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David W. Slayton,
Executive Officer/Clerk of Court,
By M. Arellanes, Deputy Clerk

6 Attorneys for Cross-Defendant
CASITAS MUNICIPAL WATER DISTRICT, a California
7 special district

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES, DISTRICT

10 SANTA BARBARA CHANNELKEEPER, a
California non-profit corporation,

Case No. 19STCP01176

11 Petitioner,

Judge: Hon. William F. Highberger
Dept: 10

12 vs.

**CASITAS MUNICIPAL WATER DISTRICT
STATUS REPORT STATEMENT**

13 STATE WATER RESOURCES CONTROL
14 BOARD, et. al.,

Date: May 3, 2024
Time: 9:00 A.M.
Dept.: 10

15 Respondents.

16 CITY OF SAN BUENA VENTURA, et. al.,

Date Action Filed: September 19, 2014
Trial Date: Not Set

17 Cross-Complainant,

18 vs.

19 DUNCAN ABBOTT, an individual, et al.,

20 Cross-Defendants.
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1 Cross-Defendant Casitas Municipal Water District (“Casitas”) respectfully submits this
2 Statement, and supporting Declaration of Casitas’ General Manager Michael Flood, in support of
3 the Joint Statement filed by the City of Ventura in response to the Order to Show Cause issued by
4 the Court on March 13, 2024, which is set for hearing on May 3, 2024. Casitas urges the Court on
5 May 3 to overrule any objections that may be filed in opposition to the mediation parties’ request
6 to continue the existing stay until January 31, 2025.¹

7 The structured, and principal (e.g. elected official) led mediation is working. Parties that
8 used to be far apart and unwilling to talk with one another are rolling up their sleeves and bringing
9 data to bear in developing a watershed management plan and physical solution that will benefit *O*
10 *Mykiss* and other species of concern in the Ventura River Watershed (“VRW”), while at the same
11 time ensuring that Lake Casitas, and other regional water resources, continue to support the many
12 uses that allow human beings to inhabit, and make a living, in the VRW.

13 Through structured mediation, the Parties to the Cross-Complaint are making progress
14 towards the development of a physical solution and stipulated judgment for presentation to the
15 Court, and that process has greatly accelerated in the last two months. The Parties need more
16 time to finish the job, and there is no meaningful downside to allowing additional time until
17 January 31, 2025 to complete the mediation process. By January 31, 2025, the Parties will either
18 be able to agree to a physical solution that benefits *O Mykiss* or return to litigation.

19 There is good cause, therefore, to continue the stay—as jointly requested by the Mediation
20 Parties via the City of Ventura, whose Memorandum of Points and Authorities Casitas hereby
21 joins—to permit the structured mediation to continue through January 31, 2025. Setting a trial
22 date prematurely will only have the effect of diverting the Parties’ resources and attention away
23 from the mediation to prepare for a trial that nobody wants, that will not benefit *O Mykiss*, and
24 which will destroy the greatly improved relationships and collaborative momentum that has
25 resulted from the Mediation Parties working together collaboratively over the last two years.

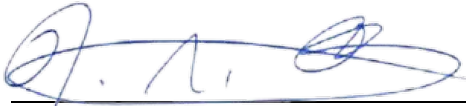
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27 ¹ In order to try and reach consensus on a shorter and more robust stay period for concluding the
28 ongoing mediation effort, Casitas concurred with the other mediation parties, which now include
the State, that an appropriate end date for the current stay be revised from March 31, 2025, to
January 31, 2025.

1 Casitas also supports the Court’s potential imposition of interim milestones as suggested by
2 Ventura during the requested stay in order to ensure that what is likely the last extension is put to
3 good use and the mediation parties remain diligent in their efforts to develop and submit a full and
4 robust physical solution for the Court’s consideration on or before January 31, 2025.

5 For the reasons stated herein, in the attached declaration of Michael Flood, attached hereto
6 and incorporated herein by reference, Casitas respectfully requests that the Court extend the stay
7 for all purposes to January 31, 2025 as requested for good cause by the City of Ventura, and that
8 the Court overrule any objections to the contrary.

9 Dated: April 26, 2024

RUTAN & TUCKER, LLP
JEREMY N. JUNGREIS
DOUGLAS J. DENNINGTON

11
12 By: 
13 _____
14 Jeremy N. Jungreis
15 Attorneys for Cross-Defendant
16 CASITAS MUNICIPAL WATER
17 DISTRICT, a California Special District
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PROOF OF SERVICE

Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
and related cross-action
Los Angeles County Superior Court
Case No. 19STCP01176

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed by the law office of Rutan & Tucker, LLP in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 18575 Jamboree Road, 9th Floor, Irvine, California 92612. My electronic notification address is mmartinez@rutan.com.

On April 26, 2024, I served on the interested parties in said action the within:

CASITAS MUNICIPAL WATER DISTRICT STATUS REPORT STATEMENT

as stated below:

(Via E-Service to **File & ServeXpress**) I affected electronic service by submitting an electronic version of the document(s) to **File & ServeXpress, LLC**, through the user interface at <https://secure.fileandservexpress.com>, which caused the document(s) to be sent by electronic transmission to the person(s) at the electronic service address(es) listed.

Executed on April 26, 2024, at Irvine, California.

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

Marisol Martinez

(Type or print name)

/s/ Marisol Martinez

(Signature)