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BETHANY IRRIGATION DISTRICT

8  
9 BEFORE THE  
10 CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

11 ENFORCEMENT ACTION ENF01949  
DRAFT CEASE AND DESIST ORDER  
12 REGARDING UNAUTHORIZED  
DIVERSIONS OR THREATENED  
13 UNAUTHORIZED DIVERSIONS OF WATER  
FROM OLD RIVER IN SAN JOAQUIN  
14 COUNTY  
15 In the Matter of ENFORCEMENT ACTION  
ENF01951 – ADMINISTRATIVE CIVIL  
16 LIABILITY COMPLAINT REGARDING  
UNAUTHORIZED DIVERSION OF WATER  
17 FROM THE INTAKE CHANNEL TO THE  
BANKS PUMPING PLANT (FORMERLY  
18 ITALIAN SLOUGH) IN CONTRA COSTA  
COUNTY

SWRCB Enforcement Action  
ENF01951 and ENF01949  
BYRON-BETHANY IRRIGATION  
DISTRICT'S OPPOSITION TO THE  
DEPARTMENT OF WATER  
RESOURCES' MOTION FOR  
PROTECTIVE ORDER; RE: PAUL  
MARSHALL

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I. INTRODUCTION

The Department of Water Resources (DWR) submitted the testimony of Paul Marshall (Marshall) on February 22, 2016 under the guise of rebutting direct testimony of Byron-Bethany Irrigation District's (BBID) experts. However, the testimony submitted by Marshall is almost exclusively comprised of new testimony, including extensive technical analyses, having nothing to do with rebuttal. This untimely attempt to bring new direct testimony into the case with a new expert is a blatant violation of basic rules of procedure and the Hearing Officer's orders, as extensively argued in BBID's Motion in Limine, submitted February 29, 2016. Unless and until the State Water Resources Control Board (SWRCB) excludes Marshall from testifying, BBID must be allowed to conduct discovery on Marshall pursuant to its statutory discovery rights.

BBID immediately noticed Marshall's deposition after receipt of the new testimony. However, instead of simply producing its expert for a deposition in accordance with basic procedural rules, the Department of Water Resources (DWR) seeks a Protective Order to prevent BBID from exploring the substance and basis of Marshall's testimony in advance of the hearing. DWR complains about burden and expense and concludes that BBID should blindly cross-examine this witness during the formal hearing regardless of the prejudice to BBID's right to prepare for the hearing in advance by way of discovery it is entitled to perform.

Discovery is meant to be a liberal vehicle for finding evidence that may be helpful or harmful to a party's case in advance of the final adjudication. The idea that BBID's only opportunity to cross-examine this witness should be during the very limited amount of time permitted for cross-examination at the hearing itself is prejudicial, improper, and legally untenable. BBID respectfully requests the SWRCB prevent DWR's attempt to limit BBID's access to discoverable information in advance of the hearing and order that the Marshall deposition proceed as soon as possible and prior to the hearing.<sup>1</sup> BBID

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<sup>1</sup> BBID hereby joins in the "CDWA, SDWA, WSID Opposition to DWR Motion for Protective Order re Deposition of Paul Marshall; Supporting Declaration of Jennifer L. Spaletta" filed by Central Delta Water Agency.

1 alternatively requests that the hearing be continued by at least 30 days to allow sufficient  
2 time for the parties to complete this critical discovery.

3 II. STATEMENT OF FACTS

4 In July 2015, the SWRCB issued a Draft Cease and Desist Order to the West  
5 Side Irrigation District (WSID), Enforcement Action ENF01949 (CDO), and an  
6 Administrative Civil Liability Complaint to BBID, Enforcement Action ENF01951 (ACL).

7 On August 19, 2015, the Hearing Team issued a pre-hearing conference order  
8 stating, “[r]ebuttal evidence is limited to evidence that is responsive to evidence  
9 presented in connection with another party’s case-in-chief, and it does not include  
10 evidence that should have been presented during the case-in-chief of the party  
11 submitting rebuttal evidence.” (Declaration of Michael Vergara in Support of BBID’s  
12 Opposition to DWR’s Motion for Protective Order; Re: Paul Marshall (Vergara Decl.),  
13 Exh. A at p. 6, ¶ 9(c).)<sup>2</sup>

14 On September 2, 2015, DWR submitted a Notice of Intent to Appear (DWR NOI)  
15 listing Marshall as the only witness. (Vergara Decl., Exh. C.)

16 From October 2015 through late January 2016, a lengthy discussion ensued  
17 between the parties regarding the date for Marshall’s deposition. (Vergara Decl., Exh.  
18 D.) After many scheduling difficulties, the deposition was scheduled for December 30,  
19 2015. (*Ibid.*) However, counsel for DWR advised that Marshall could not appear on  
20 December 30, 2015 and the parties began to discuss January 2016 dates. (*Ibid.*) On  
21 January 19, 2016, DWR submitted an Amended Notice of Intent to Appear (DWR  
22 Amended NOI) in the BBID and WSID hearings, which removed Marshall as a witness.  
23 (Vergara Decl., Exh. E at pp. 1-3.) DWR did not add any expert witnesses. (*Ibid.*)  
24 Because DWR removed Marshall from the witness list, the parties agreed that they  
25 would not proceed with the Marshall deposition at that time. (Vergara Decl., Exh. D.)  
26 BBID never agreed to completely forego any future opportunity to depose Marshall.

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28 <sup>2</sup> The Hearing Team repeats this admonition in its Second Pre-Hearing Conference Order, dated  
February 18, 2016. (Vergara Decl., Exh. B at p. 3.)

1 (Ibid.)

2 On January 22, 2016, BBID filed expert witness testimony by Susan Paulsen  
3 (Paulsen) and WSID filed expert witness testimony by Thomas Burke (Burke). On  
4 February 22, 2016, DWR submitted Marshall's Rebuttal Testimony. (Vergara Decl.,  
5 Exh. F.) Marshall purports to rebut the Paulsen and Burke testimony. BBID filed a  
6 Motion in Limine to exclude Marshall's testimony and scheduled Marshall's deposition  
7 for March 3, 2016. (Vergara Decl., ¶ 9, Exh. G.) On February 29, 2016, DWR moved  
8 for a protective order prohibiting Marshall's deposition. (Vergara Decl., ¶ 10.)

9 The CDO and ACL Hearing are currently set to begin on March 21, 2016.

10 III. ARGUMENT

11 A. The Parties Are Entitled to Take Depositions

12 Administrative hearings and discovery procedures are governed by the Water  
13 Code (Wat. Code, § 1075 et seq.) and SWRCB regulations (Cal. Code Regs., tit. 23, §§  
14 648 et seq.), which incorporate portions of the Administrative Procedure Act (Gov. Code,  
15 § 11400 et seq., 11513) and the Civil Discovery Act (Code Civ. Proc., § 2016.010 et  
16 seq.). The Board or any party to a proceeding before the Board may take the deposition  
17 of witnesses in accordance with the Civil Discovery Act. (Wat. Code, § 1100.)

18 Discovery in the SWRCB's proceedings should, as in civil actions in the superior  
19 courts, be construed broadly in favor of permitting discovery. As courts have repeatedly  
20 explained, "[t]he scope of discovery [in civil actions] is very broad." (*Tien v. Superior*  
21 *Court* (2006) 139 Cal.App.4th 528, 535.) This expansive scope of discovery "enable[s] a  
22 party to obtain evidence in the control of his adversary in order to further the efficient,  
23 economical disposition of cases according to right and justice on the merits." (*Fairfield v.*  
24 *Superior Court* (1966) 246 Cal.App.2d 113, 119-120.) Consistent with this purpose, the  
25 California Supreme Court has consistently held that "discovery statutes are to be  
26 construed broadly in favor of disclosure, so as to uphold the right to discovery whenever  
27 possible." (*Puerto v. Superior Court* (2008) 158 Cal.App.4th 1242, 1249 [citing *Emerson*  
28 *Electric Co. v. Superior Court* (1997) 16 Cal.4th 1101, 1107-08; *Greyhound Corp. v.*

1 *Superior Court* (1961) 56 Cal.2d 355, 377].)

2 Further, parties to an adjudicative proceeding are entitled to due process, which  
3 includes a full and fair opportunity to participate. (See, e.g., *Sallas v. Municipal Court*  
4 (1978) 86 Cal.App.3d 737, 742 ["due process of law requires that an accused ... have a  
5 reasonable opportunity to prepare and present his defense .... "] BBID is seeking no  
6 more than it is afforded by the Water Code, the Code of Civil Procedure, and the basic  
7 tenets of due process rights.

8 B. DWR's Failure to Produce Marshall for Deposition in Advance of the Hearing Is  
9 Prejudicial, in Violation of Applicable Law and the Hearing Officer's Orders

10 DWR argues that the Hearing Officer and the parties did not propose to conduct  
11 discovery after all written testimony and exhibits were submitted. This argument,  
12 however, ignores the fact that the Hearing Officer and parties did not contemplate  
13 submission of expert testimony with new evidence supporting its case-in-chief during the  
14 rebuttal stage. This rule was made extremely clear in the Hearing Officer's orders –  
15 rebuttal was not to be used as a back door to introducing new case-in-chief testimony.  
16 (Vergara Decl., Exh. A at p. 6, ¶ 9(c), and Exh. B at p. 5 ["Rebuttal evidence is limited to  
17 evidence that is responsive to evidence presented in connection with another party's  
18 case-in-chief, and it does not include evidence that should have been presented during  
19 the case-in-chief of the party submitting rebuttal evidence."].) Code of Civil Procedure  
20 section 2034.310(b) supports this mandate by limiting the testimony of a late disclosed  
21 expert to "the falsity or non-existence of a fact used as the foundation for any opinion by  
22 any other party's expert witness, but may not include testimony that contradicts an  
23 opinion."

24 DWR waited until February 22, 2016, less than a month before the hearing, to  
25 submit complex expert testimony that should have been part of its case-in-chief. This  
26 conduct is unduly prejudicial to BBID's ability to meaningfully prepare its defense.  
27 Marshall was initially included as a case-in-chief witness in early September 2015.  
28 (Vergara Decl., Exh. C.) After months of back and forth to set his deposition, DWR

1 removed him as a witness. (Vergara Decl., Exh. E.) On the basis of DWR's decision not  
2 to utilize him as an expert, the parties opted not to proceed with his deposition in  
3 January 2016, without any waiver of their right to take the deposition. (Vergara Decl.,  
4 Exh. D.)

5 Now, although Marshall purports to rebut the direct testimony of experts Paulsen  
6 and Burke, his testimony extends far beyond a simple rebuttal by presenting new  
7 evidence outside the scope of Paulsen's and Burke's testimony. Marshall's expert  
8 testimony relies on complex technical models that employ large data sets to reach  
9 conclusions and opinions that DWR asserts are useful to the Hearing Officer in this  
10 proceeding. If DWR had timely disclosed the intention of Marshall to offer case-in-chief  
11 testimony, BBID would have immediately sought the data and model runs underlying the  
12 analyses and conducted depositions to prepare rebuttal. Now, it is improbable that BBID  
13 will be able to (1) timely obtain the data, assumptions, and modeling used and relied on  
14 by Marshall; (2) analyze the data, assumptions, modeling, and expert opinions; (3) take  
15 informed expert depositions; and (4) adequately prepare to rebut the expert testimony  
16 during the hearings.

17 BBID has the absolute right to depose Marshall under Code of Civil Procedure  
18 section 2034.410. Code of Civil Procedure, section 2034.410 provides "[o]n receipt of  
19 an expert witness list from a party, any other party may take the deposition of any  
20 person on the list." DWR is now presenting Marshall as an expert witness, and using his  
21 testimony as it intended to when Marshall was listed on the DWR NOI. DWR chose to  
22 remove Marshall from their NOI, and cannot now be permitted to introduce his case-in-  
23 chief expert testimony under the guise of rebuttal to the prejudice of BBID.

24 Thus, if Marshall's testimony is not excluded as untimely case-in-chief expert  
25 testimony, it must, at the very least, be subject to the same opportunities for discovery as  
26 every other case-in-chief witness. (Wat. Code, § 1100.)

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1 C. There is No Undue Burden or Expense in Producing Expert Witnesses and  
2 Documents Relied Upon Pursuant to Statutory Discovery Procedures

3 DWR repeatedly complains of the “undue” burden and expense of producing  
4 Marshall and the documents he relied upon in forming his opinions. Regardless of when  
5 Marshall is deposed, the burden and expense of producing a witness and documents is  
6 a normal cost of discovery. A party cannot try to protect their witness by producing their  
7 testimony and the documents they choose, then claiming the discovery process is too  
8 burdensome. Depositions cost money for all parties involved. Notably, the expense of  
9 Marshall’s deposition is not borne by DWR – it is borne by the parties taking the  
10 deposition who are required by law to pay Marshall at his normal hourly rate for his time.  
11 Presumably, DWR paid Marshall for the work performed on DWR’s behalf, thus taking  
12 on the burden and expense associated with expert retention. Having opted to take on  
13 the burden and expense of an expert, DWR cannot now assert that it is an “undue”  
14 burden and expense when the parties seek to discover the precise opinions the expert  
15 was hired to render. That is patently unfair, prejudicial, and legally untenable.

16 Additionally, DWR is required to show the “quantum of work required” to  
17 successfully assert an undue burden and expense defense to a deposition proceeding  
18 pursuant to code. (*West Pico Furniture Co. v. Superior Court* (1961) 56 Cal.2d 407, 417  
19 [“The objection based upon burden must be sustained by evidence showing the  
20 quantum of work required.”]) DWR merely makes the conclusory allegation that  
21 producing Marshall and the accompanying documents would be an “undue burden and  
22 expense to DWR” and fails to supply any facts demonstrating the quantum of work  
23 required to comply with BBID’s discovery requests. DWR’s conclusory allegations of  
24 undue burden and expense must fail.

25 DWR additionally argues that it should not have to bear the burden and expense of  
26 Marshall’s deposition and the accompanying production of documents so close to the  
27 hearing. Again, DWR conveniently ignores that the only reason Marshall’s deposition is  
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1 scheduled for March 2016 is because DWR chose to withdraw Marshall from its list of  
2 case-in-chief witnesses in January. The parties had no reason to proceed with the  
3 deposition earlier. Why would the parties opt to incur the burden and expense of  
4 deposing a person who was not going to testify at the hearing? It is disingenuous for  
5 DWR to attempt to block Marshall's deposition because of its proximity to the hearing  
6 when DWR created the problem. BBID is deposing Marshall as soon as practicable,  
7 considering DWR did not designate Marshall as a witness until February 22, 2016. DWR  
8 has options that do not serve to prejudice BBID: it can seek a continuance of the  
9 hearing or simply withdraw Marshall as a witness.

10 D. DWR's Relevance Objections Are Unfounded and Improper

11 DWR improperly claims the documents that BBID seek are irrelevant. To the  
12 contrary, Code of Civil Procedure section 2017.010 provides that "any party may obtain  
13 discovery regarding any matter, not privileged, that is relevant to the subject matter  
14 involved in the pending action[.]" In an administrative hearing, relevant evidence "is the  
15 sort of evidence on which responsible persons are accustomed to rely in the conduct of  
16 serious affairs." (Gov. Code, § 11513(c).) Although administrative adjudications follow a  
17 relaxed standard of admissibility, the evidence still "must be relevant and reliable."  
18 (*Aengst v. Bd. of Medical Quality Assurance* (1980) 110 Cal.App.3d 275, 283.)  
19 Additionally, pursuant to California Evidence Code section 350, no evidence is  
20 admissible unless it is relevant. (Evid. Code, § 350.) Relevant evidence is defined by  
21 California Evidence Code section 210 as "having any tendency in reason to prove or  
22 disprove any disputed fact that is of consequence to the determination of the action."  
23 (*People v. Kelly* (1992) 1 Cal.4th 495, 523; *People v. Haston* (1968) 69 Cal.2d 233, 245.)

24 BBID requests documents related to (1) the SWRCB's determination of water  
25 availability in the Sacramento and San Joaquin River Watersheds and the Delta for  
26 2015, (2) 2015 water right curtailments, (3) current and historical BBID diversions, and  
27 (4) documents relied upon by Marshall in forming his testimony and/or referring to his  
28 testimony. (Vergara Decl., Exh. G.) This enforcement action is about the SWRCB's

1 2015 water right curtailments based on its statewide and region-specific water availability  
2 analyses, which is in part informed by BBID's current and historical diversions.  
3 Certainly, the categories of documents have a tendency to prove or disprove disputed  
4 facts in this matter. Moreover, BBID is entitled to production of all documents relied  
5 upon by Marshall in forming his opinions. (Code Civ. Proc., § 2034.210(c).)

6 Further, the standard for production of documents at the discovery stage is  
7 whether the documents sought are likely to lead to the discovery of admissible evidence  
8 – not whether they are actually admissible at the hearing. (Code Civ. Proc.,  
9 § 2017.010.) It is improper to assert “relevance” as a justification for refusing to produce  
10 documents unless the categories sought are blatantly unrelated to the issues. That is  
11 not the case with BBID's document requests and DWR's refusal to produce documents  
12 that, at a minimum, are likely to lead to the discovery of admissible evidence is an abuse  
13 of the discovery process.

14 E. Marshall's Lack of Control or Possession of Some Documents Does Not Negate  
15 BBID's Right to Discovery

16 DWR claims that some of the documents sought by BBID are not within Marshall's  
17 possession or control. However, the Code of Civil Procedure allows for the discovery of  
18 documents in each *party's* possession or control, not limited to documents in a  
19 *deponent's* possession and control. (Code Civ. Proc., § 2031.010, subd. (a).) Marshall  
20 is a DWR employee and is being offered by DWR as its representative expert witness in  
21 this proceeding. This means that discovery encompasses DWR's documents, not just  
22 Marshall's. The fact that the deposition notice may seek documents that go beyond  
23 what is in his immediate possession and may instead be in the possession of other DWR  
24 representatives is not objectional. BBID is entitled to discover reports and writings  
25 created by the expert to prepare the expert's opinion (Code Civ. Proc., § 2034.210) and  
26 discovery that is admissible or “reasonably calculated to lead to the discovery of  
27 admissible evidence.” (Code Civ. Proc., § 2017.010.)  
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1 F. BBID is Not Required to Conduct its Pre-Hearing Expert Discovery During the  
2 Hearing Itself

3 DWR repeatedly argues that Marshall's deposition is unnecessary and duplicative  
4 because BBID will have the opportunity to cross-examine Marshall at the hearing. DWR  
5 claims that questioning Marshall through cross-examination would be more convenient,  
6 less burdensome, and less expensive than a deposition. DWR fails to mention that it  
7 would also be less effective and highly prejudicial.

8 Marshall's rebuttal testimony presents new evidence based on modeling  
9 simulations and conclusions deriving therefrom. BBID is entitled to gain an  
10 understanding of the basis for Marshall's opinions and documents in support of the same  
11 to be able to develop a proper cross-examination approach for purposes of the hearing.  
12 Going through this type of questioning takes time, which is conducive to the structure  
13 and process of depositions. The parties' time at the hearing is limited, such that it is  
14 unreasonable and prejudicial for BBID to use its limited time for a line of questioning that  
15 could occur before the hearing. Questioning Marshall at a deposition will allow BBID to  
16 conduct a more efficient and targeted cross-examination at the hearing, and will prevent  
17 spending limited hearing time on questioning that could have occurred weeks in  
18 advance.

19 G. The Proposed Discovery Does Not Expand the Scope of Marshall's Rebuttal  
20 Testimony or Scope of the Hearing

21 DWR claims that allowing BBID to depose Marshall will increase the likelihood of  
22 inappropriately expanding the scope of the hearing. As an example, DWR states that  
23 BBID intends to question Marshall beyond the bounds of his rebuttal testimony and on  
24 facts, opinions, or documents that relate to his testimony. The argument is nonsensical  
25 at best, given the fact that the entire purpose of an expert deposition is to garner all of  
26 the facts, opinions, or documents that an expert relied on, which necessarily includes  
27 testing that opinion with questions "related" to the testimony.

1 BBID, through its deposition notice, proposes to depose Marshall just as it would  
2 any other case-in-chief witness. BBID is allowed to discover evidence that is admissible  
3 or "reasonably calculated to lead to the discovery of admissible evidence." (Code Civ.  
4 Proc., § 2017.010.) BBID deposed many witnesses on topics including the witness'  
5 experience and job duties, water availability, water right curtailments, BBID's diversions,  
6 and preparation for the enforcement action. Marshall is no different. Moreover, DWR  
7 has the right to assert objections during the course of the deposition and certainly the  
8 Hearing Officer has the power to control the scope of testimony permitted during the  
9 hearing.

10 H. DWR's Alternative Request to Limit the Scope of Marshall's Deposition and  
11 Document Production is Unfounded

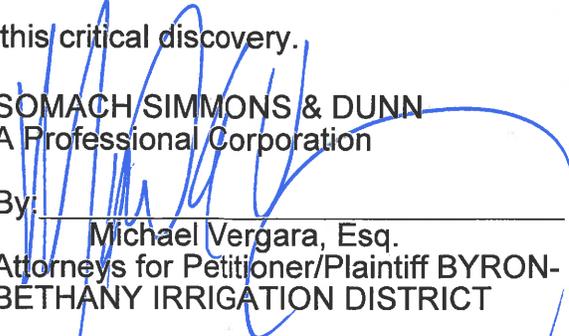
12 DWR's alternative request to limit the scope of Marshall's deposition and  
13 document production is unfounded and must be denied. BBID has a statutory right to  
14 "obtain discovery regarding any matter, not privileged, that is relevant to the subject  
15 matter involved in the pending action[.]" (*Ibid.*) For the reasons discussed herein above,  
16 DWR fails to set forth any facts or legal arguments to reasonably justify any curtailment  
17 of BBID's discovery rights. BBID is entitled to prepare its defense and as long as DWR  
18 intends to utilize Marshall to support the prosecution efforts against BBID, DWR and  
19 Marshall should not be shielded from any aspect of the discovery process.

20 VII. CONCLUSION

21 For the foregoing reasons, BBID respectfully requests the SWRCB deny DWR's  
22 Motion for Protective Order and allow the deposition of Marshall to proceed as noticed.  
23 BBID alternatively requests that the hearing be continued by at least 30 days to allow  
24 sufficient time for the parties to complete this critical discovery.

25 Dated: March 4, 2016

SOMACH SIMMONS & DUNN  
A Professional Corporation

By: 

Michael Vergara, Esq.  
Attorneys for Petitioner/Plaintiff BYRON-  
BETHANY IRRIGATION DISTRICT

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**PROOF OF SERVICE**

I am employed in the County of Sacramento; my business address is 500 Capitol Mall, Suite 1000, Sacramento, California; I am over the age of 18 years and not a party to the foregoing action.

On March 4, 2016, I served the following document(s):

BYRON-BETHANY IRRIGATION DISTRICT'S OPPOSITION TO THE DEPARTMENT OF WATER RESOURCES' MOTION FOR PROTECTIVE ORDER

X (via electronic mail) by causing to be delivered a true copy thereof to the person(s) and at the email addresses set forth below:

**SEE ATTACHED SERVICE LIST**

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 4, 2016 at Sacramento, California.

  
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Yolanda De La Cruz

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**SERVICE LIST OF PARTICIPANTS  
BYRON-BETHANY IRRIGATION DISTRICT  
ADMINISTRATIVE CIVIL LIABILITY HEARING**  
(Revised 9/2/15; Revised: 9/11/15)

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|---|--|
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**SERVICE LIST  
WEST SIDE IRRIGATION DISTRICT  
CEASE AND DESIST ORDER HEARING**

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|--|--|---|
| <p>1<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7</p> | <p>Division of Water Rights<br/>Prosecution Team<br/>Andrew Tauriainen, Attorney III<br/>SWRCB Office of Enforcement<br/>1001 I Street, 16th Floor<br/>Sacramento, CA 95814<br/><a href="mailto:andrew.tauriainen@waterboards.ca.gov">andrew.tauriainen@waterboards.ca.gov</a></p> | <p>The West Side Irrigation District<br/>Jeanne M. Zolezzi<br/>Karna Harringfeld<br/>Janelle Krattiger<br/>Herum\Crabtree\Suntag<br/>5757 Pacific Avenue, Suite 222<br/>Stockton, CA 95207<br/><a href="mailto:jzolezzi@herumcrabtree.com">jzolezzi@herumcrabtree.com</a><br/><a href="mailto:kharringfeld@herumcrabtree.com">kharringfeld@herumcrabtree.com</a><br/><a href="mailto:jkrattiger@herumcrabtree.com">jkrattiger@herumcrabtree.com</a></p> |
| <p>8<br/>9<br/>10<br/>11<br/>12<br/>13</p>   | <p>State Water Contractors<br/>Stefani Morris<br/>1121 L Street, Suite 1050<br/>Sacramento, CA 95814<br/><a href="mailto:smorris@swc.org">smorris@swc.org</a></p>  | <p>Westlands Water District<br/>Daniel O'Hanlon<br/>Rebecca Akroyd<br/>Kronick Moskovitz Tiedemann &amp; Girard<br/>400 Capitol Mall, 27<sup>th</sup> Floor<br/>Sacramento, CA 95814<br/><a href="mailto:dohanlon@kmtg.com">dohanlon@kmtg.com</a><br/><a href="mailto:rakroyd@kmtg.com">rakroyd@kmtg.com</a></p> <p>Phillip Williams of Westlands Water District<br/><a href="mailto:pwilliams@westlandswater.org">pwilliams@westlandswater.org</a></p> |
| <p>14<br/>15<br/>16<br/>17<br/>18<br/>19</p> | <p>South Delta Water Agency<br/>John Herrick<br/>Law Offices of John Herrick<br/>4255 Pacific Avenue, Suite 2<br/>Stockton, CA 95207<br/>Email: <a href="mailto:Jherrlaw@aol.com">Jherrlaw@aol.com</a></p>   | <p>Central Delta Water Agency<br/>Jennifer Spaletta Law PC<br/>P.O. Box 2660<br/>Lodi, CA 95241<br/><a href="mailto:jennifer@spalettalaw.com">jennifer@spalettalaw.com</a></p> <p>Dante Nomellini and Dante Nomellini, Jr.<br/>NOMELLINI, GRILLI &amp; MCDANIEL<br/><a href="mailto:ngmplcs@pacbell.net">ngmplcs@pacbell.net</a><br/><a href="mailto:dantejr@pacbell.net">dantejr@pacbell.net</a></p>   |
| <p>20<br/>21<br/>22<br/>23</p>               | <p>City and County of San Francisco<br/>Jonathan Knapp<br/>Office of the City Attorney<br/>1390 Market Street, Suite 418<br/>San Francisco, CA 94102<br/><a href="mailto:jonathan.knapp@sfgov.org">jonathan.knapp@sfgov.org</a></p>  | <p>San Joaquin Tributaries Authority<br/>Valerie C. Kincaid<br/>O'Laughlin &amp; Paris LLP<br/>2617 K Street, Suite 100<br/>Sacramento, CA 95816<br/><a href="mailto:vkincaid@olaughlinparis.com">vkincaid@olaughlinparis.com</a></p>   |
| <p>24<br/>25<br/>26</p>                      | <p>Byron-Bethany Irrigaton District<br/>Daniel Vergara<br/>Somach Simmons &amp; Dunn<br/>500 Capitol Mall, Suite 1000<br/>Sacramento, CA 95814<br/><a href="mailto:dVergara@somachlaw.com">dVergara@somachlaw.com</a></p>  | <p>California Department of Water Resources<br/>Robin McGinnis, Attorney<br/>P.O. Box 942836<br/>Sacramento, CA 94236-0001<br/><a href="mailto:robin.mcginnis@water.ca.gov">robin.mcginnis@water.ca.gov</a></p>   |

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