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10 Attorneys for State Water Contractors

11
12 **BEFORE THE**
13 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

14 ENFORCEMENT ACTION ENF01949 -
15 DRAFT CEASE AND DESIST ORDER
16 REGARDING UNAUTHORIZED OR
17 THREATENED UNAUTHORIZED
DIVERSIONS OF WATER FROM OLD RIVER
IN SAN JOAQUIN

DECLARATION OF JOLIE-ANNE S.
ANSLEY IN SUPPORT OF MOTION
TO QUASH SUBPOENAS DUCES
TECUM TO CHANDRA CHILMAKURI
AND KYLE WINSLOW, OR, IN THE
ALTERNATIVE, MOTION FOR
PROTECTIVE ORDER

18 In the Matter of ENFORCEMENT ACTION
19 ENF01951 - ADMINISTRATIVE CIVIL
20 LIABILITY COMPLAINT REGARDING
21 UNAUTHORIZED DIVERSION OF WATER
22 FROM THE INTAKE CHANNEL TO THE
BANKS PUMPING PLANT (FORMERLY
ITALIAN SLOUGH) IN CONTRA COSTA
COUNTY

23
24 I, Jolie-Anne S. Ansley, do hereby declare:

25 1. I am an attorney at law licensed to practice before the courts of the State of
26 California, and a partner with the law firm of Duane Morris LLP. I am the attorney with
27 primary responsibility for this matter in my firm, and am familiar with the above-referenced
28

1 proceedings and all documents related thereto, including all notices, rulings and filings. I
2 have personal knowledge of the matters stated herein, except as to matters herein stated
3 on information and belief, and as to those matters I believe them to be true, and if called
4 upon could competently testify thereto.

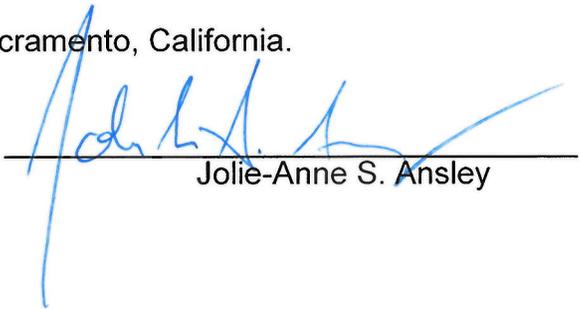
5 2. Attached hereto as Exhibit 1 is a true and correct copy of the subpoena duces
6 tecum to Chandra Chilmakuri issued on February 24, 2016 by attorney Michael Vergara on
7 behalf of Byron-Bethany Irrigation District, which I am informed and believe was served on
8 Chandra Chilmakuri on February 25, 2016.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of the of the subpoena
10 duces tecum to Kyle Winslow issued on February 24, 2016 by attorney Michael Vergara on
11 behalf of Byron-Bethany Irrigation District, which I am informed and believe was served on
12 Kyle Winslow on February 29, 2016.

13 4. On February, 29, 2016, on behalf of SWC, I sent an email to Michael Vergara
14 and Daniel Kelly, attorneys for Byron-Bethany Irrigation District requesting a telephonic
15 meet-and-confer concerning the issues raised by the subpoenas duces tecum to Chandra
16 Chilmakuri and Kyle Winslow. A true and correct copy of the email dated February 29,
17 2016 from Jolie-Anne Ansley to Michael Vergara and Daniel Kelly is attached hereto as
18 Exhibit 3. On February 29, 2016 at approximately 4 p.m., Mr. Kelly, Mr. Vergara and I held
19 a meet-and-confer conference call. No resolution was reached between the parties.

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

22 Executed on 2 day of March, 2016 in Sacramento, California.

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24 
25 _____
26 Jolie-Anne S. Ansley

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