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7 Principal, California Water Research

8 **BEFORE THE**  
9 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

10 HEARING REGARDING PETITION  
11 FILED BY THE DEPARTMENT OF  
12 WATER RESOURCES AND U.S. BUREAU  
13 OF RECLAMATION REQUESTING  
14 CHANGES IN WATER RIGHTS FOR THE  
15 CALIFORNIA WATERFIX PROJECT

16 MOTION FOR RECONSIDERATION OF  
17 HEARING RULING REGARDING EX  
18 PARTE MATTERS

19 California Water Research hereby moves that the Hearing Officers reconsider the  
20 February 6, 2018 ruling on Ex Parte matters. As described in the attached affidavit, there are  
21 major issues in the WaterFix hearing with knowing and willful concealment of evidence from  
22 discovery by the Department of Water Resources, including willful concealment of Ex Parte  
23 correspondence and documents shared with the WaterFix Hearing Team. To the extent that the  
24 Hearing Team counsel knew of the evidence and documents that were being concealed from  
25 discovery, it raises major issues of bias. These issues need to be resolved before the Hearing  
26 proceeds.

27 The WaterFix Hearing should not proceed with the subpoenaed Ex Parte documents still  
28 being concealed from discovery. California Water Research moves that the Hearing Officers  
rule on California Water Research's oral request on July 11, 2017 in the WaterFix hearing to

1 compel a legally adequate response to discovery. (The Hearing Chair ruled on July 11, 2017  
2 that she would take the request under consideration.) California Water Research also requests  
3 that the Hearing Officers consider any time limits on a motion to compel as tolled.

4 I. Legal argument

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6 Adjudicatory hearings before the State Water Resources Control Board are governed by  
7 the Water Code (Wat. Code, § 1075 et seq.) and Board regulations (Cal. Code Regs., tit. 23, §  
8 648 et seq.), which incorporate portions of the Administrative Procedure Act (Gov. Code, §  
9 11400 et seq., 11513) and the Civil Discovery Act (Code Civ. Proc., § 2016.010 et seq.).

10 The California Supreme Court has consistently held that "discovery statutes are to be  
11 construed broadly in favor of disclosure, so as to uphold the right to discovery whenever  
12 possible." (*Puerto v. Superior Court (The People)* (2008) 158 Cal.App.4th 1242, 1249 [citing  
13 *Emerson Electric Co. v. Superior Court (The People)* (1997) 16 Cal.4th 1101, 1107-1108;  
14 *Greyhound Corp. v. Superior Court (The People)* (1961) 56 Cal.2d 355, 377].)

15 Under the California Code of Civil Procedure section 2023.010, the following constitute  
16 misuses of discovery:

- 17 Subdivision (d), failing to respond or submit to an authorized method of discovery;
- 18 Subdivision (e), making, without substantial justification, an unmeritorious objection to  
discovery;
- 19 Subdivision (f), Making an evasive response to discovery.

20 California Water Research argues that the attached affidavit shows that counsel for the  
21 Department of Water Resources has done all of these things, and that it was partly in connection  
22 with Ex Parte communications with the Hearing Team during the hearing. This should *not* be  
23 condoned.

1 II. EVIDENCE OF CONCEALMENT

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3 As described by Michael Brodsky in his letter of December 28, 2017,<sup>1</sup> Ex Parte records  
4 have been sought under a Public Records Act request by Patrick Porgans since August 31, 2017.  
5 Mr. Brodsky also issued a Public Records Act request to the Department of Water Resources on  
6 January 12, 2017 for documents that were provided to State Water Resources Control Board  
7 Hearing Team members in Ex Parte reviews of modeling for the WaterFix hearing.<sup>2</sup>

8 However, as explained in the attached affidavit, the Ex Parte communications were  
9 included in specification of documents demanded on July 8, 2016 in a subpoena duces tecum for  
10 modeling information by the Pacific Coast Federation of Fishermen's Association (PCFFA) /  
11 Institute of Fisheries Resources (IFR.) Counsel for the California Department of Water  
12 Resources have knowingly and willfully concealed the documents for discovery for 18 months.

13 Dated February 7, 2018

13 Respectfully submitted,

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17 Deirdre Des Jardins  
18 Principal, California Water Research

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24 <sup>1</sup> Michael Brodsky's letter of December 28, 2017 is hereby incorporated as if set forth in full herein. Available at  
25 [https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/docs/2017/20171228\\_SCDA\\_PRA.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/docs/2017/20171228_SCDA_PRA.pdf)

26 <sup>2</sup> Michael Brodsky's Public Records Act Request to the California Department of Water Resources of January 12,  
27 2017, is hereby incorporated as if set forth in full herein.

1 AFFIDAVIT

2 I, Deirdre Des Jardins, do hereby declare:  
3

4           The Ex Parte information sought by protestants Save the California Delta Alliance and  
5 Sacramento County et. al. was subpoenaed by the Pacific Coast Federation of Fishermen’s  
6 Associations / Institute for Fisheries Resources from the Department of Water Resources on July  
7 6, 2016. The Hearing Officers have yet to even rule on a request to provide a more legally  
8 adequate response to the subpoena.

9  
10           As explained below, prior to Part 1 of the Hearing, I, Deirdre Des Jardins, principal at  
11 California Water Research, worked with the Pacific Coast Federation of Fishermen’s  
12 Associations (“PCFFA”) / Institute for Fisheries Resources (“IFR”) to subpoena correspondence  
13 and documents under the control of the Department of Water Resources, regarding specification  
14 and review of modeling for the WaterFix Hearing. This specification clearly included the  
15 Boundary 1 and Boundary 2 scenario submitted as foundational evidence by the Petitioners for  
16 Part 1A of the WaterFix hearing. The subpoena thus compelled disclosure of Ex Parte  
17 correspondence and documents shared with the Hearing Team regarding using the Boundary 2  
18 scenario for Part 1 of the Hearing.<sup>3</sup>

19           Counsel for Department of Water Resources refused to comply with the discovery  
20 request, and also placed extremely misleading statements about the adequacy of responses to the  
21 subpoena into the Hearing Record. The Hearing Officers and Hearing counsel, Dana Heinrich,  
22 also declined to rule on oral and written requests by California Water Research that DWR  
23 comply with discovery. Since DWR was not required to respond to discovery, the Ex Parte

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25 <sup>3</sup> Attachment 3 of Save the California Delta Alliance’s January 12, 2016 filing includes an email by John Gerlack to  
26 DWR’s counsel, Ken Bogdan, stating “Given the different statements that I’ve read, could you please clarify what  
modeling will be relied on for the case-in chief for each of the three phases of the hearing - 1A, 1B, and 2.” Clearly  
this was correspondence relating to “specification and review” of modeling for the WaterFix hearing.

1 correspondence and documents were not disclosed. Part 1 of the hearing closed, depriving  
2 protestants of the chance to put the information into the record. The Hearing Team counsel,  
3 Dana Heinrich, also made no statements, oral or written, indicating that there were documents  
4 being withheld from discovery by DWR, although clearly she had personal knowledge of the Ex  
5 Parte documents.

6 The Hearing Officers and Hearing Team counsel also declined to answer a letter by  
7 California Water Research to the Hearing Officers on May 3, 2017<sup>4</sup>, which requested  
8 information on the Board's proposed process for considering modeling by the Department of  
9 Water Resources for the Board, pursuant to Water code 85086. The letter referenced review by  
10 the Board outside of the Hearing, stating

11 California Water Research notes that the process of DWR providing the Board with  
12 scientific information and modeling outside of any hearing could violate English v. City  
13 of Long Beach (1950) 35 Cal.2d 157, if it was used to make a decision:

14 The Hearing Officers and Hearing Team counsel declined to answer the letter, and DWR is  
15 providing no testimony on DWR's modeling for the Board for Part 2.

16  
17 I. DISCOVERY REQUESTS RELATING TO EX PARTE CORRESPONDENCE

18 I, Deirdre Des Jardins, principal at California Water Research, sent a letter on May 8,  
19 2017 to the Department of Water Resources and the Hearing Officers, requesting production of  
20 subpoenaed documents that had not been disclosed.<sup>5</sup> Chief among the requests was a request for

21 <sup>4</sup> California Water Research's May 3, 2017 letter, *Request for clarification – Water Code § 85086 process*, is  
22 incorporated as if set forth in full herein. Available at  
[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/docs/2017/20170503\\_ddj\\_request.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/docs/2017/20170503_ddj_request.pdf)

23 <sup>5</sup> California Water Research's May 8, 2017 letter, Request to Department of Water Resources  
24 to provide modeling information previously requested and subpoenaed for the WaterFix hearing, is hereby  
25 incorporated as if set forth in full herein. Available at  
[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/docs/2017/20170508\\_ddj\\_request.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/docs/2017/20170508_ddj_request.pdf)

1 correspondence and documents regarding the Department of Water Resources’ modeling for the  
2 State Water Resources Control Board. The counsel for the Department of Water Resources,  
3 Robin McGinnis, responded by email on May 23, stating that all responsive documents had been  
4 produced. I then filed a formal request to DWR on July 10, 2017 to provide a statement of what  
5 documents were being withheld, and why.<sup>6</sup> The Department of Water Resources declined to  
6 respond.

7 At the Hearing on June 11, 2017, I requested that the Hearing Officer compel a more  
8 thorough response by the Department of Water Resources. Robin McGinnis repeated the  
9 misleading response that all responsive documents had been produced, knowingly and willfully  
10 concealing the correspondence and documents shared by the Department of Water Resources  
11 with the WaterFix Hearing team. The Hearing Chair, Tam Doduc, thanked Ms. McGinnis for  
12 putting the statement in the record. I then requested a legally adequate response to the  
13 subpoena, stating,

14 “There are specific requirements for responses to subpoenas, and they need to be clear  
15 enough to indicate what documents are being withheld and why. And this is too big. It's  
16 inadequate, incomplete and evasive as a response. It's not an interrogatory. It's requesting  
17 an adequate, complete and non-evasive response to the PCFFA via our subpoena.”

18 The Hearing Officers have yet to rule on the request.

## 19 II. DETAILED TIMELINE

### 20 A. History of subpoena

- 21 1. I requested on June 9, 2016 that the Hearing Officers require DWR and Reclamation to  
22 answer a list of questions about the Petitioners’ maintenance of supporting

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23 <sup>6</sup> California Water Research’s July 10, 2017 letter, Request to Department of Water Resources to clarify May 23,  
24 2017 responses to requests to produce information on CALSIM II modeling, is hereby incorporated as if set forth in  
25 full herein. Available at  
[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/docs/2017/20170710\\_ddj\\_request.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/docs/2017/20170710_ddj_request.pdf)

1 documentation, testing, and calibration information for Petitioner's CALSIM II  
2 modeling.<sup>7</sup> To the extent the supporting modeling information was not published, it was  
3 required to be submitted for the Hearing under the WaterFix Water Right Change Petition  
4 Hearing Notice of October 30, 2015, which stated,

5 "Exhibits based on technical studies or models shall be accompanied by sufficient  
6 information to clearly identify and explain the logic, assumptions, development, and  
7 operation of the studies or models."

8 And

9 "Exhibits that rely on unpublished technical documents will be excluded unless the  
10 unpublished technical documents are admitted as exhibits." (p. 34.)

- 11 2. Dana Heinrich, the counsel for the WaterFix Hearing Team, sent me an email on Monday,  
12 June 13, 2016, responding to the filing. The email stated,

13 I wanted to follow-up with you regarding your recent correspondence to the  
14 hearing officers regarding the WaterFix hearing. Due to time constraints, we were  
15 unable to respond to your June 9 letter in detail, and I wanted make sure your  
16 questions and concerns have been addressed, and potentially clear up some  
17 confusion regarding the hearing process.

18 I think it might be easier to communicate by phone rather than by email. Is there a  
19 good time for you? I'm in the office through Thursday this week, and I'm  
20 available most of the day tomorrow and Wednesday.

21 Please let me know. Thanks in advance.

22 Dana Heinrich  
23 Staff Attorney

24 I did contact Ms. Heinrich, who told me that the Board "does not have interrogatories"  
25 and sent me a blank, unsigned, unsealed subpoena form.

- 26 3. The Hearing Team counsel, Dana Heinrich also sent a letter to the Hearing parties on July  
27 5, 2016, stating that the Hearing Officers would not issue a subpoena at the request of a  
28 party. The letter stated,

Section 1985 does not establish a procedure whereby a court (or, by extension, an  
agency) must issue a subpoena directly to another party at the request of a party.  
Instead, section 1985, subdivision (c) specifies that the clerk, or a judge, shall  
issue a subpoena "signed and sealed but otherwise in blank to a party requesting  
it, who shall fill it in before service." In the alternative, an attorney of record in an

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<sup>7</sup> California Water Research's June 9, 2016 hearing filing is hereby incorporated as if set forth in full herein.

Available at

[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/docs/20160609\\_jardins\\_request.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/docs/20160609_jardins_request.pdf)

1 action or proceeding may sign and issue a subpoena or subpoena duces tecum .  
2 Consistent with these provisions, the State Water Board has developed a subpoena  
3 form for the use of parties in adjudicative proceedings before the Board. A copy  
4 of the form is attached for your convenience. I also provided a copy of this form  
5 to Ms. Deirdre Des Jardins of California Water Research on June 14, 2016.

6 California Water Research, as an unrepresented party, could not file a blank, unsigned,  
7 unsealed subpoena, nor sign an affidavit supporting a subpoena duces tecum.

- 8 4. I therefore worked with counsel for PCFFA/IFR to subpoena current documentation,  
9 testing, and calibration information for the CALSIM modeling. To the extent that the  
10 Hearing Officers refused to recognize California Water Research's requests for  
11 production requests in connection with PCFFA/IFR's subpoena, it has been wholly  
12 prejudicial.

13 B. Information related to review and specification of modeling

- 14 1. I specified production of "reports, analyses, presentations, correspondence, spreadsheets,  
15 notes, technical memoranda, and other information" related to review and specification of  
16 the modeling during various phases of the development of the WaterFix project,  
17 recognizing that specification and review processes were of potentially greater  
18 importance than the actual model runs.

19 The subpoena request included information relating to review and specification of the model  
20 runs for the WaterFix hearing and for the Biological Assessment, *including information that  
21 had not been publicly released.*

22 **Request #1**

23 Request Number 1: All reports, analyses, presentations, correspondence,  
24 spreadsheets, notes, technical memoranda, and other information relating to  
25 specification and review of the development of petitioners' CalSim II modeling for the  
26 Bay Delta Conservation Plan ("BDCP") and WaterFix, including but not limited to the  
27 following modeling phases:

- 28 a. Alternatives Screening, including the first and second screenings described  
in

Appendices 3A and 31 of the Draft Environmental Impact Report ("DEIR") /

Environmental Impact Statement ("DEIS"), particularly model runs relating to  
the Board's 2010 Flow Criteria and the Enhanced Spring Delta Outflow  
Approach initially recommended by the Board;

- b. Preliminary Administrative DEIR/DEIS;



- c. CS5 scenarios;
- d. DEIR/DEIS;
- e. Revised DEIR ("RDEIR") / Supplemental DEIS ("SDEIS");
- f. Biological Assessment; and
- g. WaterFix hearing.

On August 1, 2016 DWR filed a response to California Water Research's filings, which included DWR's objections to PCFFA/IFR's subpoena duces tecum.<sup>8</sup> The objections stated:

Response to Request Number 1: DWR objects to this request, because it is overbroad, seeks information duplicative of information already available through more convenient, less burdensome, and less expensive methods, and constitutes an undue burden and expense on DWR. Without waiving these objections, DWR provides the following responses. DWR produced responsive, non-privileged, non-duplicative documents in electronic format on July 20, 2016. (Id, p. 4 at 7-13.)

DWR's filing of August 1, 2016, clearly recognized California Water Research's involvement in PCFFA/IFR's subpoena, and responded to the subpoena as if California Water Research was also a party.

To the extent that Ex Parte correspondence between DWR's counsel and the Hearing Team regarding the modeling was concealed from discovery, it was not privileged, because the State Water Resources Control Board is not a client of DWR. Nor was it available by any other methods.

C. Response to request for testing and calibration information

1. The Department of Water Resources refused to produce any current documentation, testing, or calibration information for the CALSIM II modeling submitted for the WaterFix hearing. The only documents produced were web links to inadequate testing and calibration information from 2006 and prior years. DWR's attorneys successfully argued during my cross-examination of DWR's modeling panel on

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<sup>8</sup> The California Department of Water Resources' August 1, 2016 hearing filing is hereby incorporated as if set forth in full herein. Available at [https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/docs/20160801\\_dwr\\_resp.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/docs/20160801_dwr_resp.pdf)

1 August 26, 2016 that the reports were not relevant to the 2016 model versions  
2 provided for the WaterFix Hearing, and so should be barred from use in cross-  
3 examination.

- 4 2. In cross-examination on the model's representation of the flow split at the Delta  
5 Cross Channel, DWR's counsel, James Mizell, stated that he was "unaware" that  
6 PCFFA/IFR had subpoenaed the recent testing and calibration information for that  
7 component. (Tr. August 26, 2016 260:5.) But Appendix B of DWR's August 1,  
8 2016 filing clearly showed that the information was subpoenaed:

9 7.f. version history, calibration and testing information, field data, and  
10 documentation of assumptions for interior Delta flow splits, including the  
11 Sacramento River to Sutter and Steamboat Sloughs, and the Delta Cross  
12 Channel and Georgiana Slough, the San Joaquin River to Old and Middle  
13 River, and flow through Three Mile Slough, as well as Delta Island  
14 consumptive use;  
15 (August 1, 2016 filing, Attachment B, 12: 8-13)

- 16 3. The Department of Water Resources also refused to produce *any* correspondence or  
17 documents relating to review or specification of the modeling for the WaterFix  
18 hearing or the Biological Assessment, stating that "responsive documents had been  
19 produced." It later became clear that this response was deliberately misleading, and  
20 wholly prejudicial to protestants that were legal users of water in the hearing.

21 D. Requests for response

- 22 1. I sent a letter to the Department of Water Resources and the Hearing Officers on May  
23 8, 2017<sup>9</sup>, which described how DWR had failed to respond to California Water  
24 Research's requests or PCFFA/IFR's subpoena. The letter explained that documents  
25 and correspondence relating to review and specification of the modeling was different  
26 than the modeling itself, and requested production of information in the subpoena.
- 27 2. Robin McGinnis responded with a private email stating that DWR had produced "all  
28 documents" responsive to California Water Research's requests. I forwarded Ms.

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<sup>9</sup> California Water Research's May 8, 2017 letter, *Request to Department of Water Resources to provide modeling information previously requested and subpoenaed for the WaterFix hearing*, previously cited.

1 McGinnis' email to the Hearing Officers, on July 10, 2017 requesting clarification of  
2 DWR's response.<sup>10</sup> The letter stated in part:

3 **Water Code § 85086 and Boundary 1 and Boundary 2**

4 California Water Research also requested information on the specification of  
5 CALSIM II model runs for the WaterFix hearing, and other modeling. This  
6 includes the sequence of CALSIM II models of operational scenarios that  
7 were produced by the BDCP parties and used for the First and Second  
8 Alternative Screenings in the EIR/EIS, and further modeling of operational  
9 scenarios to meet Water Code § 85086. The First and Second Alternative  
10 Screenings were documented in Appendix 3I and 3A of the Bay-Delta  
11 Conservation Plan Draft EIR/EIS (Exhibit SWRCB-4.), as well as their use by  
12 the State Water Resources Control Board for part of the analysis pursuant to  
13 Water Code § 85086. The requested information also included information  
14 related to the specification of Boundary 1 and Boundary 2 as scenarios for the  
15 WaterFix Hearing.

16 The Department of Water Resources responded only that "there were no  
17 further documents responsive to your requests." The response was  
18 inadequate, incomplete, and evasive, and it has since become clear that  
19 relevant documents were withheld.

20 California Water Research requests that the Department of Water Resources  
21 further clarify what reports, analyses, presentations, correspondence,  
22 spreadsheets, notes, technical memoranda relating to the First and Second  
23 Alternative Screenings and subsequent modeling of operational scenarios to  
24 meet Water Code § 85086 were withheld from discovery in response to the  
25 May 8, 2017 request, and the reasons they were withheld. (p. 3-4.)

26 The response by Robin McGinnis that DWR had produced "all documents responsive to  
27 my requests" was clearly evasive and concealed from discovery extensive Ex Parte  
28 contacts with the Hearing Team regarding modeling of operational scenarios to meet  
Water Code section 85086.

The Hearing counsel, Dana Heinrich, clearly should have recognized that the subpoena  
included records of Ex Parte correspondence with the Hearing Team.

3. At the Hearing on July 11, 2017, Robin McGinnis provided the following response  
for the Hearing Record, stating that she considered the request to be "an  
interrogatory."

25 MS. McGINNIS: Robin McGinnis with the

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<sup>10</sup> California Water Research's July 10, 2017 letter, *Request to Department of Water Resources to clarify May 23, 2017 responses to requests to produce information on CALSIM II modeling*, previously cited.

1 California Department of Water Resources. I'd just  
2 like to provide an oral response to the filing  
3 yesterday by the California Water Research. We don't  
4 plan -- DWR does not plan to prepare a written response  
5 to this request.  
6 I'll note that discovery in Board hearings is  
7 limited. Parties are required to produce documents  
8 pursuant to Water Code 1100 and Administrative  
9 Procedure Act Sections 11450.10 and -.20.  
10 California Water Research's filing yesterday  
11 was more like an interrogatory, which is not allowed in  
12 this Board hearing. And to the extent that it is a  
13 document request which DWR would be required to respond  
14 to, there are no additional responsive documents.  
15 CO-HEARING OFFICER DODUC: Thank you,  
16 Ms. McGinnis, for putting that in the record. We'll  
17 take that under consideration.  
(R.T. July 11, 2017, 25:25 -26:17)

10 The Hearing Officer requested that California Water Research respond:

11 18 Ms. Des Jardins?  
12 19 MS. DES JARDINS: There are specific  
13 20 requirements for responses to subpoenas, and they need  
14 21 to be clear enough to indicate what documents are being  
15 22 withheld and why. And this is too big. It's  
16 23 inadequate, incomplete and evasive as a response. It's  
17 24 not an interrogatory. It's requesting an adequate,  
18 25 complete and non-evasive response to the PCFFA via our  
19 1 subpoena.  
20 2 CO-HEARING OFFICER DODUC: Thank you. We will  
21 3 take that under consideration.  
(R.T. July 11, 2017, 26:19 -27:3)

18 The Hearing Officers and Hearing Team counsel are still "considering" the request.

19 I hereby declare that this is true and correct to the best of my knowledge. Executed on  
20 this 7<sup>th</sup> day of February 2018 in Santa Cruz, California.

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24 Deirdre Des Jardins  
25 Principal, California Water Research

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**STATEMENT OF SERVICE**

**CALIFORNIA WATERFIX PETITION HEARING  
Department of Water Resources and U.S. Bureau of Reclamation  
(Petitioners)**

I hereby certify that I have this day submitted to the State Water Resources Control Board and caused a true and correct copy of the following document(s):

**Motion for Reconsideration of Hearing Ruling  
regarding Ex Parte Matters**

to be served by Electronic Mail (email) upon the parties listed in the Current Service List for the California Water Fix Petition Hearing, dated January 24, 2018, posted by the State Water Resources Control Board at [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/service\\_list.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml)

*Note: In the event that any emails to any parties on the Current Service List are undeliverable, you must attempt to effectuate service using another method of service, if necessary, and submit another statement of service that describes any changes to the date and method of service for those parties.*

I certify that the foregoing is true and correct and that this document was executed on February 8, 2018.

Signature:



Name: Deirdre Des Jardins  
Title: Principal, California Water Research

Party/Affiliation:  
Deirdre Des Jardins

Address:  
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Santa Cruz, California 95060