>; Andrew K. Whitman <sfreberg@scr-legal.com>; Andrew P. Byrne <Andy@byrnelaw-la.com>; Angela Small Booth <angie@angiesmall.org>; Anthonie M. Voogd <avoogd@stanfordalumni.org>; Barry C. Groveman <bgroveman@grovesmanhiete.com>; Brad Brian <brad.brian@mto.com>; Bradley Herrema <bherrema@bhfs.com>; Brandon Hansen <brandon@welldo.com>; Brent L. Vossler

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 Daniel S. Roberts <drobotts@colehuber.com>; David A. Ossentjuk <DOssentjuk@oandblawyers.com>;
 David Bishop and Sophie Lorie <frenchiephotos@yahoo.com>; David L. Osias
 <dosias@allenmatkins.com>; David R. Greifinger <tracklaw@me.com>; David R. Krause-Leemon
 <david@bk-llaw.com>; Dennis Corte <dwcorte@outlook.com>; Dennis Mitchell
 <amitc74383@aol.com>; Douglas J. Dennington <ddennington@rutan.com>; Ed Casey
 <ed.casey@alston.com>; Elsa Sham <esham@lagerlof.com>; Eric Katz <Eric.Katz@doj.ca.gov>; Ernest J.
 Guadiana <eguadiana@elkinskalt.com>; George Bressler <andybsail@gmail.com>; Gerrold and Karen
 Grigsby <grigsbyranch@gmail.com>; Gina Angiolillo <gina.angiolillo@alston.com>; Glenn Bator
 <denibator@aol.com>; Gregg S. Garrison <gsgarrison@garrisonlawcorp.com>; Gregory Patterson
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 Anthony Williams <awilliam@me.com>; Heather Blair <Hblair1946@gmail.com>; Henry D. Finkelstein
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 <kfeld@colehuber.com>; Kathleen Janetatos Smith <kathismith@sbcglobal.net>; Kelley M. Rasmussen
 <kelleyras@gmail.com>; Kelsey Klein <kelseyklein88@gmail.com>; Kelton Lee Gibson
 <kgibson878@gmail.com>; Kelton Lee Gibson <kgibson@mwgjlaw.com>; Kristi Schoeld and Neil
 Jorgensen <neilkristi@googlemail.com>; L. Fraley <lfraley@kslaw.legal>; Laura Schreiner, a.k.a Laura
 Rearwin <laura@rearwin.com>; Lawrence S. Mihalas <lmihalas@gmail.com>; Leslie L. Clark
 <leslie@nomadgal.com>; Linda J.G. MacDougall <speakerholistic@gmail.com>; Lindsay Nielson
 <nielsonlaw@aol.com>; Lindy Goetz <lindygoetz@roadrunner.com>; Loa E. Bliss
 <loabliss@hotmail.com>; Malinda K. Vaughn and Mitchell B. Vaughn <vaughnmb@aol.com>; Marc
 Melnick <Marc.melnick@doj.ca.gov>; Mark Pachowicz <mark@pglaw.law>; Martin Hartmann
 <earthbuilding@gmail.com>; Matthew Bullock <matthew.bullock@doj.ca.gov>; Melinda Haas
 <mlynnbooking@gmail.com>; Mellanie Hilgers <mellaniehilgers@gmail.com>; Michael Van Zandt
 <mvanzandt@hansonbridgett.com>; Michael W. Price <michael@nomadgal.com>; Michaela Boehm
 <Micboehm@me.com>; Michelle J. Berner <mberner@kslaw.legal>; Miles P. Hogan
 <mhogan@cityofventura.ca.gov> <mhogan@cityofventura.ca.gov>; Nancy J. Johnson
 <Nancy.Johnson@berliner.com>; Nathan Metcalf <nmetcalf@hansonbridgett.com>; Neal Maguire
 <nmaguire@fcoplaw.com>; Noah GoldenKrasner <Noah.GoldenKrasner@doj.ca.gov>; Oriana Marie
 Fedele <orianafedele@gmail.com>; Patrick Loughman <ploughman@lrmmt.com>; Patrick Skahan
 <Patrick.Skahan@bbklaw.com>; Paul J. Deneen <paul@carbide.com>; Paul R. Huff
 <phuff@hufffirm.com>; Peter Duchesneau <pduchesneau@manatt.com>; Peter Goldenring
 <peter@gopro-law.com>; Rabindra Singh <ED@kfa.org>; Rebecca C. Collins <tominojai@gmail.com>;

Rebecca D. Schwermer <octoberbabies2@verizon.net>; Rebecca Tickell <rebecca@bigpictureranch.com>; Robert K. Cartin <bob.cartin@dvm.com>; Robert Kwong <rk Wong@atozlaw.com>; Robert Kyle <robertkyle61@gmail.com>; Robert L. Smith <treeranch@ymail.com>; Robert Turnage <Robert.turnage@sbcglobal.net>; Robin Schwartzburd <robin.schwartzburd@gmail.com>; Ronald W. Bowman <ron@l-binc.com>; Ryan Blatz <ryan@ryanblatzlaw.com>; Ryan Hiete <rhiete@grovemanhiete.com>; Salvatore Scarpato <salscarpato@att.net>; Scott Slater <sslater@bhfs.com>; Sean Herman <sherman@hansonbridgett.com>; Shawn Hagerty <Shawn.Hagerty@bbklaw.com>; Sigrid Waggener <swaggener@manatt.com>; Sophie A Wenzlau <sophie.wenzlau@doj.ca.gov>; Stephanie Gustafson <sgustafson@ovs.org>; Susan and Steven White <curranwhite1@hotmail.com>; Susan Capper <chelsue@aol.com>; Susan M. Glennon <theglennonest@aol.com>; Thomas Adams <tom@adamsassocs.com>; Thomas Bunn <tombunn@lagerlof.com>; Thomas C. Collins, Jr. <collinst3@sbcglobal.net>; Thomas E. Jeffry <thomas.jeffry@arentfox.com>; Thomas G. Gehring <tom@tomgehring.com>; Thomas M. German <kittycatgirl214@gmail.com>; Tiernan Dolan <tdolan@hacityventura.org>; Tim Carey <tim@calvoterguide.com>; Timothy Mahoney <honedog@mac.com>; Tom Maloney <tom@ovlc.org>; Tony Francois <tfrancois@briscoelaw.net>; Tucker Wisdom-Stack <Tucker.Wisdom-Stack@dot.ca.gov>; William E. Colborn, Jr. <jake@colbornandassociates.com>; William R. Thatcher <thelostplanetairmen@yahoo.com>; William Short <billshortesq@me.com>; William Slaughter <slaughter@srllplaw.com>; William Tarantino <wtarantino@mofo.com>; William Tarantino <info@venturalandtrust.org>; William W. Carter <w.carter@musickeeler.com>; Ha.Chung@alston.com; asg@qlflaw.com; tmq@qlflaw.com; brandon@weldo.com; kitstolz@gmail.com; elmoreaw@gmail.com; eg@qlflaw.com; Marnie Prock <Marnie.Prock@bbklaw.com>; Sarah Foley <Sarah.Foley@bbklaw.com>; Elizabeth Balloue <Elizabeth.Balloue@bbklaw.com>

Subject: Re: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Notice of Entry of Order Establishing Watershed and Basin Boundaries

CAUTION - EXTERNAL SENDER.

My address at 350 Old Grade Road is on neither of the maps as well. Please advise as to why I'm included in this lawsuit as well.

Stacey Birchfield

350 Old Grade Road

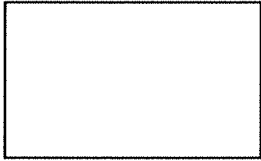
Oak View, CA 93022

On Thu, Feb 3, 2022 at 12:49 PM Irene Islas <Irene.Islas@bbklaw.com> wrote:

Good afternoon,

Attached please find the Notice of Entry of Order Establishing Watershed and Basin Boundaries.

Thank you,



Irene Islas
Legal Secretary
irene.islas@bbklaw.com
T: (925) 977-3312
www.BBKlaw.com ☐ ☐

This email and any files or attachments transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and immediately delete the email you received.

--

Stacey
805.340.0929

EXHIBIT 4

Trevor Quirk

From: Irene Islas <Irene.Islas@bbklaw.com>
Sent: Thursday, February 10, 2022 3:33 PM
To: 'Adam C. Kear'; 'Adam D. Wieder'; 'Alberto Boada'; 'Alessandro Lobba'; 'Amy Elmore'; 'Amy Hueppe'; 'Andrew Brady'; 'Andrew K. Whitman'; 'Andrew P. Byrne'; 'Angela Small Booth'; 'Anthonie M. Voogd'; 'Barry C. Groveman'; 'Brad Brian'; 'Bradley Herrema'; 'Brandon Hansen'; 'Brent L. Vossler'; 'Brian A. Osborne'; 'Brian Moskal'; 'Brigitte Lovell'; 'Byran M. Sullivan'; 'Carlos Mejia'; 'Carol Boyd'; 'Catherine Eileen Ferro'; 'Christine Steiner'; 'Christopher Danch'; 'Christopher Guillen'; 'Christopher Pisano'; 'Christopher Stolz'; 'Claire Brian'; 'Claude R. Baggerly'; 'Cristian Arrieta'; 'Dale Givner'; 'Daniel Cooper'; 'Daniel S. Roberts'; 'David A. Ossentjuk'; 'David Bishop and Sophie Lorie'; 'David L. Osias'; 'David R. Greifinger'; 'David R. Krause-Leemon'; 'Dennis Corte'; 'Dennis Mitchell'; 'Douglas J. Dennington'; 'Ed Casey'; 'Elsa Sham'; 'Eric Katz'; 'Ernest J. Guadiana'; 'George Bressler'; 'Gerrold and Karen Grigsby'; 'Gina Angiolillo'; 'Glenn Bator'; 'Gregg S. Garrison'; 'Gregory Patterson'; 'Harry and Raymond Sims'; 'Harry Anthony Williams'; 'Heather Blair'; 'Henry D. Finkelstein'; 'Holly Jacobson'; 'J. Roger Essick'; 'Jaide Whitman'; 'James A. Vickman'; 'Janice Hillestad'; 'Jason Canger'; 'Jason Goldman'; 'Jeanne Zolezzi'; 'Jeffrey Oderman'; 'Jennifer Carafelli'; 'Jennifer Jordan Day'; 'Jennifer T. Buckman'; 'Jeremy Jungreis'; 'Jesse Hillestad'; 'John E. Peakes, Jr.'; 'Joseph Chrisman'; 'Joshua Beckman'; 'Joyce L. Heath'; 'Joyce Syme'; 'Julia J. Park'; 'Julia Taft-Whitman'; 'Julia Whitman'; 'Julie A. Baker'; 'Justin Fisch'; 'Justin M. Alvarez'; 'Karen A. Feld'; 'Kathleen Janetatos Smith'; 'Kelley M. Rasmussen'; 'Kelsey Klein'; 'Kelton Lee Gibson'; 'Kelton Lee Gibson'; 'Kristi Schoeld and Neil Jorgensen'; 'L. Fraley'; 'Laura Schreiner, a.k.a Laura Rearwin'; 'Lawrence S. Mihalas'; 'Leslie L. Clark'; 'Linda J.G. MacDougall'; 'Lindsay Nielson'; 'Lindy Goetz'; 'Loa E. Bliss'; 'Malinda K. Vaughn and Mitchell B. Vaughn'; 'Marc Melnick'; 'Mark Pachowicz'; 'Martin Hartmann'; 'Matthew Bullock'; 'Melinda Haas'; 'Mellanie Hilgers'; 'Michael Van Zandt'; 'Michael W. Price'; 'Michaela Boehm'; 'Michelle J. Berner'; 'Miles P. Hogan (mhogan@cityofventura.ca.gov)'; 'Nancy J. Johnson'; 'Nathan Metcalf'; 'Neal Maguire'; 'Noah Goldenkrasner'; 'Oriana Marie Fedele'; 'Patrick Loughman'; 'Patrick Skahan'; 'Paul J. Deneen'; 'Paul R. Huff'; 'Peter Duchesneau'; 'Peter Goldenring'; 'Rabindra Singh'; 'Rebecca C. Collins'; 'Rebecca D. Schwermer'; 'Rebecca Tickell'; 'Robert K. Cartin'; 'Robert Kwong'; 'Robert Kyle'; 'Robert L. Smith'; 'Robert Turnage'; 'Robin Schwartzburd'; 'Ronald W. Bowman'; 'Ryan Blatz'; 'Ryan Hiete'; 'Salvatore Scarpato'; 'Scott Slater'; 'Sean Herman'; 'Shawn Hagerty'; 'Sigrid Waggener'; 'Sophie A Wenzlau'; 'Stacey Birchfield'; 'Stephanie Gustafson'; 'Susan and Steven White'; 'Susan Capper'; 'Susan M. Glennon'; 'Thomas Adams'; 'Thomas Bunn'; 'Thomas C. Collins, Jr.'; 'Thomas E. Jeffry'; 'Thomas G. Gehring'; 'Thomas M. German'; 'Tiernan Dolan'; 'Tim Carey'; 'Hogan, Miles'; 'Timothy Mahoney'; 'Tom Maloney'; 'Tony Francois'; 'Tucker Wisdom-Stack'; 'William E. Colborn, Jr.'; 'William R. Thatcher'; 'William Short'; 'William Slaughter'; 'William Tarantino'; 'William Tarantino'; 'William W. Carter'; 'Ha.Chung@alston.com'; 'Aletheia Gooden'; 'Trevor Quirk'; 'brandon@weldo.com'; 'kitstolz@gmail.com'; 'elmoreaw@gmail.com'; Elianna Gomez
Cc: Shawn Hagerty; Christopher Pisano; Patrick Skahan; Marnie Prock; Sarah Foley; Elizabeth Balloue
Subject: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Joint Trial Readiness Conference Statement
Attachments: 2022.02.10 Joint Trial Readiness Conference Statement-c1.pdf

Good afternoon,
Attached please find the Joint Trial Readiness Conference Statement in the above referenced case.
Thank you,




Irene Islas

Legal Secretary

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T: (925) 977-3312

www.BBKlaw.com 

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EXHIBIT 5

Trevor Quirk

From: Trevor Quirk
Sent: Thursday, February 10, 2022 4:30 PM
To: 'Irene Islas'; 'Adam C. Kear'; 'Adam D. Wieder'; 'Alberto Boada'; 'Alessandro Lobba'; 'Amy Elmore'; 'Amy Hueppe'; 'Andrew Brady'; 'Andrew K. Whitman'; 'Andrew P. Byrne'; 'Angela Small Booth'; 'Anthonie M. Voogd'; 'Barry C. Groveman'; 'Brad Brian'; 'Bradley Herrema'; 'Brandon Hansen'; 'Brent L. Vossler'; 'Brian A. Osborne'; 'Brian Moskal'; 'Brigitte Lovell'; 'Byran M. Sullivan'; 'Carlos Mejia'; 'Carol Boyd'; 'Catherine Eileen Ferro'; 'Christine Steiner'; 'Christopher Danch'; 'Christopher Guillen'; 'Christopher Pisano'; 'Christopher Stolz'; 'Claire Brian'; 'Claude R. Baggerly'; 'Cristian Arrieta'; 'Dale Givner'; 'Daniel Cooper'; 'Daniel S. Roberts'; 'David A. Ossentjuk'; 'David Bishop and Sophie Lorie'; 'David L. Osias'; 'David R. Greifinger'; 'David R. Krause-Leemon'; 'Dennis Corte'; 'Dennis Mitchell'; 'Douglas J. Dennington'; 'Ed Casey'; 'Elsa Sham'; 'Eric Katz'; 'Ernest J. Guadiana'; 'George Bressler'; 'Gerrold and Karen Grigsby'; 'Gina Angiolillo'; 'Glenn Bator'; 'Gregg S. Garrison'; 'Gregory Patterson'; 'Harry and Raymond Sims'; 'Harry Anthony Williams'; 'Heather Blair'; 'Henry D. Finkelstein'; 'Holly Jacobson'; 'J. Roger Essick'; 'Jaide Whitman'; 'James A. Vickman'; 'Janice Hillestad'; 'Jason Canger'; 'Jason Goldman'; 'Jeanne Zolezzi'; 'Jeffrey Oderman'; 'Jennifer Carafelli'; 'Jennifer Jordan Day'; 'Jennifer T. Buckman'; 'Jeremy Jungreis'; 'Jesse Hillestad'; 'John E. Peakes, Jr.'; 'Joseph Chrisman'; 'Joshua Beckman'; 'Joyce L. Heath'; 'Joyce Syme'; 'Julia J. Park'; 'Julia Taft-Whitman'; 'Julia Whitman'; 'Julie A. Baker'; 'Justin Fisch'; 'Justin M. Alvarez'; 'Karen A. Feld'; 'Kathleen Janetatos Smith'; 'Kelley M. Rasmussen'; 'Kelsey Klein'; 'Kelton Lee Gibson'; 'Kelton Lee Gibson'; 'Kristi Schoeld and Neil Jorgensen'; 'L. Fraley'; 'Laura Schreiner, a.k.a Laura Rearwin'; 'Lawrence S. Mihalas'; 'Leslie L. Clark'; 'Linda J.G. MacDougall'; 'Lindsay Nielson'; 'Lindy Goetz'; 'Loa E. Bliss'; 'Malinda K. Vaughn and Mitchell B. Vaughn'; 'Marc Melnick'; 'Mark Pachowicz'; 'Martin Hartmann'; 'Matthew Bullock'; 'Melinda Haas'; 'Mellanie Hilgers'; 'Michael Van Zandt'; 'Michael W. Price'; 'Michaela Boehm'; 'Michelle J. Berner'; 'Miles P. Hogan (mhogan@cityofventura.ca.gov)'; 'Nancy J. Johnson'; 'Nathan Metcalf'; 'Neal Maguire'; 'Noah Goldenkrasner'; 'Oriana Marie Fedele'; 'Patrick Loughman'; 'Patrick Skahan'; 'Paul J. Deneen'; 'Paul R. Huff'; 'Peter Duchesneau'; 'Peter Goldenring'; 'Rabindra Singh'; 'Rebecca C. Collins'; 'Rebecca D. Schwermer'; 'Rebecca Tickell'; 'Robert K. Cartin'; 'Robert Kwong'; 'Robert Kyle'; 'Robert L. Smith'; 'Robert Turnage'; 'Robin Schwartzburd'; 'Ronald W. Bowman'; 'Ryan Blatz'; 'Ryan Hiete'; 'Salvatore Scarpato'; 'Scott Slater'; 'Sean Herman'; 'Shawn Hagerty'; 'Sigrid Waggener'; 'Sophie A Wenzlau'; 'Stacey Birchfield'; 'Stephanie Gustafson'; 'Susan and Steven White'; 'Susan Capper'; 'Susan M. Glennon'; 'Thomas Adams'; 'Thomas Bunn'; 'Thomas C. Collins, Jr.'; 'Thomas E. Jeffry'; 'Thomas G. Gehring'; 'Thomas M. German'; 'Tiernan Dolan'; 'Tim Carey'; 'Hogan, Miles'; 'Timothy Mahoney'; 'Tom Maloney'; 'Tony Francois'; 'Tucker Wisdom-Stack'; 'William E. Colborn, Jr.'; 'William R. Thatcher'; 'William Short'; 'William Slaughter'; 'William Tarantino'; 'William Tarantino'; 'William W. Carter'; 'Ha.Chung@alston.com'; 'Aletheia Gooden'; 'brandon@weldo.com'; 'kitstolz@gmail.com'; 'elmoreaw@gmail.com'; Elianna Gomez
Cc: Shawn Hagerty; Christopher Pisano; Patrick Skahan; Marnie Prock; Sarah Foley; Elizabeth Balloue
Subject: RE: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Joint Trial Readiness Conference Statement

Vta City Counsel:

The Joint Trial Readiness document BBK prepared and just filed advises the Court BBK “addressed all comments received or identified areas of dispute.” That is not true.

JOINT TRIAL READINESS CONFERENCE STATEMENT

Defendant and Cross-Complainant City of San Buenaventura (City) submits the readiness conference statement (Statement) in advance of the trial readiness conference for February 14, 2022 at 1:30 p.m. On February 4, 2022, the City emailed a draft of the Statement to all parties who have appeared and invited input and joinder and subsequently addressed all comments received or identified areas of dispute. The Wood-Claeysens Foundation, Brian A. Osborne, Ronald W. Rood and Susan B. Rood, Trustees of The F Family Trust, Meiners Oaks Water District, Ventura River Water District, Aera Energy California Department of Parks and Wildlife, the State Water Resources Control Board, Rancho Matilija Mutual Water Company have joined this Statement, as reflected on this page.

I. MAP ISSUES

Pursuant to discussions at the January 20, 2022 hearing and the agreement of the

BBK's knows there is an issue of whether property owners, like my wife and I, who live outside one of the 4 court defined groundwater basins are property parties to this case. Contrary to BBK's representation, it has not "addressed (this) area of dispute."

BBK also failed to address why the Notice it served on my wife and I, and more than 10,000 other homeowners, said BBK was adjudicating a GROUNDWATER BASIN, but yet now claims it is adjudicating an entire “watershed.”

Page 2 of BBK's original Notice provides:

1 **NOTICE OF COMMENCEMENT OF**
2 **GROUNDWATER BASIN ADJUDICATION**

3
4
5 THIS NOTICE IS IMPORTANT. ANY RIGHTS YOU CLAIM TO PUMP
6 OR STORE GROUNDWATER FROM THE BASINS IDENTIFIED IN THIS
7 NOTICE MAY BE AFFECTED BY A LAWSUIT INITIATED BY THE THIRD
8 AMENDED CROSS-COMPLAINT SUMMARIZED BELOW

9
10 A duplicate copy of the Third Amended Cross-Complaint may be obtained by
11 contacting Cross-Complainant's attorney identified in this notice. If you claim rights
12 to pump or store groundwater within the basins identified herein, either now or in the
13 future, you may become a party to this lawsuit by filing an answer to the lawsuit on or
14 before the deadline specified in this notice. You may file an answer by completing the
15 attached Form Answer, filing it with the court indicated in this notice, and sending a
16 copy of the Form Answer to the Cross-Complainant's attorney identified below in this
17 notice.

18
19 Failing to participate in this lawsuit could have a significant adverse effect on
20 any right to pump or store groundwater that you may have. Specifically, a judgment
21 may be entered that prevents any person now or in the future, who owns your land
22 from ever pumping, extracting or storing groundwater from, under or on your land.

23
24 You may seek the advice of an attorney in relation to this lawsuit. Such
25 attorney should be consulted promptly. A case management conference ("CMC") in
26 this groundwater basin adjudication proceeding is currently scheduled to occur on the
27 date specified on the cover page of this notice. If you intend to participate in the
28 groundwater adjudication proceeding to which this notice applies, you are advised to

12-79-00018-12-09/01/01-1
- 2 -
Notice of Commencement of Groundwater Basin and Watershed Adjudication

Water law is found within the Code of Civil Procedure Section 830, et seq.

That law requires BBK identify "the name of the BASIN that is the subject of the comprehensive adjudication."

Here's the actual language and a link to the law:

CCP 836(a)(1)(B)(i):

(B) The following information shall be provided immediately following the text described in subparagraph (A):

(i) The name of the basin that is the subject of the comprehensive adjudication and a link to the Internet Web site address where the department has posted a map of the basin.

<https://codes.findlaw.com/ca/code-of-civil-procedure/ccp-sect-836.html>

BBK's Notice identified 4 groundwater basins. Here is page 3 of its Notice:

The following information is provided pursuant to Code of Civil Procedure section 836(a)(1)(B):

(i) Names of Basins:

- a. Upper Ventura River Groundwater Basin (Department of Water Resources' ("DWR") Bulletin 118 Groundwater Basin Number 4-3.01);
- b. Ojai Valley Groundwater Basin (DWR's Bulletin 118 Groundwater Basin Number 4-2);
- c. Lower Ventura River Groundwater Basin (DWR's Bulletin 118 Groundwater Basin Number 4-3.02); and
- d. Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118 Groundwater Basin Number 4-1)

(collectively "Ventura River Watershed Groundwater Basins").

BBK's Notice defined what it was adjudicating-the 4 basins.

BBK's Notice does not say it is adjudicating an entire "watershed" as it now claims. The bottom of the Notice refers to the 4 basins as the "Ventura River Watershed Groundwater Basins." That's what BBK has been paid millions of dollars to adjudicate, nothing more. BBK made up the broadened term "Ventura River Watershed" after homeowners who do not live within any of the 4 basins asked to be dismissed from BBK's adjudication. BBK failed to include this in its unilaterally crafted Joint Trial Readiness document.

Furthermore, and perhaps even more problematic, the above statute says that BBK had to name the basins "that are the subject of the **Comprehensive adjudication.**" (The name of the basin that is the subject of the comprehensive adjudication and a link to the Internet Web site address where the department has posted a map of the basin.) Comprehensive adjudication is defined as an "action filed in superior court to comprehensively determine rights to extract groundwater **in a basin.**"

rights.

(c) The other provisions of this code apply to procedures in a comprehensive adjudication to the extent they do not conflict with the provisions of this chapter.

831. Article 6 (commencing with Section 68630) of Chapter 2 of Title 8 of the Government Code applies to a comprehensive adjudication conducted pursuant to this chapter.

832. For purposes of this chapter, the following definitions apply:

(a) "Basin" has the same meaning as defined in Section 10721 of the Water Code.

(b) "Complaint" means a complaint filed in superior court to determine rights to extract groundwater and includes any cross-complaint that initiates a comprehensive adjudication.

(c) "Comprehensive adjudication" means an action filed in superior court to comprehensively determine rights to extract groundwater in a basin.

(d) "Condition of long-term overdraft" means the condition of a groundwater basin where the average annual amount of water extracted for a long-term period, generally supply of water to the basin, plus any temporary surplus. Overdraft during a period of drought is not sufficient to establish a condition of long-term overdraft if extractive reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods.

(e) "Department" means the Department of Water Resources.

(f) "Expert witness" means a witness qualified pursuant to Section 720 of the Evidence Code.

Below is a link to the law. Please click it. While you are there, hit control F on your keyboard and enter “watershed.” No results come up bc the word “watershed” does not even exist in the **groundwater basin** adjudication statutory scheme. BBK made the term up to include people like my wife and I in its lawsuit.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1390#:~:text=AB%201390%2C%20Alejo.-,Groundwater%3A%20comprehensive%20adjudication.,of%20which%20they%20are%20capable.&text=The%20bill%20would%20authorize%20a,a%20comprehensive%20adjudication%2C%20as%20specified.

As we’ve repeatedly pointed out to BBK, my wife and I, and many other folks who subsequently emailed you after you told me not to talk to them, do not own properties within any of the 4 basins BBK chose to adjudicate. I pointed that and the fact that you were improperly attempting to stop me from communicating with my neighbors who BBK conned the City into needlessly suing to you via e-mail on February 4th. For whatever reason, BBK chose not to respond to my February 4th e-mail.

In addition to falsely claiming BBK “addressed all comments,” BBK’s unilaterally drafted self-serving “joint statement of the case” falsely claims “[t]he City represents that it has responded to all inquiries from individual parties about these boundaries and maps.” BBK curiously added the phrase “represents that it has” to the second draft of your document, but failed to tell anyone.

Original:

addressed all comments received or identified areas of dispute. _____ joined this Statement, as reflected on the signature page.

I. MAP ISSUES

Pursuant to discussions at the January 20, 2022 hearing and the agreement of the City and the Garrison parties, on January 31, 2022, the City served a revised map showing the names of parties who have appeared and the locations of their parcels and/or claims to water rights. Per Mr. Garrison's additional request, the City has agreed to produce a list of all defaulted parties, identifying the defaulted party by name, APN, and basin/riparian status by February 14, 2022. Finally, the City served a notice of entry of the Court's Order establishing the Ventura River Watershed and groundwater basin boundaries. The City has responded to all inquiries from individual parties about these boundaries and maps. Some pro-per cross-defendants have asked the City to dismiss them from the case due to their property locations being outside the boundaries established in the Court's Order. The City has not agreed to dismiss these requesting cross-defendants.

II. PRE-TRIAL SCHEDULE

The parties are currently preparing for Phase 1 Trial and are completing the remaining tasks on the following pre-trial schedule ordered by the Court on January 26, 2022:

| DATE | EVENT |
|-------------------|---|
| February 7, 2022 | Upper Ojai Basin rebuttal expert disclosures are due. |
| February 10, 2022 | Joint Report for check-in trial readiness conference, organized by City of Ventura, is due. |

Filed document:

14 the Garrison parties, on January 31, 2022, the City served a revised map showing the names of
15 parties who have appeared and the locations of their parcels and/or claims to water rights. Per
16 Mr. Garrison's additional request, the City has agreed to produce a list of all defaulted parties
17 identifying the defaulted party by name, APN, and basin/riparian status by February 14, 2022
18 Finally, the City served a notice of entry of the Court's Order establishing the Ventura River
19 Watershed and groundwater basin boundaries. This caused certain Cross-Defendants to ask why
20 they were named in the lawsuit because they own property that is located within the Watershed
21 but that is not overlying one of the Watershed's groundwater Basins. The City represents that
22 has responded to all inquiries from individual parties about their particular parcels and their
23 location within the Watershed. Additionally, on February 7, 2022, the City sent an all-parties
24 email explaining that it named in its Third Amended Cross-Complaint all known riparian
25 landowners in the Watershed and that some but not all of these named riparian parties also own
26 parcels located within on the Watershed's groundwater basins, as defined by the Court's order.

27 II. PRE-TRIAL SCHEDULE

28 The parties are currently preparing for Phase 1 Trial and are completing the remaining

BBK probably changed the first draft from "the City has responded" to "the City represents it has responded" bc it knows the City has not responded to *anyone*. My friends on the City Council have no idea what's going on with BBK's water lawsuit, other than they are cutting million dollar checks. I'll fill them in. Second problem w your second highlighted "City represents is has responded" statement above- neither you nor anyone else from BBK responded to the email I sent to you (and everyone else) on February 4th at 9:12 p.m. and therefore your representation to the Court that the "City represents it has responded to all inquiries from individual parties" is false.

Submitting a false document to the Court is bad. Attorneys are not supposed to do it. There is a law against it. CCP 128.7(b) says that when a lawyer files a document with the Court he/she is certifying it is true and if it turns out not to be true, the lawyer can get sanctioned.

Filing frivolous lawsuits against thousands of people and making them needlessly spend time and money and causing them grief is bad too. The first line of my Feb 4th email that BBK chose not to respond to says: Contrary to what your email states, you have not "explained why we are all properly named cross defendants in this case."

Despite BBK's representations to the Court, BBK still has not explained why property owners who are not in one of the 4 Court defined groundwater basins are "properly named cross defendants"- factually or legally.

Facts matter. I, and a bunch of other lawyers and homeowners, just sat through two days of State expert depositions. We were lucky enough to be joined by a member of BBK's "team." We listened to the State's water experts (who made collectively more than \$500k, *to date*) testify over two days for more than 16 hours about a \$1.5M model they created and how pumping 1 gallon of water in the Upper Ojai basin reduces the Ventura River by .6 of a gallon (nobody on the planet other than a 500k expert, will believe that). But, guess what? The 500k experts admitted the \$1.5M model they created only applies to people w/in the 4 Basins- not us.

Lawyers are supposed to take the facts and then apply the law to them. The Judge, not BBK makes the ultimate call. As I said in my Feb 4th email that BBK chose to ignore, the "scope" of BBK's adjudication is defined by the Court, not BBK. Section 833 of the law limits the **scope** of BBK's adjudication to "basins" and only allowed BBK to sue people outside the Basins if the Judge says it's ok:

Article 2. Scope of Action

833 (c) If the court finds that including an interconnected surface water body or subterranean stream flowing through known and definite channels is necessary for the fair and effective determination of the groundwater rights in a basin, the court may require the joinder of persons who claim rights to divert and use water from that surface water body or subterranean stream in a comprehensive adjudication conducted pursuant to this chapter.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1390#:~:text=AB%201390%2C%20Alejo.-,Groundwater%3A%20comprehensive%20adjudication.,of%20which%20they%20are%20capable.&text=The%20bill%20would%20authorize%20a,a%20comprehensive%20adjudication%2C%20as%20specified

As BBK can plainly see, if it wanted to broaden its needless lawsuit to include the term it made up "the watershed" and to needlessly sue people like my wife and I who live outside the 4 court-defined basins, it needed to explain it to the Judge and get his permission to sue us and only then may a Court "require (our) joinder." BBK put the \$3M cart before the horse without explaining why (but I think we all know what's going on).

If, after hearing BBK's evidence (it has none-at least that you've told us about), the Judge found people outside of the 4 basins was/were necessary to the "fair and effective determination of the groundwater rights in a basin, the court may require the joinder." This has not occurred; people outside the basins should not have been sued; we should be immediately dismissed and BBK should start writing checks for homeowners, like me, who needlessly incurred attorney fees and costs and for the Ventura taxpayers it is ripping off.

If, as I suspect, BBK chooses not to dismiss us, we look forward to its “team” explaining why it unilaterally created a Joint Trial Readiness documents and certified it “addressed all comments” and “responded to all inquiries” when in fact it did not and, again, why and how property owners, like my wife and I, who are not in one of the 4 Court defined basins are proper parties to BBK’s lawsuit.

Trevor

Homeowner at 11269 Sulphur Mountain Road, Ojai, CA 93023

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Thank you.

From: Irene Islas <Irene.Islas@bbklaw.com>

Sent: Thursday, February 10, 2022 3:33 PM

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Subject: Santa Barbara Channelkeeper v. SWRCB, Case No. 19STCP01176- Joint Trial Readiness Conference Statement

Good afternoon,

Attached please find the Joint Trial Readiness Conference Statement in the above referenced case.

Thank you,



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