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2 Name of Owner/Cross-Defendant/Attorney

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12 Attorneys for Cross-Defendant, TICO MUTUAL WATER COMPANY

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES

15 SANTA BARBARA CHANNELKEEPER,
16 a California non-profit corporation,

17 Petitioner,

18 v.

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

21 Respondents.

22 CITY OF SAN BUENAVENTURA, etc.,

23 Cross-Complainant

24 v.

25 DUNCAN ABBOTT, an individual, et al.

26 Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

1 INITIAL DISCLOSURES – CODE OF CIVIL PROCEDURE SECTION 842(a)

2
3 1. The name, address, telephone number, and email address of the party and, if
4 applicable, the party's attorney.

5 (a) Name: Tico Mutual Water Company

6 (b) Address: 1790 S. Rice Road, Ojai, CA 93023-3806

7 (c) Phone Number: (805) 646-5996; (805) 397-9845

8 (d) Email Address: ffitting@sbcglobal.net

9 (e) Attorney (if applicable): Patrick T. Loughman

10
11 2. The quantity of any groundwater extracted from the basin by the party and the
12 method of measurement used by the party or the party's predecessor in interest for each of the
13 previous 10 years preceding the filing of the complaint.

14

15 Year	Amount of Groundwater Extracted:	Method of Extraction:
16 2019	352149 ft.3	Well pump
17 2018	435098 ft.3	Well pump
18 2017	400199 ft.3	Well pump
19 2016	208430 ft.3	Well pump
20 2015	479006 ft.3	Well pump
21 2014	512522 ft.3	Well pump
22 2013	817069 ft.3	Well pump
23 2012	817034 ft.3	Well pump

Year	Amount of Groundwater Extracted:	Method of Extraction:
2011	529491	Well pump
2010	missing records	Well pump

3. The type of water right or rights claimed by the party for the extraction of groundwater.

Water rights attendant to fee ownership of shareholders.

4. A general description of the purpose to which the groundwater has been put.

Provide potable water to residents in our district.

5. The location of each well or other source through which groundwater has been extracted.

APN 032-0-120-040

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6. The area in which the groundwater has been used.

Within our district's boundaries. APN 032-0-120-040.

7. Any claims for increased or future use of groundwater.

Not at this time.

8. The quantity of any beneficial use of any alternative water use that the party claims as its use of groundwater under any applicable law, including, but not limited to, Section 1005.1 , 1005.2 , or 1005.4 of the Water Code.

None.

9. Identification of all surface water rights and contracts that the party claims provides the basis for its water right claims in the comprehensive adjudication.

Not applicable.

1 10. The quantity of any replenishment of water to the basin that augmented the basin's
2 native water supply, resulting from the intentional storage of imported or non-native water in the
3 basin, managed recharge of surface water, or return flows resulting from the use of imported
4 water or non-native water on lands overlying the basin by the party, or the party's representative
5 or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Year	Quantity of replenishment of water
2019	None.
2018	None.
2017	None.
2016	None.
2015	None.
2014	None.
2013	None.
2012	None.
2011	None.
2010	None.

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11. The names, addresses, telephone numbers, and email addresses of all persons possessing information that supports the party's disclosures.


- (a) Name: Frances Fitting
- (b) Address: 1790 S. Rice Road, Ojai, CA 93023-3806
- (c) Phone Number: (805) 646-5996; (805) 397-9845
- (d) Email Address: ffitting@sbcglobal.net

- (a) Name: _____
- (b) Address: _____
- (c) Phone Number: _____
- (d) Email Address: _____

- (e) Name: _____
- (f) Address: _____
- (g) Phone Number: _____
- (h) Email Address: _____

12. Any other facts that tend to prove the party's claimed water right.
 None at this time. Cross Defendant reserves the right to amend/supplement this disclosure based on further discovery and research.

Dated: June 29, 2021



 SIGNATURE
 Frances Fitting (Secretary/Treasurer/WDO)
 [CROSS DEFENDANT NAME]
 for Tico Mutual Water Company

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VERIFICATION

I have read the foregoing INITIAL DISCLOSURE and know its contents.

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

I am treasurer and secretary of Tico Mutual Water Co., a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

I am one of the attorneys of record for _____, a party to this action. Such party is absent from the county in which I have my office, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

Executed at [CITY] Ojai, California on June 29, 2021.

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

Frances Fitting
[TYPE NAME HERE] Frances Fitting
Secretary/Treasurer/WDO
Tico Mutual Water Company