



1 Eric J. Schindler (SBN 141386)
 Email: *eschindler@kslaw.legal*
 2 Michelle J. Berner (SBN 270566)
 Email: *mberner@kslaw.legal*
 3 KroescheSchindler LLP
 2603 Main Street, Suite 200
 4 Irvine, California 92614
 Phone: 949-387-0495
 5 Fax: 888-588-0034

6 Attorneys for Cross-Defendant Oak Haven, LLC

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 8 **Superior Court Of the State of California**
 9 **County of Los Angeles**

11 Santa Barbara Channelkeeper, a
 12 California non-profit corporation

13 Petitioner

14 v.

15 State Water Resources Control Board,
 a California state agency; City of San
 16 Buena Ventura, a California municipal
 corporation, incorrectly named as City
 of Buena Ventura,

17 Respondents

Case No.: 19STCP01176

[Unlimited Jurisdiction]

Assigned for all Purposes to Judge William
 F. Highberger, Dept. C10

Complaint Filed: September 19, 2014

Trial Date: TBD

Initial Disclosures

19 City of San Buena Ventura, a California
 municipal corporation,

20 Cross-Complainant

21 v.

22 Duncan Abbott, an individual, et al.

23 Cross-Defendants





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Initial Disclosures – Code of Civil Procedure Section 842 (a)'

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

a). Name: Oak Haven, LLC; represented by:

Eric J. Schindler (SBN 141386)

Email: *eschindler@kslaw.legal*

Michelle J. Berner (SBN 270566)

Email: *mberner@kslaw.legal*

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b). The quantity of any groundwater extracted from the basin by the party and the method of measurement used by the party or the party's predecessor in interest for each of the previous ten (10) years preceding the filing of the complaint.

2. The quantity of water extracted in the last ten years and the method.

Year	Amount of Groundwater Extracted	Method of Extraction
2010-2020	Average of 2.5 acres per year	One well on property

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

Overlying water rights to produce and use groundwater.

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

Landscaping use.

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

3 One well with a depth of approximately 257 feet. It is identified as state well
4 number 04N23W03Q2.

5 6. The area in which the groundwater has been used.
6 Landscaping on the property.

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

8 No.

9 8. The quantity of any beneficial use of any alternative water use that the party
10 claims as its use of groundwater under any applicable law, including, but no limited to,
11 Section 105.1, 1005.2, or 1005.4 of the Water Code.

12 Not applicable.

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

15 Oak Haven maintains that it has overlying water rights.

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

22 N/A

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

25 Please see response to the first question.

26 12. Any other facts that tend to prove the party's claimed water right.

27 At this time, no other facts. However, discovery has not yet started and Oak
28 Haven reserves the right to amend this Response.

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Dated: June 1, 2021

KroescheSchindler LLP

By: *Lindley Fraley*
Eric J. Schindler
Michelle J. Berner, Lindley Fraley
Attorneys for Oak Haven, LLC

