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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF KERN**

14 BRING BACK THE KERN, WATER AUDIT
15 CALIFORNIA, KERN RIVER PARKWAY
16 FOUNDATION, KERN AUDUBON
17 SOCIETY, SIERRA CLUB, and CENTER FOR
18 BIOLOGICAL DIVERSITY,

17 Plaintiffs and Petitioners,

18 vs.

19 CITY OF BAKERSFIELD
20 and DOES 1 through 500,

21 Defendants and Respondents,

22 BUENA VISTA WATER STORAGE
23 DISTRICT, KERN DELTA WATER
24 DISTRICT, NORTH KERN WATER
25 STORAGE DISTRICT, ROSEDALE-RIO
26 BRAVO WATER STORAGE DISTRICT,
27 KERN COUNTY WATER AGENCY, and
28 DOES 501-999,

Real Parties in Interest.

Case No.: BCV-22-103220

**PLAINTIFFS' COMBINED OPPOSITION
TO KCWA'S AND REAL PARTIES'
MOTIONS FOR RECONSIDERATION
AND STAY**

Complaint Filed: November 30, 2022
First Amended Complaint Filed: March 6, 2023
Second Amended Complaint Filed: October 4,
2023
Third Amended Complaint Filed: December 1,
2023

Date: December 21, 2023
Time: 9:00 a.m.
Dept.: 8
Judge: Hon. Gregory Pulskamp

TABLE OF AUTHORITIES

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Statutes

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1 **INTRODUCTION**

2 Real Party in Interest Kern County Water Agency (“KCWA”); Real Party in Interest Kern Delta
3 Water District, North Kern Water Storage District, Buena Vista Water Storage District, and by joinder,
4 Rosedale-Rio Bravo Water Storage District (“Real Parties”) separately seek reconsideration and stay of
5 this Court’s Order Granting Plaintiffs’ Motion for Preliminary Injunction, dated November 9, 2023
6 (“Preliminary Injunction Order”) and this Court’s Order dated November 14, 2023 (“Implementation
7 Order”). The motions are focused almost entirely on the Implementation Order; to the extent that there
8 is any argument regarding the Preliminary Injunction Order it is an effort to relitigate issues that were
9 already decided in that order and are not appropriate to raise in this motion for reconsideration. The
10 only new facts alleged in either motion concern the details of the City of Bakersfield’s management of
11 its weirs in response to the Implementation Order, and these facts focus on just one aspect of that
12 management: the City’s reserving water for its municipal needs before allocating water for fish flows
13 and then allocating water for other diverters. Plaintiffs take no position on the negotiated compromise
14 that permits the City to allocate water for its municipal needs before allocating water for fish flows.
15 Plaintiffs do oppose the motions to the extent they challenge the flow regime that allocates 40% of
16 Kern flows to the river, for fish. The motions present no new facts or argument to challenge that aspect
17 of the Implementation Order.

18 KCWA complains that it has not had adequate time to retain expert witnesses, while Real
19 Parties complain that they have not been given notice or opportunity to be heard, but they have had four
20 months, since August 10, 2023, when the motion for preliminary injunction was filed. They knew then
21 they wished to oppose the relief sought by the Plaintiffs. KCWA and Real Parties participated in the
22 filing of a fifty -page opposition, offered extensive oral argument, and cannot now have a second bite at
23 the apple. To the extent that KCWA and Real Parties argue the issues of priority and authorization
24 between the beneficial claimants, the Plaintiffs are agnostic. As set forth below, such matters are not
25 part of this litigation.

26 Plaintiffs sought and the Court issued an order preventing the City from diverting more water
27 than required to keep the fish below each of its weirs in good condition. As instructed by the Court,
28 Plaintiffs and the City quickly negotiated an interim flow regime that would provide immediate

1 protection for fish flows, protect the City’s municipal needs in the face of the unknown impacts of the
2 interim flow regime, and provide required data that will form the basis of further adjustments to the
3 flow regime during the pendency of this action. The Implementation Order is merely an interim plan,
4 designed to be adjusted and modified as soon and as often as necessary. Plaintiffs are open to all parties
5 participating in discussions about future modifications to the flow regime. But the motions for
6 reconsideration are not the appropriate vehicle for that discussion or those adjustments.

7 To be clear, Plaintiffs did not intend through their agreeing to the City’s request regarding its
8 municipal flows to grant the City any new entitlements. Plaintiffs’ objectives were to obtain as quickly
9 as possible a minimal flow of water to protect the river’s fish and provide essential data through
10 sufficient and consistent monitoring in order to govern future decisions on river flows. Plaintiffs cannot
11 and do not attempt to grant the City water rights that do not exist. To the extent that the Implementation
12 Order improperly creates water rights or disrupts existing rights in a manner that exceeds the scope of
13 the Court’s Preliminary Injunction Order (which is focused on the City’s compliance with Fish and
14 Game Code section 5937 and the Public Trust Doctrine), Plaintiffs do not object in principle to
15 *modification* of the Implementation Order. But reconsideration (or staying) of either order, as sought by
16 KCWA and Real Parties, is not warranted.

17 ARGUMENT

18 A. The Motions Fail to Provide Predicate New Facts, Law or Circumstance.

19 A motion for reconsideration is not an unfettered opportunity to reargue a lost cause. Code of
20 Civil Procedure, section 1008’s purpose is “to conserve judicial resources by constraining litigants who
21 would endlessly bring the same motions over and over or move for reconsideration of every adverse
22 order and then appeal the denial of the motion to reconsider.” (Sen. Com. on Judiciary, Analysis of
23 Assem. Bill No. 1067 (2011–2012 Reg. Sess.), as amended Apr. 25, 2011, p. 4.)

24 A motion for reconsideration must be “based upon new or different facts, circumstances, or law
25 ... The party making the application shall state by affidavit what application was made before, when
26 and to what judge, what order or decisions were made, and what new or different facts, circumstances,
27 or law are claimed to be shown.” (Code Civ. Proc., § 1008(a).) “No application to reconsider any order
28

1 or for the renewal of a previous motion may be considered by any judge or court unless made according
2 to this section.” (Code Civ. Proc., § 1008(e).)

3 Courts have construed section 1008 to require a party filing an application for
4 reconsideration or a renewed application to show diligence with a satisfactory
5 explanation for not having presented the new or different information earlier. (*California*
6 *Correctional Peace Officers Assn. v. Virga*, supra, 181 Cal.App.4th at pp. 46–47 & fns.
7 14–15, 103 Cal.Rptr.3d 699 ; see *Garcia v. Hejmadi*, supra, 58 Cal.App.4th at pp. 688–
8 690, 68 Cal.Rptr.2d 228.)

9 (*Even Zohar Construction & Remodeling, Inc. v. Bellaire Townhouses, LLC* (2015) 61
10 Cal.4th 830, 839.)

11 The requirement for new facts, law or circumstances is jurisdictional.

12 Section 1008 expressly applies to all renewed applications for orders the court has
13 previously refused. Section 1008 by its terms “*specifies the court's jurisdiction* with
14 regard to ... renewals of previous motions and applies to *all applications* ... for the
15 renewal of a previous motion, whether the order deciding the previous matter or motion
16 is interim or final. *No application* ... for the renewal of a previous motion may be
17 considered by any judge or court unless made according to this section.” (*Id.*, subd. (e),
18 italics added.)

19 (*Even Zohar Construction & Remodeling, Inc. v. Bellaire Townhouses, LLC*, supra, 61
20 Cal.4th 830, 840.)

21 Courts have inherent authority under Code of Civil Procedure, section 918, to amend orders,
22 even in the absence of new facts, law or circumstance. On its own motion the court may reconsider all
23 matters before it, but a party may not unilaterally invoke inherent jurisdiction to its advantage.

24 We have recognized only one exception to section 1008's “jurisdiction[al]” (*id.*, subd. (e))
25 exclusivity. In *Le Francois v. Goel* ((2005) 35 Cal.4th 1094, 1096–1097, 29 Cal.Rptr.3d
26 249, 112 P.3d 636 (*Le Francois*)), we held the statute “do[es] not limit a court's ability to
27 reconsider its previous interim orders on its own motion,” even while it “prohibit[s] a
28 party from making renewed motions not based on new facts or law....” We construed
section 1008 in this manner to avoid serious doubts about its validity under the California
Constitution's separation of powers clause. (Cal. Const., art. III, § 3.) “[T]he
Legislature,” we explained, “generally may adopt reasonable regulations affecting a
court's inherent powers or functions, so long as the legislation does not “defeat” or
“materially impair” a court's exercise of its constitutional power or the fulfillment of its
constitutional function.” (*Le Francois*, at p. 1103, 29 Cal.Rptr.3d 249, 112 P.3d 636,
quoting *Superior Court v. County of Mendocino* (1996) 13 Cal.4th 45, 58–59, 51
Cal.Rptr.2d 837, 913 P.2d 1046.)

29 (*Even Zohar Construction & Remodeling, Inc. v. Bellaire Townhouses, LLC*, supra, 61 Cal.4th
30 830, 840.)

31 KCWA and Real Parties fail to present any new facts that arose since the Court issued its
32 Preliminary Injunction Order that remotely suggest that reconsideration of that order is appropriate.

1 KCWA first argues that the Preliminary Injunction Order “was not based on any report or study
2 of Kern River fishes and the habitat/flow conditions necessary to keep them in ‘good condition.’”
3 (KCWA Motion at 7.) It is true that the Preliminary Injunction Order was not based on a report or
4 study of the river’s fishes; but it did not need to be, nor could it be, and the fact that it was not is not a
5 new fact warranting reconsideration.

6 KCWA next claims that the Preliminary Injunction Order was “predicated on an erroneous
7 assumption that 726,000 acre-feet will be available every year.” (KCWA Motion at 13.) KCWA is
8 plainly incorrect that the Preliminary Injunction Order was based on an erroneous assumption that
9 726,000 acre-feet will be available every year. The Court quite clearly discussed the variable nature of
10 Kern River flows in its Ruling. (See Ruling at 12.) The Court acknowledged the difficulty in
11 determining “what impact, if any, compliance with Section 5937 might have on” the Real Parties in
12 Interest, and then noting that “the average annual Kern River flows of approximately 726,000 acre-feet
13 is an enormous amount of water that should suffice for the reasonable use of all interested
14 stakeholders.” (Ruling at 14.) The Court accurately described the average annual flows and properly
15 observed that this amount of water should suffice for the reasonable use of all stakeholders.
16 “Reasonable use,” after all, does not require the satisfaction of a stakeholders’ full water rights. It must
17 consider statutory requirements like section 5937, public trust obligations, and other stakeholders’
18 needs as well.

19 KCWA next argues its municipal uses of Kern River water, including Irrigation District No. 4
20 and several other contracting water districts, warrant reconsideration of both orders. (KCWA Motion
21 at 7-11; 14.) Notably absent from KCWA’s motion are any facts detailing where these municipal
22 supplies are diverted from the river or how the Implementation Order will impact these municipal
23 water needs. The closest KCWA comes to revealing this information is that “some of the water that
24 ID4 may receive could be direct diversion from the Kern River if there is natural flow accruing to the
25 LRR and/or some of the water that ID4 receives may have been previously stored in Lake Isabella and
26 or regional groundwater banking facilities and then released to the Kern River and re-diverted by
27 ID4.” (KCWA Motion at 8-9.) This is vague speculation at best, and far from sufficient to demonstrate
28 how the Implementation Order can affect KCWA’s municipal water needs in any way. But to the

1 extent that any municipal needs are impacted by the Implementation Order, Plaintiffs are willing to
2 work out a compromise similar to the one they worked out with the City, as they stated to KCWA on
3 November 13th in an email to which KCWA never responded. (See Stroud Dec., Exh. M.)

4 KCWA submitted three declarations in support of its motion. Lauren Bauer's employment is
5 reported to be "oversight and management" of various KCWA water projects. She acknowledges that
6 she has never directed or supervised a river remediation and has had no part in any environmental
7 project while at KCWA. Her total experience in the field of environmental remediation pinnaced by
8 having "participated" in an undefined manner in an undisclosed project as a graduate student. She
9 professes no experience whatsoever with the California Environmental Flows Framework structure
10 proposed by Dr. Grantham and offers no alternative protocol for an orderly scientific inquiry. Most
11 importantly, Ms. Bauer previously provided a declaration in opposition to the preliminary injunction
12 and does not in her most recent declaration make any attempt to explain what new facts, law or
13 circumstances necessitate her additional declaration.

14 The second declaration, by attorney Nicholas Jacobs, simply compiles the existing records of
15 this proceeding. It does not attempt to attest to new facts, law or circumstance.

16 The third, by KCWA Improvement District No. 4 ("ID4") employee David Beard, may be
17 divided into two sections. The larger portion is dedicated to a narrative of the water supply relationship
18 between KCWA and the City of Bakersfield. (See Beard Declaration, paragraphs 2 and 3, and 5
19 through 13.) As addressed above, those discussions have no relevance to the pending litigation.

20 The remaining two paragraphs are a hearsay derivative of a declaration previously submitted in
21 the KCWA opposition to the preliminary injunction application, and are prima facie not supportive of
22 a motion for reconsideration:

23 4. The LRR is described in detail in the September 28, 2023 Declaration of Lauren
24 Bauer that was submitted on October 2, 2023 in support of the opposition brief for
25 Plaintiffs' motion for preliminary injunction. Paragraphs 7 and 8 of Ms. Bauer's
26 declaration provide a high-level explanation of the LRR, including when and how much
27 Kern River water may be diverted and the fact that KCWA holds a right to store that
28 water in Lake Isabella. ...

13. As described in paragraph 8 of Ms. Bauer's declaration dated September 28,
2023 and submitted in opposition to the motion for preliminary injunction, the LRR may
begin accruing water entitlement on January 1. ...

1 These paragraphs do not constitute new facts, law or circumstance that have arisen since the
2 hearing of the injunction application.

3 Real Parties argue that “the Consultation Procedure Set Forth in the Injunction Is Prejudicial to
4 the Due Process Rights of the Real Parties in Interest.” (Real Parties’ Motion at 11.) Plaintiffs and the
5 City were ordered to “engage in good faith consultation to establish flow rates necessary for
6 compliance with this order” (Ruling re Preliminary Injunction at 2); as Plaintiffs’ complaint was made
7 against the City, the granting of interim relief appropriately addresses the dispute between those
8 parties. It is the City who owns and controls the weirs at issue, so only the City need be commanded to
9 comply with the injunction by developing an interim flow regime.

10 Real Parties next claim that “the conduct of Bakersfield and the Plaintiffs [re Interim Order]
11 demonstrates that the exclusion of the Real Parties is violative of due process.” (Real Parties’ Motion
12 at 11-12.) Again, the Court ordered that Plaintiffs and the City “engage in good faith consultation to
13 establish flow rates necessary for compliance with this order,” which is exactly what Plaintiffs and the
14 City did. Furthermore, Plaintiffs also made an explicit and direct attempt to engage Real Parties in the
15 continuing process to determine sufficient future bypass. In an email sent to counsel for the City and to
16 Real Parties on November 13, 2023, Water Audit California wrote:

17 The stipulation reached today is a great starting point for environmental reconciliation. Having
18 established an interim bypass flow rate, it is time to get down to business to scientifically
19 determine what is a "sufficient" bypass to keep fish in "good condition" and to satisfy other
20 public trust claims. It has been and remains Water Audit's position that 40% is a best estimate
21 that must be replaced with solid data at the earliest opportunity.

22 First we must have an objective measure and the appearance of the Kern River below each weir
23 at different rates of flow. A time of decreasing flow is the ideal opportunity to acquire this data
24 over a short period of measure. Collaterally, we will learn if there is a difference between the
25 flow required to address the needs of fishes and the other public trust interests.

26 ...
27 If the City or Real Parties take any exception to this process, we stand ready to consider any
28 issue raised. The plaintiffs again solicit the cooperative participation of the City and the Real
29 Parties in this purely objective inquiry. Facts should be uncontested facts.

30 Let us please start by agreeing on the sites for observation. Water Audit can make unilateral
31 selections, but we would rather reach consensus. We would also request that you assign
32 personnel to observe or participate in data collection. Respectfully, this is a good time to put the
33 highly respected Kern water industry's expertise to work.

34 ...

1 (See Stroud Decl., ISO Motion for Reconsideration, Exh. M.)

2 Real Parties did not respond.

3 Real Parties submitted various declarations in support of its motion. However, none meet the
4 requisite requirements to support a motion for reconsideration – new facts, law, or circumstance.

5 **B. The Complaint, Petition and Preliminary Injunction Do Not Seek to Allocate Water**
6 **Between Beneficial Users.**

7 KCWA and Real Parties assert that the Implementation Order, and particularly its prioritizing
8 the City’s municipal water needs before other diversions, is a new fact requiring reconsideration of the
9 Preliminary Injunction Order. In support of this argument both motions detail the legal relationship
10 between KCWA, Real Parties, and the City. The opportunity to brief this topic was discussed and
11 litigated at sufficient length in KCWA’s and Real Parties’ opposition to Plaintiffs’ motion for
12 preliminary injunction.

13 The City and Plaintiffs negotiated the interim flow regime that is expressed in the
14 Implementation Order in good faith, as directed by the Court. Immediately after reaching agreement
15 on the Implementation Order, Plaintiffs offered all Real Parties in Interest the opportunity to engage in
16 further discussions to adjust and modify the interim flow regime. (See Stroud Declaration, Exh. M.)
17 This offer was never responded to.

18 KCWA and Real Parties are clearly most aggrieved by the Implementation Order’s favoring of
19 flows to the City for municipal purposes. Again, this is merely an *interim* flow regime, subject to
20 modification as soon as necessary. To the extent KCWA and/or Real Parties believe not only this
21 favoring of municipal flows but also the quantity of these flows themselves violate any agreements
22 between the City and Real Parties, KCWA and Real Parties should have brought these concerns to all
23 parties and requested appropriate modification.

24 Ultimately, Plaintiffs have no interest in such matters, so long as the City complies with the
25 Preliminary Injunction Order by ensuring sufficient quantities of water to remain flowing over, under,
26 or around its dams to keep the fish in the river in good condition. No part of this litigation is intended
27 to adjudicate water rights disputes. *All* beneficial users are subject to public trust needs, including
28 compliance with section 5937. That one beneficial user may claim priority, estoppel or contractual

1 commitments against another is of no impact to public trust duties. Where the rest of the water goes is
2 of no interest or relevance to this litigation, and Plaintiffs need not and should not be drawn into those
3 disputes.

4 **C. KCWA and Real Parties Misconstrue the Preliminary Injunction.**

5 The Preliminary Injunction Order required Plaintiffs and the City “to quickly develop flow
6 standards in good faith compliance of the law.” (Ruling at 16.) Plaintiffs, and their expert Dr. Ted
7 Grantham, advocated for the application of the CEFF organizational framework in order to quickly
8 establish flow standards while providing for the sharing of data necessary for adjusting and fine-tuning
9 those standards.

10 [CEFF] is structured around the scientific concept of functional flows - components of a
11 river’s flow that sustain the biological, chemical, and physical processes upon which
12 native freshwater species depend. A functional flows approach recognizes that the
13 ecosystem functions are supported through the interaction of flowing water with physical
14 habitat, including channel beds, banks, and floodplains. The condition of physical habitat
15 is recognized as a mediating factor in influencing ecological-flow relationships and is
16 considered in the development of ecological flow criteria in Sections A and B [and
17 therefore field observations must be taken with sufficient granularity to record
18 environmental conditions at minimum flows.]

19 The natural range of functional flow metrics are estimated using a statistical modeling
20 approach, which quantifies the relationships between observed flows at reference-quality
21 gages and catchment characteristics. The models generally perform well in predicting
22 functional flow metrics, but improvements in predictive accuracy would be helpful in
23 supporting the analyses and implementation steps in the Framework. Improvements in
24 the performance of low-flow metric models, in particular, would be helpful for
25 understanding natural, baseline conditions in relation to observed, current conditions, for
26 assessing ecosystem needs, and for quantifying the influence of human activities. There
27 is also a need to improve predictions of functional flow metrics in intermittent and
28 ephemeral streams that experience periods of zero-flow and in streams strongly
influenced by groundwater interactions. Efforts to improve model predictions would help
support implementation of the Framework, particularly in more arid regions of the state
and those subject to requirements of the Sustainable Groundwater Management Act.

(California Environmental Flows Framework: Implementation Workplan, draft August 3,
2021 at 2, 5.)

Existing flow data for the Kern River is maintained by the Nature Conservancy Natural Flows
Database, at <https://rivers.codefornature.org/#/map>. However, this data is merely the historical gross
volume of flow; it does not indicate the environmental consequences of any particular flow volume. It
is necessary to record what the river looks like and behaves like during differing flows.

1 The Implementation Order's provision of 40% of real-time flows provides the information
2 necessary to develop a baseline record. This flow regime needs only pertain until such time as
3 sufficient data can be acquired for reasoned scientific estimation.

4 Hydrological and biological surveying is not a process to be delayed, as uncharacteristically
5 high flows present at the moment are soon to be diminished. Not measuring is restricting the
6 information acquired. Eventually, combined with concurrent analysis of fish and proximate and
7 dependent wildlife, and the human appreciation of the esthetics of a living river, it will become possible
8 by the application of best practices to develop a flexible and robust flow regime. We are not at that
9 plateau as yet.

10 CEFF provides that natural flow:

11 ... estimates and recorded data can be revisited to determine how climate change may
12 affect the ranges for natural FFM and associated ecological flow criteria under future
13 climate scenarios. Changing flow conditions may affect sediment transport and channel
14 morphology. These interactions can be explored in revised flow - ecology relationships
15 and ecological flow criteria that consider potential impacts of changes in climate. Climate
16 induced changes in flow will affect non-ecological (i.e. agricultural) as well as ecological
17 water needs and availability. Tradeoff analyses between different uses of water should
18 account for climate change scenarios and uncertainty when developing environmental
19 flow recommendations that are practical and effectively balance multiple demands on
20 water supplies. Alteration analyses may compare natural flow estimates predicted for
21 historical conditions with natural flow estimates predicted under climate change scenarios
22 to consider how climate change may alter functional flow metrics and flow components.

23 (see California Environmental Flows Framework: Implementation Workplan, draft August 3,
24 2021 at 4.)

25 As a result of the preliminary injunction, the City and Plaintiffs were able to enter into a
26 stipulation that quickly provided an interim flow regime and obligated the City to monitor and report.

27 **CONCLUSION**

28 Fish have no part in the argument between beneficial users. To a fish there is only one question:
is there sufficient water to live in good condition?

The law provides and the court has held that the duty to bypass sufficient water falls upon the
dam owner. The same duty will fall on any dam owner, so to the interests of fish, who owns the
diversions is irrelevant. The Preliminary Injunction did not seek to resolve a century of feuding
between irrigation interests and the City, but rather to protect existing conditions and establish initial

1 environmental and public trust flows. This work will provide a solid foundation for long-term
2 remediation of the river.

3 KCWA and Real Parties argue that the City has used this litigation to obtain unfair advantage in
4 this litigation. But the fish demand only sufficient water to stay in good condition, and Plaintiffs
5 reassert that demand now. While KCWA and Real Parties seek reconsideration and stay of both the
6 Preliminary Injunction Order and the subsequent Implementation Order, it is clear that their conflict is
7 with the City's prioritizing its rights and the City's determination of its rights, not with the flows
8 dedicated to keeping the fish in good condition. Reconsideration or stay of either order is not
9 appropriate for resolving that dispute; KCWA and Real Parties should have sought modification of the
10 Implementation Order instead. Because KCWA and Real Parties have submitted no new fact, law or
11 circumstance, their motions should be denied.

12 Respectfully,

13 DATED: December 8, 2023

LAW OFFICE OF ADAM KEATS, PC

14 

15

Adam Keats
16 *Attorney for Bring Back the Kern, Kern River*
17 *Parkway Foundation, Kern Valley Audubon,*
18 *Sierra Club, Center for Biological Diversity*

19 DATED: December 8, 2023

WATER AUDIT CALIFORNIA

20 

21

William McKinnon
22 *Attorney for Water Audit California*

1 PROOF OF SERVICE

2
3 I, Valerie Stephan, declare:

4 I am a resident of Lincoln County, Oregon. I am over the age of eighteen years and not a
5 party to the within action. My business address is 952 School Street, #316, Napa, California 94559.

6 On December 8, 2023, I served a copy of the within document(s):

7 PLAINTIFFS’ COMBINED OPPOSITION TO KCWA’S AND REAL PARTIES’
8 MOTIONS FOR RECONSIDERATION AND STAY

9 X by transmitting via e-mail or electronic transmission the document(s) listed above
10 to the person(s) at the e-mail address(es) set forth below.

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7
8 I declare the foregoing to be true, subject to the penalty of perjury. Executed on
9 December 8, 2023 at Lincoln City, Oregon.

10 

11 Valerie M. Stephan
12 Valerie Stephan
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