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10 Attorneys for The Thacher School; Friend's Ranches, Inc.; Topa Topa Ranch & Nursery, LLC;
11 Finch Farms, LLC; Red Mountain Land & Farming, LLC; Thacher Creek Citrus, LLC; The Finch
12 Family Trust; James P. Finch; Robert Calder Davis, Jr.; Robert Calder Davis, Jr., TTEE of Trust
13 Owned Properties; Sharon H. Booth, Trustee of The Survivor's Trust Created Under Declaration
14 of Trust of Richard G. Booth and Sharon H. Booth Dated July 10,1980; David Robert Hamm and
15 Reeves Orchard, LLC (collectively, the "East Ojai Group")

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES**

18 SANTA BARBARA CHANNELKEEPER, a
19 California non-profit organization

20 **Petitioner,**

21 **vs.**

22 STATE WATER RESOURCES CONTROL
23 BOARD, a California State Agency; CITY OF
24 SAN BUENAVENTURA, a California
25 municipal corporation,

26 **Respondents.**

27 CITY OF SAN BUENAVENTURA, etc.,

28 **Cross-Complainant,**

DUNCAN ABBOTT, an individual, et al.,

Cross-Defendants.

CASE No. 19STCP01176

Judge: Hon. William F. Highberger

**DECLARATION OF ANTHONY BROWN
IN SUPPORT OF EAST OJAI' GROUP'S
EX-PARTE APPLICATION TO
CONTINUE TRIAL**

Action Filed: September 19, 2014

First Amended Complaint Filed:

September 7, 2018

Trial Date (Phase One): February 14, 2022

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DECLARATION OF ANTHONY BROWN

I, ANTHONY BROWN, declare as follows:

1. I am the Principal Hydrologist, Chief Executive Officer (CEO), and owner of Aquilogic, Inc. I am the designated expert on behalf of the parties identified as the East Ojai Group in this case. I have personal knowledge of the facts stated in this declaration and would testify to the following if called as a witness.

2. I have been tasked to provide expert witness testimony on behalf of the East Ojai Group and, in particular, to provide opinions on the inter-connectivity of groundwater and surface water in the Ojai Valley Groundwater Basin ("Ojai Basin") and, by extension, the hydrologic interconnectivity of the Ojai Basin to other basins and the surface watershed identified in this case.

3. It is extremely important that I and my team at Aquilogic have time to review the actual groundwater flow models developed by testifying experts for the City of Buenaventura ("City") and the California State Water Resources Control Board (SWRCB). In addition, the model developed by experts for the SWRCB was constructed considering a basin management model prepared by the Ojai Basin Groundwater Agency (OBGMA). Many thousands of hours over many months were likely expended by experts for the City and SWRCB to develop these models.

4. My review and analysis of these models is critical to enable me to provide competent and relevant testimony in this case and respond to testimony offered by experts for the City and SWRCB that relies upon these models. Review of such models is time consuming, costly, and complex. It is also important to review all models collectively at the same time.

5. Aquilogic did not receive the model developed by experts for the City until December 28th and could not start review of the models until January 3rd, 2022. I have my lead modeling professional, Dr. Robert Abrams, PG, CHG, doing this work. He has estimated that he needs to spend between 150 to 200 hours of time to review and evaluate the three models. Even with other project commitments, he is able to dedicate a significant amount of time in the coming weeks to this effort (e.g., 20-30 hours per week). Therefore, he needs approximately eight weeks to complete his review.

6. Once his review is completed, I will need additional time to confer with Dr. Abrams and counsel to prepare my testimony.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 13th day of January, 2022, at San Francisco, California.



ANTHONY BROWN