



**SAN LUIS OBISPO COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT**
Department of Public Works
John Diodati, Interim Director

TIME SENSITIVE LEGAL NOTICE

DATE: April 12, 2018

RE: *Steinbeck v. County of San Luis Obispo., et al.*,
Superior Court, County of Santa Clara, Case. No. 1-14-CV-265039
Hearing on Motion to Compel Production of Confidential Well Information

PLEASE TAKE NOTICE that on **Friday, April 27, 2018**, at **10:00 a.m.**, or as soon thereafter as the matter may be heard, in **Department 19** of the Superior Court of California, Santa Clara County, located at **191 North First Street, San Jose, California 95113**, a hearing will be held on the Motion to Compel filed by Plaintiffs in the above-referenced action asking the Court to compel the San Luis Obispo County Flood Control and Water Conservation District ("District"), the County of San Luis Obispo ("County"), and other defendants and non-parties to produce certain well information. The Motion to Compel can be viewed at:

<https://www.slocountywater.org/site/Water%20Resources/Water%20Forum/>

Among the information Plaintiffs seek to obtain through this Motion to Compel, and through their prior requests to the District and County, is all data regarding wells within the Paso Robles Groundwater Basin and/or Watershed collected by the District as part of the District's Groundwater Level Measuring Program ("Program"), including but not limited to historic water levels and the location of each such well. As the District and the County obtained much of this information subject to the conditional consent of the well owners participating in the Program, and many well owners consented to the collection and use of such data on the condition that neither the District nor any other governmental agency release the information obtained to any private individuals, the District and County have objected to requests for, and have refused to produce, data subject to such conditional consents. To the extent any such information has been inadvertently produced in the exchange of electronically stored information in the course of the discovery process, the District and the County are taking appropriate measures to ensure its continued confidentiality. The District and the County will oppose Plaintiffs' Motion to Compel. In the alternative, if the Court rejects the District and County's objections and grants Plaintiffs' Motion to Compel, the District and County will ask the Court to enter a protective order designed to shield as much individual well information and data as possible from public disclosure. The District and County will file a joint opposition brief to the Motion to Compel on April 13, 2018.

Based upon our records, we believe you are the owner of one or more wells in the Program for which information has been requested by Plaintiffs. Please be advised that although the District and County will make every effort to keep confidential the well data and information made conditionally available to the District and County, if the Court grants Plaintiffs' Motion to Compel and orders the District and County to disclose information regarding your well(s), the District and County must comply.

File: CF 570.95.01

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Department of Public Works

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