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Attorneys for Cross-Defendants City of Ojai

Exempt from Filing Fees  
 Gov. Code, § 6103

SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
 COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER,  
 a California non-profit corporation,

Petitioner,

v.

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

Respondents.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

**DECLARATION OF HOLLY J.  
 JACOBSON ISO MOTION FOR  
 JUDGMENT ON THE PLEADINGS**

**Date: January 18, 2022**

**Time: 1:30 pm**

**Dept: 10**

**310 North Spring Street  
 Los Angeles, CA 90012**

Action Filed: September 19, 2014

First Amended Complaint Filed:  
 September 7, 2018

CITY OF SAN BUENA VENTURA, a  
 California municipal corporation,

Cross-Complainant,

v.

DUNCAN ABBOTT;  
 AGR BREEDING, INC; et al.

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I, Holly J. Jacobson, declare:

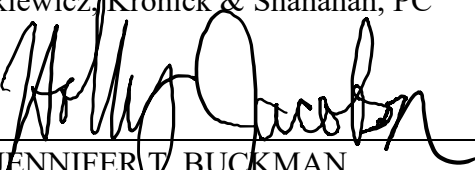
1. I am an attorney duly licensed to practice in the courts of the State of California. I am an attorney in this action for Cross Defendant, City of Ojai.

2. If sworn as a witness in the above-entitled action, I could and would competently testify to all the following facts of my own personal knowledge.

3. On December 15, 2021, I met and conferred with Shawn Hagerty, counsel for City of San Buenaventura, by telephone to try to determine if an agreement could be reached that resolved the issues raised in a possible motion for a judgment on the pleadings before filing that motion pursuant to Code of Civil Procedure section 439. I identified the specific allegations that I believe are subject to the judgment, namely, that the court lacked jurisdiction to adjudicate the Ojai basin, that Ventura had no standing to request the adjudication of the Ojai basin, and that Ventura could not state a claim against the Ojai basin for the remaining allegations. The conversation was professional and pleasant but Mr. Hagerty and I were unable to reach an agreement as to the claims raised by Ojai.

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

Dated: December 20, 2021

Respectfully submitted,  
Bartkiewicz, Kronick & Shanahan, PC  
By:   
JENNIFER T. BUCKMAN  
HOLLY J. JACOBSON  
Attorneys for CITY OF OJAI,