

1 John P. Kinsey #215916
2 Giulio A. Sanchez #317329
3 **WANGER JONES HELSLEY PC**
4 265 East River Park Circle, Suite 310
5 Fresno, California 93720
6 Telephone: (559) 233-4800
7 Facsimile: (559) 233-9330
8 Email: jkinsey@wjhattorneys.com
9 gsanchez@wjhattorneys.com

10 Attorneys for: Petitioners/Plaintiffs MARIEKE FURNEE, GIDEON BEINSTOCK; JEANETTE
11 CAVALIERE; DONNA CORSON; ISRAEL PERLA; and CHARLES SHARP

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF YUBA**

14 MARIEKE FURNEE, GIDEON BEINSTOCK;
15 JEANETTE CAVALIERE; DONNA CORSON;
16 ISRAEL PERLA; and CHARLES SHARP

17 Petitioner/Plaintiff,

18 v.

19 THE NORTH YUBA WATER DISTRICT, and
20 DOES 1 through 100, inclusive,

21 Respondents/Defendants.

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

Real Party in Interest.

Case No.

DECLARATION OF KAROLYN MCCALL

Date: May 5, 2021

Time: 8:30 a.m.

Dept: 4

Judge: Honorable Stephen W. Berrier

1 I, Karolyn McCall, hereby declare as follows:

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

5 2. I am one of Defendant/Respondent North Yuba Water District's ("NYWD") customers
6 for agricultural water. I depend on NYWD's irrigation water to maintain my 143-acre sheep
7 operation.

8 3. I purchased my property for its unique class one soil and large meadows. With this
9 type of soil and large meadows I should only need to utilize hay 40-60 days a year. With the lack of
10 water, however, I have to feed with hay for nearly half of the year.

11 4. As a direct result of the lack of water, I have also lost an irreplaceable ewe. The ewe
12 died when she crawled into a pond that she normally drank from, but she became entrapped in what
13 now is a sea of mud. The water that normally kept the pond full would have allowed her to walk
14 safely to the edge to get a drink. This ewe was the product of flying frozen fertilized eggs out of
15 Australia, obtained from a breed that can no longer be directly imported from their country of origin,
16 South Africa.

17 5. The death of the ewe, itself, was not the only impact. The ewe was of special genetic
18 stock, capable of producing significantly more meat than the typical sheep. The ewe was an
19 investment in the future of my business, and, as a result of the unreliable supply of water provided by
20 NYWD, this investment was lost.

21 6. Additionally, I have lost many trees, including 22 huge ponderosa pine trees and old
22 oaks, thereby losing shade to my property and diminishing its value.

23 7. Last year, due to the fires, I had to evacuate my property. If we had had sufficient
24 water for fire suppression, I would not have had to do so. When evacuating my property, I had to
25 leave 100 head of sheep to fend for themselves. Because the risk of wildfires is constant around my
26 property, there is a high chance that a fire will erupt again. Without NYWD's water, I will again be
27 forced to evacuate and leave my livestock behind.
28

