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CHINO BASIN WATERMASTER

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN BERNARDINO

10
11 CHINO BASIN MUNICIPAL WATER
12 DISTRICT,

13 Plaintiff,

14 v.

15 CITY OF CHINO, et al.,

16 Defendants.

Case No. RCV RS 51010

[Assigned for All Purposes to the
Honorable Gilbert Ochoa]

**WATERMASTER OBJECTIONS TO
SUPPLEMENTAL DECLARATION OF
COURTNEY JONES IN SUPPORT OF
MOTION CHALLENGING
WATERMASTER'S BUDGET ACTION
TO FUND UNAUTHORIZED CEQA
REVIEW**

Date: October 14, 2022

Time: 9:00 a.m.

Dept: S24

[Filed concurrently herewith: Declaration of
Peter Kavounas; Motion to Strike
Supplemental Declaration of Courtney
Jones and Reply in Support of Motion
Challenging Watermaster's Budget Action
to Fund Unauthorized CEQA Review;
[Proposed] Order Granting Watermaster
Motion to Strike; Declaration of Peter
Kavounas]

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1 COMES NOW, Chino Basin Watermaster (“Watermaster”) and submits these objections
2 to the Supplemental Declaration of Courtney Jones in Support of Motion Challenging
3 Watermaster’s Budget Action to Fund Unauthorized CEQA Review. In addition to the specific
4 objections set forth below, Watermaster objects to the supplemental declaration generally in that
5 the declaration raises new facts, arguments, and evidence, not previously raised in the initial
6 motion or declaration. “The general rule of motion practice...is that new evidence is not
7 permitted with reply papers.” (*Jay v. Mahaffey* (2013) 218 Cal.App.4th 1522, 1537.) A party’s
8 decision “to wait until the reply briefs to bring forth...evidence...when the [responding party]
9 would have no opportunity to respond...[is] simply unfair.” (*Id.*, citations omitted.) “A trial court
10 [has] discretion whether to accept new evidence with the reply papers.” (*Alliant Ins. Services, Inc.*
11 *v. Gaddy* (2008) 159 Cal.App.4th 1292, 1308.) “[T]he inclusion of additional evidentiary matter
12 with the reply should only be allowed in the exceptional case...” (*Carbajal v. CWPSC, Inc.*
13 (2016) 245 Cal.App.4th 227, 241, citation omitted.)

14 Moving Parties introduce two new exhibits that were not previously submitted in
15 conjunction with their initial motion. Moving Parties additionally introduce new factual and legal
16 arguments not contemplated or discussed in neither its initial motion or in the oppositions.
17 Crucially, Exhibit B does not include the attachments to the staff report nor does it include the
18 agenda in which the staff report appears, excluding contradictory or contextual information and
19 thus misrepresenting the nature of Watermaster’s statements and actions.

20 Moving Parties fail to explain or illustrate any good cause for introducing the documents
21 and both the legal and factual arguments now, and not previously. Generally, courts have the
22 discretion to consider new arguments raised or the first time in reply briefs, but ordinarily will not
23 consider them unless there is “good cause” for doing so. (*Larson v. UHS of Rancho Springs, Inc.*
24 (2014) 230 Cal.App.4th 336, 352-53; *Shimmon v. Franchise Tax Bd.* (2010) 189 Cal.App.4th
25 688, 694; *Neighbours v. Buzz Oates Enterprizes* (1990) 217 Cal.App.3d 325, 335.) If a court does
26 not find “good cause” for considering a “reply” argument, then fairness dictates that the court
27 give the opposing party an opportunity to fully respond to that argument. (*See, e.g., Thornton v.*
28 *California Unemployment Ins. Appeals Bd.* (2012) 204 Cal.App.4th 1403, 1421; *American Drug*

1 *Stores, Inc. v. Stroh* (1992) 10 Cal.App.4th 1446, 1453.) The same general rule applies to “reply”
2 evidence. (*See, e.g., Wall Street Network, Ltd. v. New York Times Co.* (2008) 164 Cal.App. 4th
3 1171, 1183)

4 In addition to the above, the supplemental declaration lacks foundation (Evid. Code § 403)
5 and is filled with irrelevant content (Evid. Code §§ 201 and 350). Importantly, the supplemental
6 declaration misstates the evidence and fails to include all relevant information, misleading the
7 Court. (Cal. Evid. Code §§ 210, 403, 356.) The testimony contained therein attempts to usurp the
8 role of the Court in deciding the merits of this motion by improperly applying the law to the facts.
9 (*Amtower v. Photon Dynamics, Inc.* (2008) Cal.App.4th 1582, 1598-99.)

10 Watermaster also objects on the ground that the supplemental declaration sets forth
11 conclusions, opinions, or ultimate facts, which are insufficient. (Lack of personal knowledge,
12 Evid. Code § 702; Not qualified as an expert §§ 720 and 801; Opinion based upon improper
13 matter § 803.) Additionally, Watermaster objects to the declaration as being impermissibly
14 speculative, and therefore irrelevant. (*People v. Morrison* (2004) 34 Cal.App.4th 698, 711.) To
15 the extent that this testimony attempts to constitute competent oral evidence or an opinion on an
16 ultimate issue, it makes unfounded conclusions violating Evidence Code sections 400 *et seq.* and
17 800 *et seq.*, and should be excluded because the testimony is more prejudicial than probative.
18 (Evid. Code § 352.) Watermaster further objects to the declaration on the grounds that the
19 information contained therein is Hearsay, Evid. Code §§ 1200 *et seq.*

20 **OBJECTIONS TO SUPPLEMENTAL DECLARATION OF COURTNEY JONES**

MATERIALS OBJECTED TO: Supplemental Declaration of Courtney Jones	GROUNDS FOR OBJECTION	COURT’S RULING:
3. I participated in Ontario’s submission of its alternative advanced water treatment proposal to Watermaster for consideration for inclusion in a proposed project description of the OBMPU. Regional water supply is another project description that Ontario	A. Irrelevant and Prejudicial (Cal. Evid. Code §§ 210, 350, 352) B. Incomplete (Cal. Evid. Code § 356)	SUSTAINED _____ OVERRULED _____

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MATERIALS OBJECTED TO: Supplemental Declaration of Courtney Jones	GROUNDS FOR OBJECTION	COURT'S RULING:
submitted to Watermaster for the OBMPU process. ¹		
4. Watermaster initially took the position that the OBMPU's corresponding Implementation Plan and Peace Agreement amendment would move forward in parallel with the OBMPU, but later changed that position after Monte Vista Water District requested a brief 30-day pause in the process related to the COVID-19 public health emergency. After the pause, Watermaster stopped conducting meetings to facilitate this process of developing agreements while continuing to pursue CEQA review of the 2020 OBMPU Report.	<p>A. Lack of Foundation/No Personal Knowledge (Cal. Evid. Code §§ 702(a), 800)</p> <p>B. Inadmissible Speculation and Conclusions (Cal. Evid. Code §§ 400, 403, 410; <i>Lyons v. Security Pacific National Bank</i> (1995) 40 Cal.App.4th 1001, 1014)</p> <p>C. Inadmissible Hearsay (Cal. Evid. Code § 1200)</p> <p>D. Misstates the Testimony (Cal. Evid. Code §§ 210, 403)</p> <p>E. Incomplete (Cal. Evid. Code § 356)</p> <p>F. Best (Secondary) Evidence Rule (Cal. Evid. Code §§ 1520-23)</p>	<p>SUSTAINED _____</p> <p>OVERRULED _____</p>
5. Attached hereto as Exhibit "A" are pages excerpted from a true and correct copy of Watermaster's Summary of Engineering Services and Costs for the Fiscal Year 2022/23 Budget, which reflects Watermaster's formerly held position that "... to implement the 2020 OBMP Update, the parties must update the 2000 OBMP Implementation Plan and amend the Peace Agreement."	<p>A. Lack of Foundation/No Personal Knowledge (Cal. Evid. Code §§ 702(a), 800)</p> <p>B. Inadmissible Speculation and Conclusions (Cal. Evid. Code §§ 400, 403, 410; <i>Lyons v. Security Pacific National Bank</i> (1995) 40 Cal.App.4th 1001, 1014)</p> <p>C. Improper Legal Conclusion (<i>Hayman v. Block</i> (1986) 176 Cal.App.3d 629, 638-39 ["affidavits must cite evidentiary facts, not legal conclusions or 'ultimate' facts"])</p> <p>D. Misstates the Testimony (Cal. Evid. Code §§ 210, 403)</p>	<p>SUSTAINED _____</p> <p>OVERRULED _____</p>

¹ Watermaster notes that Moving Parties do not cite to paragraph 3 in the Reply.

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MATERIALS OBJECTED TO: Supplemental Declaration of Courtney Jones	GROUNDS FOR OBJECTION	COURT'S RULING:
	<p>E. Incomplete (Cal. Evid. Code § 356)</p> <p>F. Inadmissible Hearsay (Cal. Evid. Code § 1200)</p> <p>G. Best (Secondary) Evidence Rule (Cal. Evid. Code §§ 1520-23) (This statement attempts to impermissibly characterize the content of a document in violation of Evid. Code § 1521 and Evid. Code § 412)</p> <p>H. Attempts to usurp the role of the Court in deciding the merits of the case, and improperly applies law to particular facts. (<i>Amtower v. Photon Dynamics, Inc.</i>, (2008) Cal.App.4th 1582, 1598-99)</p> <p>I. Fails to show “good cause” for introduction of evidence in reply and not in the moving papers (<i>Larson v. UHS of Rancho Springs, Inc.</i> (2014) 230 Cal.App.4th 336, 352-53; <i>Shimmon v. Franchise Tax Bd.</i> (2010) 189 Cal.App.4th 688, 694; <i>Neighbours v. Buzz Oates Enterprises</i> (1990) 217 Cal.App.3d 325, 335)</p>	
<p>6. In light of my familiarity with Watermaster's annual budget process and regular attendance at budget-related meetings, I am informed and believe that in connection with Watermaster's 2017 and 2019 (certified in 2021) addenda to the Programmatic Environmental Impact Report ("PEIR") for the Local Storage Limitation Solution ("LSLS"), approval and funding of CEQA</p>	<p>A. Lack of Foundation/No Personal Knowledge (Cal. Evid. Code §§ 702(a), 800)</p> <p>B. Inadmissible Speculation and Conclusions (Cal. Evid. Code §§ 400, 403, 410; <i>Lyons v. Security Pacific National Bank</i> (1995) 40 Cal.App.4th 1001, 1014)</p> <p>C. Inadmissible Hearsay (Cal. Evid. Code § 1200)</p>	<p>SUSTAINED _____</p> <p>OVERRULED _____</p>

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MATERIALS OBJECTED TO: Supplemental Declaration of Courtney Jones	GROUNDS FOR OBJECTION	COURT'S RULING:
<p>environmental consultants, Tom Dodson & Associates, went through the Watermaster budget approval process in and had unanimous consent of public agency parties to the Judgment and Peace Agreement. I personally participated in this Watermaster budget approval process for the Tom Dodson & Associates environmental consulting contract in December 2019. Ontario supported approval of the Dodson contract, along with other public agency parties, but only in reliance on an understanding that CEQA environmental review would be performed on the OBMP Implementation Plan and Peace Agreement update--not the 2020 OBMPU Report.</p>	<p>D. Misstates the Testimony (Cal. Evid. Code §§ 210, 403)</p> <p>E. Irrelevant and Prejudicial (Cal. Evid. Code §§ 210, 350, 352)</p> <p>F. Attempts to usurp the role of the Court in deciding the merits of the case, and improperly applies law to particular facts. (<i>Amtower v. Photon Dynamics, Inc.</i>, (2008) Cal.App.4th 1582, 1598-99)</p> <p>G. Best (Secondary) Evidence Rule (Cal. Evid. Code §§ 1520-23) (This statement attempts to impermissibly characterize the content of a document in violation of Evid. Code § 1521 and Evid. Code § 412)</p> <p>H. Fails to show "good cause" for introduction of evidence in reply and not in the moving papers (<i>Larson v. UHS of Rancho Springs, Inc.</i> (2014) 230 Cal.App.4th 336, 352-53; <i>Shimmon v. Franchise Tax Bd.</i> (2010) 189 Cal.App.4th 688, 694; <i>Neighbours v. Buzz Oates Enterprises</i> (1990) 217 Cal.App.3d 325, 335)</p>	
<p>7. Attached hereto as Exhibit "B" is a true and correct copy of a Watermaster Staff Report dated December 12, 2019, which reflects Watermaster's formerly held position that environmental review would be conducted on the OBMP Implementation Plan--not the 2020 OBMPU Report.</p>	<p>A. Lack of Foundation/No Personal Knowledge (Cal. Evid. Code §§ 702(a), 800)</p> <p>B. Inadmissible Speculation and Conclusions (Cal. Evid. Code §§ 400, 403, 410; <i>Lyons v. Security Pacific National Bank</i> (1995) 40 Cal.App.4th 1001, 1014)</p>	<p>SUSTAINED _____</p> <p>OVERRULED _____</p>

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MATERIALS OBJECTED TO: Supplemental Declaration of Courtney Jones	GROUNDS FOR OBJECTION	COURT'S RULING:
	<p>C. Improper Legal Conclusion (<i>Hayman v. Block</i> (1986) 176 Cal.App.3d 629, 638-39 ["affidavits must cite evidentiary facts, not legal conclusions or 'ultimate' facts"])</p> <p>D. Misstates the Testimony (Cal. Evid. Code §§ 210, 403)</p> <p>E. Incomplete (Cal. Evid. Code § 356)</p> <p>F. Inadmissible Hearsay (Cal. Evid. Code § 1200)</p> <p>G. Best (Secondary) Evidence Rule (Cal. Evid. Code §§ 1520-23) (This statement attempts to impermissibly characterize the content of a document in violation of Evid. Code § 1521 and Evid. Code § 412)</p> <p>H. Attempts to usurp the role of the Court in deciding the merits of the case, and improperly applies law to particular facts. (<i>Amtower v. Photon Dynamics, Inc.</i>, (2008) Cal.App.4th 1582, 1598-99)</p> <p>I. Fails to show "good cause" for introduction of evidence in reply and not in the moving papers (<i>Larson v. UHS of Rancho Springs, Inc.</i> (2014) 230 Cal.App.4th 336, 352-53; <i>Shimmon v. Franchise Tax Bd.</i> (2010) 189 Cal.App.4th 688, 694; <i>Neighbours v. Buzz Oates Enterprizes</i> (1990) 217 Cal.App.3d 325, 335)</p>	

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MATERIALS OBJECTED TO: Supplemental Declaration of Courtney Jones	GROUNDS FOR OBJECTION	COURT'S RULING:
<p>8. Unlike the OBMPU process, which is expected to include amendments to the OBMP Implementation Plan and amend the Peace Agreement (see, e.g., Exhibit A hereto), the PEIR for the LSLs did not involve any update to the OBMP Implementation Plan and the Peace Agreement.</p>	<p>A. Lack of Foundation/No Personal Knowledge (Cal. Evid. Code §§ 702(a), 800)</p> <p>B. Inadmissible Speculation and Conclusions (Cal. Evid. Code §§ 400, 403, 410; <i>Lyons v. Security Pacific National Bank</i> (1995) 40 Cal.App.4th 1001, 1014)</p> <p>C. Improper Legal Conclusion (<i>Hayman v. Block</i> (1986) 176 Cal.App.3d 629, 638-39 ["affidavits must cite evidentiary facts, not legal conclusions or 'ultimate' facts"])</p> <p>D. Misstates the Testimony (among others, as paragraph 6 of this same declaration states, an addendum, not a PEIR, was completed for environmental review of the LSLs) (Cal. Evid. Code §§ 210, 403)</p> <p>E. Incomplete (Cal. Evid. Code § 356)</p> <p>F. Best (Secondary) Evidence Rule (Cal. Evid. Code §§ 1520-23) (This statement attempts to impermissibly characterize the content of a document in violation of Evid. Code § 1521 and Evid. Code § 412)</p> <p>G. Attempts to usurp the role of the Court in deciding the merits of the case, and improperly applies law to particular facts. (<i>Amtower v. Photon Dynamics, Inc.</i>, (2008) Cal.App.4th 1582, 1598-99)</p>	<p>SUSTAINED _____</p> <p>OVERRULED _____</p>

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	H. Fails to show "good cause" for introduction of evidence in reply and not in the moving papers (<i>Larson v. UHS of Rancho Springs, Inc.</i> (2014) 230 Cal.App.4th 336, 352-53; <i>Shimmon v. Franchise Tax Bd.</i> (2010) 189 Cal.App.4th 688, 694; <i>Neighbours v. Buzz Oates Enterprizes</i> (1990) 217 Cal.App.3d 325, 335)	

Dated: October 11, 2022

BROWNSTEIN HYATT FARBER
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By: 

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24774280.1

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 within action. My business address is Chino Basin Watermaster, 9641 San Bernardino Road, Rancho Cucamonga, California 91730; telephone (909) 484-3888.

On October 11, 2022 I served the following:

1. WATERMASTER OBJECTIONS TO SUPPLEMENTAL DECLARATION OF COURTNEY JONES IN SUPPORT OF MOTION CHALLENGING WATERMASTER'S BUDGET ACTION TO FUND UNAUTHORIZED CEQA REVIEW

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

See attached service list: Master Email Distribution List

/ 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.

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

Executed on October 11, 2022 in Rancho Cucamonga, California.



By: Ruby Favela Quintero
Chino Basin Watermaster

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