



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

In Pro. Per.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER,
A California non-profit corporation,
Petitioner/Plaintiff,

v.

STATE WATER RESOURCES CONTROL
BOARD, a California State Agency,
CITY OF SAN BUENAVENTURA, a California
municipal corporation, incorrectly named as CITY
OF BUENA VENTURA,
Respondent/Defendant

) Case No. 19STCPO1176
)
) Judge: Honorable William F. Highberger
)
) INITIAL DISCLOSURES OF CLAUDE R.
) BAGGERLY AND PATRICIA E. BAGGERLY
)
) Date: June 1, 2021
) Time: 1:30 p.m.
)
) Action Filed: Sept. 19, 2014
) Trial Date: Not Set

CITY OF SAN BUENAVENTURA, a California
municipal corporation,
Cross-Complainant

v.

DUNCAN ABBOTT, as individual, et al.
Cross-Defendants

INITIAL DISCLOSURES OF CLAUDE R. BAGGERLY AND,
PATRICIA E. BAGGERLY

CCP Section 842. These required Initial Disclosures, according to Code of Civil Procedure Section 842, are being served on all parties in Case No. 19STCP01176, Santa Barbara Channelkeeper v. State Water Resources Control Board, City of San Buenaventura, Comprehensive Adjudication:

Section 842 (a) (1). Claude R. Baggerly and Patricia E. Baggerly, 119 South Poli Avenue, Ojai, CA 93023 – (805) 646-0767 (805) 766-7317.

Section 842 (a) (2). Quantity of Water Used from the Upper Ventura River Groundwater Basin. We have been customers of Meiners Oaks Water District for over forty-five years.

Section 842 (a) (3). Our water right is overlying the Upper Ventura River Groundwater Basin.

Section 842 (a) (4). The beneficial uses to which the water has been put are drinking water, sanitation and parcel irrigation.

Section 842 (a) (5). The area in which the water has been used is Assessor Parcel Number 017-0-131-310.

Section 842 (a) (6). A future water right claim would include groundwater extraction in the event a water production well is constructed. Groundwater storage is also included for future use.

Section 842 (a) (7). Future groundwater extraction and groundwater storage.

Section 842 (a) (8). N/A

1 Section 842 (a) (9). No surface water rights are claimed.

2
3 Section 842 (a) (10). N/A

4
5 Section 842 (a) (11). See Section (a) (1) above.

6
7 Section 842 (a) (12). The Cross-Defendants are owners of the property mentioned above. As overlying
8 property owners to a groundwater basin identified in Bulletin 118 of the State Department of Water
9 Resources, the property now retains the same rights as riparian landowners. See *City of Los Angeles v.*
10 *City of San Fernando* (1975) 54 Cal.App.3d 743 [126 Cal.Rptr. 851] for more information regarding
11 overlying groundwater rights.

12
13 Dated: May 28, 2021

Claude R. Baggerly

14 Cross-Defendant In Pro. Per.
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3 **VERIFICATION**
4

5 I, Claude R. Baggerly, am a party to this case as a Cross-Defendant along with my wife. We are
6 overlying property owners to the Upper Ventura River Groundwater Basin. I have read the foregoing
7 INITIAL DISCLOSURES and have personal knowledge of its contents. I am informed and believe that
8 the matters stated therein are true. On these grounds, I certify and declare under penalty of perjury under
9 the laws of the State of California that these Initial Disclosures are true and correct. This verification is
10 executed on June 1, 2021, at Ojai, California.
11

12
13
14 _____
15 Claude R. Baggerly
16 Cross-Defendant, In Pro. Per.
17
18
19
20
21
22
23
24
25
26
27
28