

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NOSSAMAN LLP  
FREDERIC A. FUDACZ (SBN 50546)  
ffudacz@nossaman.com  
GINA R. NICHOLLS (SBN 270174)  
gnicholls@nossaman.com  
777 S. Figueroa Street, 34th Floor  
Los Angeles, CA 90017  
Telephone: 213.612.7800  
Facsimile: 213.612.7801

**EXEMPT FROM FILING FEE  
PER GOV. CODE, § 6103**

Attorneys for CITY OF ONTARIO  
*[Additional Parties on Following Pages]*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO

CHINO BASIN MUNICIPAL WATER  
DISTRICT,  
  
Plaintiff,  
  
vs.  
  
CITY OF CHINO, ET AL.,  
  
Defendants.

Case No: RCVRS 51010  
  
*Assigned for All Purposes to:  
Honorable Gilbert G. Ochoa*

**DECLARATION OF COURTNEY JONES  
IN SUPPORT OF OPPOSITION TO  
APPROPRIATIVE POOL'S MOTION  
FOR AWARD OF EXPENSES**

[Concurrently Filed with Opposition; Request  
for Judicial Notice; Declaration of J. Scott-  
Coe; Declaration of G. Nicholls]

Date: August 22, 2024  
Time: 9:00 a.m.  
Place: Dept. R17

1 ARTHUR G. KIDMAN, CAL. BAR NO. 61719  
ANDREW B. GAGEN, CAL. BAR NO. 212257  
2 KIDMAN GAGEN LAW LLP  
8 Corporate Park, Suite 300  
3 Irvine, CA 92606  
Telephone: (714) 755-3100  
4 [agagen@kidmanlaw.com](mailto:agagen@kidmanlaw.com)

5 Attorneys for MONTE VISTA WATER DISTRICT and  
MONTE VISTA IRRIGATION COMPANY  
6

7  
8 JIMMY L. GUTIERREZ, CAL. BAR NO. 59448  
JIMMY L. GUTIERREZ LAW CORPORATION  
12616 Central Avenue  
9 Chino, CA 91710  
(909) 591-6336 Office  
10 [Jimmy@City-Attorney.com](mailto:Jimmy@City-Attorney.com)

11 Attorneys for CITY OF CHINO  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF COURTNEY JONES**

I, Courtney Jones, declare:

1. I am the Utilities Deputy General Manager for the City of Ontario (“Ontario”), a party in the above-captioned case. I have worked for Ontario for six years. I am a licensed Civil Engineer in California. In connection with my management role for Ontario, I closely follow and regularly participate in matters involving the Chino Basin Watermaster. I regularly attend Watermaster meetings, including meetings of the Appropriative Pool (“AP”) and the Advisory Committee. I am well-familiar with matters involving the Watermaster, including Watermaster’s annual budget process and assessment packages, and I personally review Watermaster’s assessment invoices issued to Ontario. I have personal knowledge of the matters set forth herein, unless stated upon information and belief, and if called as a witness, I could and would competently testify to the facts stated herein. As to any matters stated upon information and belief I am informed and believe they are true.

2. I make this declaration in support of the Opposition filed on behalf of Ontario to the Appropriative Pools’ Motion for Award of Expense, Including Expenses Under Civil Code Section 1717, filed June 26, 2024 (the “Motion”). I have reviewed the Motion and its supporting papers, and I am familiar with their contents.

3. After filing the Motion, the AP met in open session to discuss matters presented in the Motion and possible settlement. I personally attended the meeting on behalf of Ontario. Representatives of the City of Chino (“Chino”), Monte Vista Water District and Monte Vista Irrigation Company (collectively, “Monte Vista”) also attended. So far, Ontario has not reached a settlement with the AP, but Ontario remains interested in settlement.

4. Outside of the AP meeting, I have communicated with Chris Diggs, the AP Chairperson, and with John Schatz, AP legal counsel, as well as representatives of Chino and Monte Vista, in an effort to understand the amounts sought by the Motion and Ontario’s share. Based upon these communications and my own analysis, I understand that the AP is seeking \$262,761.21 for Ontario, Chino, and Monte Vista’s collective proportionate share of Watermaster assessments for

1 AP legal and administrative expenses, plus \$196,687.01 for attorney fees incurred by the AP in  
2 connection with the dispute about the legal effect of Terms of Agreement (“TOA”) entered into by  
3 the AP and the Overlying Agricultural Pool (“Ag Pool”) in 2022. The \$196,687.01 represents  
4 attorney fees paid by AP members other than the Responding Parties according to each AP  
5 member’s proportionate share of AP assessments for legal and administrative expenses. It includes  
6 attorney fees incurred on appeal directly by the AP, as well as attorney fees incurred on appeal by  
7 the Ag Pool and assessed to the AP under Section 5.4(a) of the Peace Agreement. The Motion seeks  
8 to shift the other AP members’ proportionate share of these attorney fees to the Responding Parties.

9 5. Certain amounts included in the Motion and its supporting papers already have been  
10 paid by Ontario. Specifically, the Memorandum of Costs on Appeal includes \$394,574.50 of  
11 attorney fees and costs allegedly incurred by legal counsel for the AP and the Ag Pool in connection  
12 with the TOA dispute, but Ontario already paid its share of the Ag Pool expenses. Paragraph 4 of  
13 the Declaration of Edgar Tellez in support of the Motion acknowledges that the Ag Pool’s attorney  
14 fees and costs already were apportioned and charged to the AP by Watermaster under Section 5.4(a)  
15 of the Peace Agreement. Mr. Tellez’s Declaration further acknowledges that the Ag Pool’s attorney  
16 fees and costs were paid proportionally by the AP members, including Ontario.

17 6. On information and belief, I understand that attorneys for the AP submit detailed  
18 invoices to the AP Chair for review before authorizing Watermaster to pay the amounts billed.

19 7. In the course of efforts to facilitate resolution of the dispute, Ontario and Monte Vista  
20 indicated that these entities would pay their share of the \$262,761.21 upon receipt of the detailed  
21 invoices that support these expenses.

22 8. Attached hereto as **Exhibit 1** is correspondence that I sent to the AP Chair and Vice  
23 Chair on June 20, 2024 confirming Ontario’s payment of Ag Pool legal and administrative expenses  
24 after receiving backup documentation from the AP.

25 9. Starting in March 2024, I personally requested copies of the AP’s detailed legal  
26 invoices from the current AP Chair, Mr. Diggs. Attached hereto as **Exhibit 2** are copies of my  
27 emails with Mr. Diggs about the invoices on March 27 and June 21, 2024. My emails explained  
28

1 that Ontario was seeking the invoices in order to complete its review of Ontario's outstanding share  
2 of expenses for Ag Pool legal, AP legal, and any other AP expenses. My emails also stated that  
3 representatives of Chino (Dave Crosley) and Monte Vista (Justin Scott-Coe) had made similar  
4 requests.

5 10. On July 19, 2024, I sent a formal request for the AP's detailed legal invoices to Mr.  
6 Diggs. A copy of my email to Mr. Diggs is attached hereto as Exhibit 3. On July 23, 2024, I  
7 emailed a similar request for AP legal invoices to the prior AP Chairperson, Eduardo Espinoza. A  
8 copy of my email to Mr. Espinoza is attached hereto as Exhibit 4.

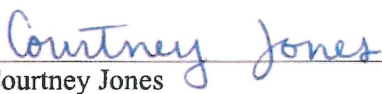
9 11. So far, I have not received any of the AP's detailed legal invoices in response to my  
10 requests.

11 12. As a show of good faith for purposes of resolving matters presented by the Motion,  
12 Ontario is ready and willing to pay its proportional share of the unpaid AP assessments for legal and  
13 administrative expenses into an escrow account with Watermaster, on similar terms and conditions  
14 as the escrow account that Watermaster established in 2020 for the AP in its dispute with the  
15 Agricultural Pool, in which the AP sought to review the Ag Pool's invoices for legal expenses.

16 13. On July 30, 2024, I personally communicated with the Watermaster seeking to  
17 establish an escrow account for the \$262,761.21 sought be the Motion for AP assessments for legal  
18 expenses. Attached as Exhibit 5 is a copy of my correspondence with the Watermaster. An escrow  
19 account has not been set up yet.

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

22 Executed this 1st day of August, at Ontario, California.

23  
24  
25   
26 Courtney Jones

# **EXHIBIT 1**

---

**From:** Courtney Jones <CJJones@ontarioca.gov>  
**Sent:** Thursday, June 20, 2024 6:34 PM  
**To:** Diggs, Chris; Chris Berch  
**Cc:** HJLee@cityofchino.org; jrobles@ci.upland.ca.us; jmswift@fontanawater.com; jbrokaw@marygoldmutualwater.com; jscottcoe@mvwd.org; jschatz13@cox.net; sreimer@mvwd.org; KevinK@cvwdwater.com; Ireya@JCSD.US; directormartinez@mvwd.org; mayala@jcsd.us; MarkG@cvwdwater.com; mwiley@chinohills.org; mmartin47@yahoo.com; mezvirbulis@sgvwater.com; navila@cityofchino.org; ndemoet@ci.upland.ca.us; omramos@sgvwater.com; randallr@cvwdwater.com; smanbahal@wvwd.org; Scott Burton; sjzielke@fontanawater.com; spopelar@jcsd.us; tayav@cvwdwater.com; TLayton@sawaterco.com; TobyMoore@gswater.com; amandac@cvwdwater.com; aalberti@sgvwater.com; benjamin.lewis@gswater.com; bgdecoud@mvwd.org; Blee@sawaterco.com; bsmith@jcsd.us; CarmenV@cvwdwater.com; cblais@ci.norco.ca.us; Chad Nishida; Melissa.Cansino@pomonaca.gov; cifealy@fontanawater.com; DCrosley@cityofchino.org; EduardoE@cvwdwater.com; EricG@cvwdwater.com; edtarango@fontanawater.com; eulloa@cityofchino.org; gkamansky@niagarawater.com; JamesC@cvwdwater.com; JimmieM@cvwdwater.com; JiwonS@cvwdwater.com; jchan@wvwd.org; JohnB@cvwdwater.com; jlopez@sarwc.com; customerservice@sarwc.com; Marsha Ariyasu; Ron Craig  
**Subject:** Ontario Payment of Ag Pool Legal  
**Attachments:** CityofOntario-AgPoolPaymentRCVRS51010.pdf

Good afternoon Appropriative Pool Chair and Vice Chair,

Please see the attached letter transmitted today with our payment of \$241,449.19 to Watermaster.

We appreciate the backup documentation provided on June 13th. This allowed us to expedite payment for the Overlying Agricultural Pool's legal administration and expenditures.

Thank you,  
Courtney

**Courtney Jones, P.E.**

Deputy General Manager



1425 S. Bon View Avenue  
Ontario, CA 91761-4406  
Phone: (909) 395-2640  
E-mail: [cjjones@ontarioca.gov](mailto:cjjones@ontarioca.gov)

CITY OF

303 EAST B STREET | ONTARIO, CALIFORNIA 91764



ONTARIO

(909) 395-2000 FAX (909) 395-2070 OntarioCA.gov

PAUL S. LEON  
MAYOR

DEBRA PORADA  
MAYOR PRO TEM

ALAN D. WAPNER  
JIM W. BOWMAN  
RUBEN VALENCIA  
COUNCIL MEMBERS

June 20, 2024

SHEILA MAUTZ  
CITY CLERK

JAMES R. MILHISER  
TREASURER

SCOTT OCHOA  
CITY MANAGER

## VIA EMAIL

Mr. Todd M. Corbin, General Manager  
Chino Basin Watermaster  
9641 San Bernardino Road  
Rancho Cucamonga, CA 91730  
Email: [tcorbin@cbwm.org](mailto:tcorbin@cbwm.org)

**Subject: City of Ontario Payment to Watermaster for Agricultural Pool Legal Expenses (Court Appeal Case No. E079052 and Super. Ct. No. RCVRS 51010)**

Dear Mr. Corbin,

The City of Ontario ("City") submits payment to Chino Basin Watermaster ("Watermaster") in the amount of **\$241,449.19** for the Overlying Agricultural Pool ("Ag Pool") legal administration and expenditures resulting from the San Bernardino County Court Appeal Case No. E079052, affirming the original order.

The City is paying the invoices below received for Fiscal Years 2021-2022 through 2023-2024 as they relate to the Ag Pool legal administration and expenditures. **The remaining Appropriate Pool special assessment invoices will be paid once the outstanding backup documentation has been received.**

- Settlement invoices received for FY 2021-2022 ("AP22-29-SET" and "AP22-42-STL");
- Legal expense invoices received for FY 2022-2023 ("AP22-61-AGL" and "AP23-57-AG");
- Legal expense invoice received for FY 2023-2024 ("AP24-13-AG").

The City appreciates Watermaster's ongoing efforts to provide the outstanding invoices for prompt payment. This payment is made in good faith, and without prejudice to any future payments.



Sincerely,

*Courtney Jones*

Courtney Jones, P.E.  
Deputy General Manager  
City of Ontario

cc: Scott Burton - General Manger, Ontario Municipal Utilities Company  
Chad Nishida - Water Resources Manager, Ontario Municipal Utilities Company  
Chris Diggs – Chair, Appropriative Pool  
Chris Berch – Vice Chair, Appropriative Pool

# **EXHIBIT 2**

---

**From:** Courtney Jones <CJJones@ontarioca.gov>  
**Sent:** Friday, June 21, 2024 11:53 AM  
**To:** Diggs, Chris; Chris Berch  
**Cc:** Scott Burton  
**Subject:** RE: Legal Expenses

Good morning AP Chair and Vice Chair,

I am following up on my request below. Ontario is requesting the AP Legal invoice backup documentation to process our remaining unpaid invoices. Specifically, we are looking for the invoices from John Schatz that were approved and paid by the AP to administer our remaining payment.

Please reach out if you have any questions or concerns.

Thanks!  
Courtney

Courtney Jones, P.E.  
Deputy General Manager  
Ontario Municipal Utilities Company

---

**From:** Courtney Jones  
**Sent:** Wednesday, March 27, 2024 4:17 PM  
**To:** Diggs, Chris <Chris.Diggs@pomonaca.gov>  
**Cc:** Scott Burton <SBurton@ontarioca.gov>  
**Subject:** Legal Expenses

Hi Chris,

I understand that Dave and Justin contacted you about their outstanding share of Ag Legal invoices. I'm following up because Ontario is examining our unpaid invoices for Ag Legal due to the appellate ruling. It would be helpful if you could provide an updated balance of what our agency owes and the itemized invoices as supporting documents for Ag Legal, AP Legal, and any other AP expenses (i.e., Tom Harder). This will help us complete our evaluation and determine our payment.

Thanks!  
Courtney

**Courtney Jones, P.E.**  
Water Resources and Regulatory Affairs Director



1425 S. Bon View Avenueo indicate that  
Ontario, CA 91761-4406  
Phone: (909) 395-2640  
E-mail: [cjjones@ontarioca.gov](mailto:cjjones@ontarioca.gov)

---

**From:** Diggs, Chris <Chris.Diggs@pomonaca.gov>  
**Sent:** Wednesday, March 27, 2024 5:08 PM  
**To:** Courtney Jones  
**Cc:** Scott Burton  
**Subject:** RE: Legal Expenses

Hi Courtney, we are working on this and I will send to you ASAP.

CD

**From:** Courtney Jones <CJJones@ontarioca.gov>  
**Sent:** Wednesday, March 27, 2024 4:17 PM  
**To:** Diggs, Chris <Chris.Diggs@pomonaca.gov>  
**Cc:** Scott Burton <SBurton@ontarioca.gov>  
**Subject:** Legal Expenses

**CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.**

Hi Chris,

I understand that Dave and Justin contacted you about their outstanding share of Ag Legal invoices. I'm following up because Ontario is examining our unpaid invoices for Ag Legal due to the appellate ruling. It would be helpful if you could provide an updated balance of what our agency owes and the itemized invoices as supporting documents for Ag Legal, AP Legal, and any other AP expenses (i.e., Tom Harder). This will help us complete our evaluation and determine our payment.

Thanks!  
Courtney

**Courtney Jones, P.E.**

Water Resources and Regulatory Affairs Director



1425 S. Bon View Avenueo indicate that  
Ontario, CA 91761-4406  
Phone: (909) 395-2640  
E-mail: [cjjones@ontarioca.gov](mailto:cjjones@ontarioca.gov)

# **EXHIBIT 3**

**To:** Diggs, Chris <Chris.Diggs@pomonaca.gov>

**Cc:** Chris Berch <cberch@jcsd.us>; Scott Burton <SBurton@ontarioca.gov>; Justin Scott-Coe <jscottcoe@mvwd.org>; Dave Crosley <dcrosley@cityofchino.org>

**Subject:** RE: AP Invoices

Good afternoon Chris,

I am following up on my below email send last week. Please reply to this email letting us know if you will provide the invoices to us, and by when. If we don't receive a response by end of business today, **7/29/24**, we may need to treat that as a refusal for purposes of our settlement discussion, the Public Records Act, and any court filings.

Thank you,  
Courtney

Courtney Jones, P.E.  
Deputy General Manager  
Ontario Municipal Utilities Company

---

**From:** Courtney Jones

**Sent:** Friday, July 19, 2024 10:53 AM

**To:** Diggs, Chris <[Chris.Diggs@pomonaca.gov](mailto:Chris.Diggs@pomonaca.gov)>

**Cc:** Chris Berch <[cberch@jcsd.us](mailto:cberch@jcsd.us)>; Scott Burton <[SBurton@ontarioca.gov](mailto:SBurton@ontarioca.gov)>; Justin Scott-Coe <[jscottcoe@mvwd.org](mailto:jscottcoe@mvwd.org)>; Dave Crosley <[dcrosley@cityofchino.org](mailto:dcrosley@cityofchino.org)>

**Subject:** AP Invoices

Good morning Chris,

I'm writing to follow up on requests by Ontario and MVWD/MVIC for copies of AP legal invoices. We're seeking complete copies (i.e., not summaries or redactions) of all the AP legal invoices, including invoices for all AP attorneys/legal consultants, that you received during your time as AP Chairperson.

As members of the AP, we have equal rights as all AP members, including Pomona, to see the invoices that we're being asked to pay. We don't think it should be necessary to make a Public Records Act request, but if that's what it takes for us to receive the invoices, then please treat this email as such.

Time is of the essence given the imperative to reach a settlement or respond to the pending motion by August 1. So please reply to this email **by Monday, 7/22/24**, letting us know if you will provide the invoices to us, and by when. If we don't receive a response, we may need to treat that as a refusal for purposes of our settlement discussion, the Public Records Act, and any court filings.

Thank you for your time,  
Courtney

**Courtney Jones, P.E.**

Deputy General Manager



1425 S. Bon View Avenue

Ontario, CA 91761-4406

Phone: (909) 395-2640

E-mail: [cjones@ontarioca.gov](mailto:cjones@ontarioca.gov)

# **EXHIBIT 4**

---

**From:** Taya Victorino <[tayav@cvwdwater.com](mailto:tayav@cvwdwater.com)>  
**Sent:** Wednesday, July 24, 2024 10:50 AM  
**To:** Courtney Jones <[CJJones@ontarioca.gov](mailto:CJJones@ontarioca.gov)>  
**Cc:** Scott Burton <[SBurton@ontarioca.gov](mailto:SBurton@ontarioca.gov)>; [jscottcoe@mvwd.org](mailto:jscottcoe@mvwd.org); [dcrosley@cityofchino.org](mailto:dcrosley@cityofchino.org); Eduardo Espinoza <[EduardoE@cvwdwater.com](mailto:EduardoE@cvwdwater.com)>; John Bosler <[JohnB@cvwdwater.com](mailto:JohnB@cvwdwater.com)>; Cindy Cisneros <[CindyC@cvwdwater.com](mailto:CindyC@cvwdwater.com)>  
**Subject:** RE: AP Invoices

Good morning Courtney,  
We have received your public records request dated July 23, 2024. We will research the documents responsive to your request and respond to you within 10 days of receipt of your request (by August 2, 2024 ).

Thank you,  
Taya Victorino, CMC  
Executive Services Administrator / District Clerk  
(909) 987-2591



[\[linkprotect.cudasvc.com\]](https://linkprotect.cudasvc.com)

10440 Ashford Street  
Rancho Cucamonga, CA 91730  
[www.CVWDWater.com](http://www.CVWDWater.com) [\[linkprotect.cudasvc.com\]](https://linkprotect.cudasvc.com)

---

**From:** Courtney Jones <[CJJones@ontarioca.gov](mailto:CJJones@ontarioca.gov)>  
**Sent:** Tuesday, July 23, 2024 2:06 PM  
**To:** Eduardo Espinoza <[EduardoE@cvwdwater.com](mailto:EduardoE@cvwdwater.com)>  
**Cc:** John Bosler <[JohnB@cvwdwater.com](mailto:JohnB@cvwdwater.com)>; Scott Burton <[SBurton@ontarioca.gov](mailto:SBurton@ontarioca.gov)>; Justin Scott-Coe <[jscottcoe@mvwd.org](mailto:jscottcoe@mvwd.org)>; Dave Crosley <[dcrosley@cityofchino.org](mailto:dcrosley@cityofchino.org)>  
**Subject:** AP Invoices

Good afternoon Eduardo,

I'm writing to follow up on requests by Ontario and MVWD/MVIC for copies of AP legal invoices. We're seeking complete copies (i.e., not summaries or redactions) of all the AP legal invoices, including invoices for all AP attorneys/legal consultants, that you received during your time as AP Chairperson.

As members of the AP, we have equal rights as all AP members, including CVWD, to see the invoices that we're being asked to pay. We don't think it should be necessary to make a Public Records Act request, but if that's what it takes for us to receive the invoices, then please treat this email as such.

Time is of the essence given the imperative to reach a settlement or respond to the pending motion by August 1. So please reply to this email **by Thursday, 7/25/24**, letting us know if you will provide the invoices to us, and by



when. If we don't receive a response, we may need to treat that as a refusal for purposes of our settlement discussion, the Public Records Act, and any court filings.

Thank you for your time,  
Courtney

**Courtney Jones, P.E.**

Deputy General Manager



1425 S. Bon View Avenue

Ontario, CA 91761-4406

Phone: (909) 395-2640

E-mail: [cjones@ontarioca.gov](mailto:cjones@ontarioca.gov)

# **EXHIBIT 5**

---

**From:** Courtney Jones  
**Sent:** Tuesday, July 30, 2024 5:18 PM  
**To:** [tcorbin@cbwm.org](mailto:tcorbin@cbwm.org)  
**Cc:** Justin Scott-Coe <[jscottcoe@mvwd.org](mailto:jscottcoe@mvwd.org)>; Scott Burton <[SBurton@ontarioca.gov](mailto:SBurton@ontarioca.gov)>  
**Subject:** Escrow Account Inquiry

Hi Todd,

I'm following up on our discussion from earlier today regarding the potential setup of an escrow account for the unpaid Appropriative Pool Legal and Administrative assessments. As you know, Ontario and MVWD/MVIC are exploring this option with Watermaster. This approach was previously utilized in 2020 for the Agricultural Pool Legal and Other Expenses dispute. At that time, members of the Appropriative Pool deposited funds into an escrow account to cover legal and expert expenses that exceeded the fiscal year 2019-20 budget.

From our conversation, Watermaster is still assessing whether setting up a similar escrow account is feasible, what kind of direction they would need, and who should provide the direction, given that this is not standard practice. Please let me know if there's anything I can do to assist.

Thank you,  
Courtney

**Courtney Jones, P.E.**

Deputy General Manager



1425 S. Bon View Avenue

Ontario, CA 91761-4406

Phone: (909) 395-2640

E-mail: [cjones@ontarioca.gov](mailto:cjones@ontarioca.gov)

CHINO BASIN WATERMASTER

Case No. RCVRS 51010

Chino Basin Municipal Water District v. City of Chino, et al.

PROOF OF SERVICE

I declare that:

I am employed in the County of San Bernardino, California. I am over the age of 18 years and not a party to the action within. My business address is Chino Basin Watermaster, 9641 San Bernardino Road, Rancho Cucamonga, California 91730; telephone (909) 484-3888.

On August 1, 2024 I served the following:

1. DECLARATION OF COURTNEY JONES IN SUPPORT OF OPPOSITION TO APPROPRIATIVE POOL'S MOTION FOR AWARD OF EXPENSES

/X/ BY MAIL: in said cause, by placing a true copy thereof enclosed with postage thereon fully prepaid, for delivery by the United States Postal Service mail at Rancho Cucamonga, California, addresses as follows:

**See attached service list:** Mailing List 1

/ BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee.

/ BY FACSIMILE: I transmitted said document by fax transmission from (909) 484-3890 to the fax number(s) indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting fax machine.

/X/ BY ELECTRONIC MAIL: I transmitted notice of availability of electronic documents by electronic transmission to the email address indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting electronic mail device.

**See attached service list:** Master Email Distribution List

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

Executed on August 1, 2024 in Rancho Cucamonga, California.

  
\_\_\_\_\_  
By: Ruby Favela Quintero  
Chino Basin Watermaster

PAUL HOFER  
11248 S TURNER AVE  
ONTARIO, CA 91761

JEFF PIERSON  
2 HEXAM  
IRVINE, CA 92603

## **Ruby Favela Quintero**

---

**Contact Group Name:** Master Email Distribution

**Categories:** Main Email Lists

## Members:

Adrian Gomez	agomez@emeraldus.com
Alan Frost	Alan.Frost@dpw.sbcounty.gov
Alberto Mendoza	Alberto.Mendoza@cmc.com
Alejandro R. Reyes	arreyes@sgvwater.com
Alex Padilla	Alex.Padilla@wsp.com
Alexis Mascarinas	AMascarinas@ontarioca.gov
Alfonso Ruiz	alfonso.ruiz@cmc.com
Allen Hubsch	ahubsch@hubschlaw.com
Alma Heustis	alma.heustis@nucor.com
Alonso Jurado	ajurado@cbwm.org
Alyssa Coronado	acoronado@sarwc.com
Amanda Coker	amandac@cvwdwater.com
Amy Bonczewski	ABonczewski@ontarioca.gov
Andrew Gagen	agagen@kidmanlaw.com
Andy Campbell	acampbell@ieua.org
Andy Malone	amalone@westyost.com
Angelica Todd	angelica.todd@ge.com
Anna Nelson	atruongnelson@cbwm.org
Anthony Alberti	aalberti@sgvwater.com
April Robitaille	arobitaille@bhfs.com
Art Bennett	citycouncil@chinohills.org
Arthur Kidman	akidman@kidmanlaw.com
Ashley Zapp	ashley.zapp@cmc.com
Ashok Dhingra	ash@akdconsulting.com
Ben Lewis	benjamin.lewis@gswater.com
Ben Markham	bmarkham@bhfs.com
Ben Roden	BenR@cvwdwater.com
Benjamin M. Weink	ben.weink@tetrattech.com
Beth.McHenry	Beth.McHenry@hoferranch.com
Bill Schwartz	bschwartz@mvwd.org
Bill Velto	bvelto@uplandca.gov
Board Support Team IEUA	BoardSupportTeam@ieua.org
Bob Bowcock	bbowcock@irmwater.com
Bob DiPrimio	rjdprimio@sgvwater.com
Bob Feenstra	bobfeenstra@gmail.com
Bob Kuhn	bgkuhn@aol.com
Bob Kuhn	bkuhn@tvmwd.com
Bob Page	Bob.Page@rov.sbcounty.gov
Brad Herrema	bherrema@bhfs.com
Bradley Jensen	bradley.jensen@cao.sbcounty.gov
Brandi Belmontes	BBelmontes@ontarioca.gov
Brandi Goodman-Decoud	bgdecoud@mvwd.org
Brandon Howard	brahoward@niagarawater.com
Brenda Fowler	balee@fontanawater.com
Brent Yamasaki	byamasaki@mwdh2o.com
Brett Godown	Brett.Godown@Airports.SBCounty.Gov
Brian Dickinson	bdickinson65@gmail.com
Brian Geye	bgeye@autoclubspeedway.com
Brian Lee	blee@sawaterco.com
Bryan Smith	bsmith@jcsd.us
Carmen Sierra	carmens@cvwdwater.com

Carol Boyd Carol.Boyd@doj.ca.gov  
Carolina Sanchez csanchez@westyost.com  
Casey Costa ccosta@chinodesalter.org  
Cassandra Hooks chooks@niagarawater.com  
Cathleen Pieroni - Inland Empire Utilities Agency (cpieroni@ieua.org) cpieroni@ieua.org  
Chad Blais cblais@ci.norco.ca.us  
Chad Nishida CNishida@ontarioca.gov  
Chander Letulle cletulle@jcsd.us  
Charles Field cdfield@att.net  
Charles Moorrees cmoorrees@sawaterco.com  
Chino Hills City Council citycouncil@chinohills.org  
Chris Berch cberch@jcsd.us  
Chris Diggs Chris\_Diggs@ci.pomona.ca.us  
Christen Miller Christen.Miller@cao.sbcounty.gov  
Christensen, Rebecca A rebecca\_christensen@fws.gov  
Christiana Daisy cdaisy@ieua.org  
Christopher M. Sanders cms@eslawfirm.com  
Christopher R. Guillen cguillen@bhfs.com  
Cindy Cisneros cindyc@cvwdwater.com  
Cindy Li Cindy.li@waterboards.ca.gov  
City of Chino, Administration Department

administration@cityofchino.org  
Courtney Jones cjones@ontarioca.gov  
Craig Miller CMiller@wmwd.com  
Craig Stewart craig.stewart@wsp.com  
Cris Fealy cifealy@fontanawater.com  
Curtis Burton CBurton@cityofchino.org  
Dan McKinney dmckinney@douglascountylaw.com  
Daniel Bobadilla dbobadilla@chinohills.org  
Daniela Uriarte dUriarte@cbwm.org  
Danny Kim dkim@linklogistics.com  
Dave Argo daveargo46@icloud.com  
Dave Crosley DCrosley@cityofchino.org  
Dave Schroeder DSchroeder@cbwcd.org  
David Barnes DBarnes@geoscience-water.com  
David De Jesus ddejesus@tvmwd.com  
David Schroeder (dschroeder@cbwcd.org)

dschroeder@cbwcd.org  
Dawn Varacchi-Ives (dawn.varacchi@ge.com)

dawn.varacchi@ge.com  
Denise Garzaro dgarzaro@ieua.org  
Dennis Mejia dmejia@ontarioca.gov  
Dennis Williams dwilliams@geoscience-water.com  
Derek Hoffman dhoffman@fennemorelaw.com  
Diana Frederick diana.frederick@cdcr.ca.gov  
Ed Diggs ediggs@uplandca.gov  
Ed Means edmeans@icloud.com  
Eddie Lin (elin@ieua.org) elin@ieua.org  
Edgar Tellez Foster etellezfoster@cbwm.org  
Eduardo Espinoza EduardoE@cvwdwater.com  
Elizabeth M. Calciano ecalciano@hensleylawgroup.com  
Elizabeth P. Ewens elizabeth.ewens@stoel.com



Elizabeth Willis  
Eric Fordham  
Eric Garner  
Eric Grubb  
Eric Lindberg PG,CHG  
Eric N. Robinson  
Eric Papathakis  
Eric Tarango  
Erik Vides  
Erika Clement  
Eunice Ulloa  
Eunice Ulloa - City of Chino (eulloa@cityofchino.org)

ewillis@cbwcd.org  
eric\_fordham@geopentech.com  
eric.garner@bbklaw.com  
ericg@cvwdwater.com  
eric.lindberg@waterboards.ca.gov  
erobinson@kmtg.com  
Eric.Papathakis@cdcr.ca.gov  
edtarango@fontanawater.com  
evides@cbwm.org  
Erika.clement@sce.com  
eulloa@cityofchino.org

Evette Ounanian  
Frank Yoo  
Fred Fudacz  
Fred Galante  
G. Michael Milhiser  
G. Michael Milhiser  
Garrett Rapp  
Geoffrey Kamansky  
Geoffrey Vanden Heuvel  
Gerald Yahr  
Gina Gomez  
Gina Nicholls  
Gino L. Filippi  
Gracie Torres  
Grant Mann  
Greg Zarco  
Gregor Larabee  
Ha T. Nguyen  
Henry DeHaan  
Hvianca Hakim  
Hye Jin Lee  
Imelda Cadigal  
Insixiengmay, Maria  
Irene Islas  
Ivy Capili  
James Curatalo  
Janelle S.H. Krattiger, Esq  
Jasmin A. Hall  
Jason Marseilles  
Jayne Joy  
Jean Cihigoyenetché  
Jeff Evers  
Jeff Mosher  
Jeffrey L. Pierson  
Jenifer Ryan  
Jennifer Hy-Luk  
Jeremy N. Jungries  
Jesse Pompa  
Jessie Ruedas  
Jill Keehnen

eulloa@cityofchino.org  
EvetteO@cvwdwater.com  
FrankY@cbwm.org  
ffudacz@nossaman.com  
fgalante@awattorneys.com  
directormilhiser@mvwd.org  
Milhiser@hotmail.com  
grapp@westyost.com  
gkamansky@niagarawater.com  
geoffreyvh60@gmail.com  
yahrj@koll.com  
ggomez@ontarioca.gov  
gnicholls@nossaman.com  
Ginoffvine@aol.com  
gtorres@wmwd.com  
GMann@dpw.sbcounty.gov  
Greg.Zarco@airports.sbcounty.gov  
Gregor.Larabee@cdcr.ca.gov  
ha.nguyen@stoel.com  
Hdehaan1950@gmail.com  
HHakim@linklogistics.com  
HJLee@cityofchino.org  
Imelda.Cadigal@cdcr.ca.gov  
Maria.Insxiengmay@cc.sbcounty.gov  
irene.islas@bbklaw.com  
ICapili@bhfs.com  
jamesc@cvwdwater.com  
janelle.krattiger@stoel.com  
jhall@ieua.org  
jmarseilles@ieua.org  
Jayne.Joy@waterboards.ca.gov  
Jean@thejclawfirm.com  
jevers@niagarawater.com  
jmosher@sawpa.org  
jpierson@intexcorp.com  
jryan@kmtg.com  
jhyluk@ieua.org  
jjungreis@rutan.com  
jpompa@jcsd.us  
Jessie@thejclawfirm.com  
jill.keehnen@stoel.com

Jim Markman	jmarkman@rwglaw.com
Jim W. Bowman	jbowman@ontarioca.gov
jimmiem@cvwdwater.com	jimmiem@cvwdwater.com
Jimmy Gutierrez - Law Offices of Jimmy Gutierrez	
	jimmylaredo@gmail.com
Jimmy L. Gutierrez	Jimmy@City-Attorney.com
Jimmy Medrano	Jaime.medrano2@cdcr.ca.gov
Jiwon Seung	JiwonS@cvwdwater.com
Joanne Chan	jchan@wwwd.org
Joao Feitoza	joao.feitoza@cmc.com
Jody Roberto	jroberto@tvmwd.com
Joe Graziano	jgraz4077@aol.com
Joel Ignacio	jignacio@ieua.org
John Bosler	johnb@cvwdwater.com
John Harper	jrharper@harperburns.com
John Hughes - Monte Vista Water District (jhughes@mvmwd.org)	
	jhughes@mvmwd.org
John Huitsing	johnhuitsing@gmail.com
John Lopez	jlopez@sarwc.com
John Lopez and Nathan Cole	customerservice@sarwc.com
John Mendoza	jmendoza@tvmwd.com
John Partridge	jpartridge@angelica.com
John Russ	jruss@ieua.org
John Schatz	jschatz13@cox.net
Jordan Garcia	kgarcia@cbwm.org
Jose A Galindo	Jose.A.Galindo@linde.com
Jose Ventura	jose.ventura@linde.com
Josh Swift	jmswift@fontanawater.com
Joshua Aguilar	jaguilar1@wmwd.com
Justin Brokaw	jbrokaw@marygoldmutualwater.com
Justin Nakano	JNakano@cbwm.org
Justin Scott-Coe Ph. D.	jscottcoe@mvmwd.org
Kaitlyn Dodson-Hamilton	kaitlyn@tdaenv.com
Karen Williams	kwilliams@sawpa.org
Kathleen Brundage	kathleen.brundage@californiasteel.com
Keith Person	keith.person@waterboards.ca.gov
Kelly Ridenour	KRIDENOUR@fennemorelaw.com
Ken Waring	kwaring@jcsd.us
Kevin O'Toole	kotoole@ocwd.com
Kevin Sage	Ksage@IRMwater.com
kparker@katithewaterlady.com	kparker@katithewaterlady.com
Krista Paterson	Kpaterson@kmtg.com
Kurt Berchtold	kberchtold@gmail.com
Kyle Brochard	KBrochard@rwglaw.com
Kyle Snay	kylesnay@gswater.com
Laura Roughton	lroughton@wmwd.com
Laura Yraceburu	lyraceburu@bhfs.com
Lauren V. Neuhaus, Esq.	lauren.neuhaus@stoel.com
Lee McElhaney	lmcElhaney@bmklawplc.com
Lewis Callahan	Lewis.Callahan@cdcr.ca.gov
Linda Jadeski	ljadeski@wwwd.org
Liz Hurst	ehurst@ieua.org
Lorena Heredia	lheredia@ieua.org

Mallory Gandara	MGandara@wmwd.com
Manny Martinez - Monte Vista Water District Director	DirectorMartinez@mvwd.org
Marcella Correa	MCorrea@rwglaw.com
Marco Tule	mtule@ieua.org
Maria Ayala	mayala@jcsd.us
Maria Mendoza	mmendoza@westyost.com
Maribel Sosa	msosa@ci.pomona.ca.us
Marilynhlevin@gmail.com	Marilynhlevin@gmail.com
Marissa Turner	mtturner@tvmwd.com
Mark D. Hensley	mhensley@hensleylawgroup.com
Mark Wiley	mwiley@chinohills.org
Marlene B. Wiman	mwiman@nossaman.com
Martin Cihigoyenetché	marty@thejclawfirm.com
Martin Rauch	martin@rauchcc.com
Martin Zvirbulis	mezvirbulis@sgvwater.com
Matthew H. Litchfield	mlitchfield@tvmwd.com
Maureen Snelgrove	Maureen.snelgrove@airports.sbcounty.gov
Melanie Trevino	Mtrevino@jcsd.us
Michael Adler	michael.adler@mcmcn.net
Michael B. Brown, Esq.	michael.brown@stoel.com
Michael Blay	mblay@uplandca.gov
Michael Fam	mfam@dpw.sbcounty.gov
Michael Hurley	mhurley@ieua.org
Michael Mayer	Michael.Mayer@dpw.sbcounty.gov
Michael P. Thornton	mthornton@tkeengineering.com
Michelle Licea	mlicea@mvwd.org
Mikayla Coleman	mikayla@cvstrat.com
Mike Gardner	mgardner@wmwd.com
Mike Maestas	mikem@cvwdwater.com
Miriam Garcia	mgarcia@ieua.org
Monica Nelson	mnelson@ieua.org
Moore, Toby	TobyMoore@gswater.com
MWDProgram	MWDProgram@sdca.org
Nadia Aguirre	naguirre@tvmwd.com
Natalie Avila	navila@cityofchino.org
Natalie Costaglio	natalie.costaglio@mcmcn.net
Nathan deBoom	n8deboom@gmail.com
Neetu Gupta	ngupta@ieua.org
Nichole Horton	Nichole.Horton@pomona.gov
Nick Jacobs	njacobs@somachlaw.com
Nicole deMoet	ndemoet@uplandca.gov
Nicole Escalante	NEscalante@ontarioca.gov
Noah Golden-Krasner	Noah.goldenkrasner@doj.ca.gov
Norberto Ferreira	nferreira@uplandca.gov
Oscar Ramos	omramos@sgvwater.com
Paul Hofer	farmwatchtoo@aol.com
Paul Hofer	farmerhofer@aol.com
Paul S. Leon	pleon@ontarioca.gov
Pete Vicario	PVicario@cityofchino.org
Peter Hettinga	peterhettinga@yahoo.com
Peter Rogers	progers@chinohills.org
Rebekah Walker	rwalker@jcsd.us

Richard Anderson  
Richard Rees  
Rickey S. Manbahal  
Robert DeLoach  
Robert E. Donlan  
Robert Neufeld  
Robert S. (RobertS@cbwcd.org)  
Robert Wagner  
Ron Craig  
Ron LaBrucherie, Jr.  
Ronald C. Pietersma  
Ruben Llamas  
Ruby Favela  
Rudy Nunez  
Ryan Shaw  
Sam Nelson  
Sam Rubenstein  
Sandra S. Rose  
Scott Burton  
Scott Slater  
Seth J. Zielke  
Shawnda M. Grady  
Shivaji Deshmukh  
Sonya Barber  
Sonya Zite  
SRamirez@kmtg.com  
Stephanie Reimer  
Stephen Deitsch  
Stephen Parker - sparker@uplandca.gov

horsfly1@yahoo.com  
richard.rees@wsp.com  
smanbahal@wvwd.org  
robertadeloach1@gmail.com  
red@eslawfirm.com  
robneu1@yahoo.com  
RobertS@cbwcd.org  
rwagner@wbecorp.com  
Rcraig21@icloud.com  
ronLaBrucherie@gmail.com  
rcpietersma@aol.com  
rllamas71@yahoo.com  
rfavela@cbwm.org  
rnunez@cbwm.org  
RShaw@wmwd.com  
snelson@ci.norco.ca.us  
srubenstein@wpcarey.com  
directorrose@mvwd.org  
sburton@ontarioca.gov  
sslater@bhfs.com  
sjzielke@fontanawater.com  
sgrady@eslawfirm.com  
sdeshmukh@ieua.org  
sbarber@ci.upland.ca.us  
szite@wmwd.com  
SRamirez@kmtg.com  
SReimer@mvwd.org  
stephen.deitsch@bbklaw.com

sparker@uplandca.gov  
skennedy@bmklawplc.com  
steve.anderson@bbklaw.com  
snix@ci.upland.ca.us  
ssmith@ieua.org  
sandrews@sandrewsengineering.com  
sflower@rwglaw.com  
s.elie@mpglaw.com  
selie@ieua.org  
spopelar@jcsd.us  
Steven.Raughley@isd.sbcounty.gov  
spalmer@kidmanlaw.com  
slee@tvmwd.com  
tford@wmwd.com  
Tariq.Awan@cdcr.ca.gov  
tayav@cvwdwater.com  
tlayton@sawaterco.com  
TWhitman@kmtg.com  
tlcatlin@wfajpa.org  
Twatkins@geoscience-water.com  
tombunn@lagerlof.com  
tbarr@wmwd.com  
tmoore@westyost.com  
tjryan@sgvwater.com

Steve Kennedy  
Steve M. Anderson  
Steve Nix  
Steve Smith  
Steven Andrews Engineering  
Steven Flower  
Steven J. Elie  
Steven J. Elie  
Steven Popelar  
Steven Raughley  
Susan Palmer  
Sylvie Lee  
Tammi Ford  
Tariq Awan  
Taya Victorino  
Teri Layton  
Terri Whitman  
Terry Catlin  
Terry Watkins  
Thomas S. Bunn  
Tim Barr  
Tim Moore  
Timothy Ryan

Toby Moore	toby.moore@gswater.com
Todd M. Corbin (tcorbin@cbwm.org)	tcorbin@cbwm.org
Tom Barnes	tbarnes@esassoc.com
Tom Bunn	TomBunn@Lagerlof.com
Tom Cruikshank	tcruikshank@linklogistics.com
Tom Dodson (tda@tdaenv.com)	tda@tdaenv.com
Tom Harder	tharder@thomashardercompany.com
Tom O'Neill	toneill@chinodesalter.org
Toni Medell	mmedel@mbakerintl.com
Tony Long	tlong@angelica.com
Toyasha Sebbag	tsebbag@cbwcd.org
Tracy J. Egoscue	tracy@egoscuelaw.com
Trevor Leja	Trevor.Leja@cao.sbcounty.gov
Veva Weamer	vweamer@westyost.com
Victor Preciado	Victor_Preciado@ci.pomona.ca.us
Vivian Castro	vcastro@cityofchino.org
Wade Fultz	Wade.Fultz@cmc.com
WestWater Research, LLC	research@waterexchange.com
William Brunick	bbrunick@bmklawplc.com
William McDonnell	wmcdonnell@ieua.org
William Urena	wurena@emeraldus.com