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CAVALIERE; DONNA CORSON; ISRAEL PERLA; and CHARLES SHARP

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

8 **COUNTY OF YUBA**

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10 MARIEKE FURNEE, GIDEON BEINSTOCK;
11 JEANETTE CAVALIERE; DONNA CORSON;
12 ISRAEL PERLA; and CHARLES SHARP

13 Petitioner/Plaintiff,

14 v.

15 THE NORTH YUBA WATER DISTRICT, and
16 DOES 1 through 100, inclusive,

17 Respondents/Defendants.

18 YOUNG LIFE, INC. a/k/a YOUNG LIFE
19 CAMPAIGN, INC., a Texas Corporation,

20 Real Party in Interest.
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Case No.

DECLARATION OF DONNA CORSON

Date: May 5, 2021

Time: 8:30 a.m.

Dept.: 4

Judge: Honorable Stephen W. Berrier

1 I, Donna Corson, hereby declare as follows:

2 1. I am over eighteen (18) years of age, and resident of Dobbins, CA. I have personal
3 knowledge of the facts set forth herein, and, if called as a witness, I could and would competently
4 testify thereto.

5 2. I am one of Defendant/Respondent North Yuba Water District's ("NYWD") customers
6 for agricultural water.

7 3. NYWD's failure to provide a reliable supply of water has caused the loss of
8 approximately six (6) fruit-bearing trees and approximately fifty percent (50%) of the landscaping
9 near my home.

10 4. The loss of landscaping puts my home at serious risk of succumbing to a wildfire,
11 which are increasingly more likely in years of drought. Last year, in 2020, when there was some
12 irrigation, we were recommended to evacuate but were able to stay because we had water in case of an
13 emergency.

14 5. My home is equipped with one-quarter (1/4) mile of two-inch pipe for fire suppression.
15 With water in the ditch, we are easily capable of mounting a significant defense. However, when there
16 is no water in the ditch, we are forced to rely on our well, which cannot even fully irrigate our
17 landscaping, and is completely incapable of providing the pressure needed to fight a fire.

18 6. In addition to my own defense, the pond on my property which is normally filled by
19 irrigation water is large enough for Cal Fire helicopters to extract water for fighting larger fires. The
20 pond has been used for this purpose on several occasions. Without the water from NYWD, Cal Fire
21 will have to look elsewhere for a sufficiently filled and sizeable source and the community will be
22 deprived of a significant and resource.

23 7. On April 20, 2021, I wrote to NYWD expressing these concerns, but have not received
24 any response.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing is
26 true and correct and that this declaration was executed in Fresno, California on April 26, 2021.
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