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Gov. Code § 6103**

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14 *Attorneys for Plaintiff, the People of the State of California*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **COUNTY OF LOS ANGELES**

17 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

18 Plaintiff,

19 vs.

20 SOUTHERN CALIFORNIA GAS  
COMPANY, and DOES 1-50, inclusive,

21 Defendants.  
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Case No. BC602973 (Consolidated with Lead  
Case No. BC601844 and Case Nos.  
BC603602, BC604099, BC604353,  
BC604414, BC604592, BC605084,  
BC605085, BC605173, BC605406,  
BC605407, BC605892, 606427, BC606555,  
606844, 606941, 607057, 607347, 607540,  
607541, 607841, 607542, 607697, 607839,  
and 607840)

**STIPULATION AND [PROPOSED]  
ORDER FOR LEAVE TO AMEND  
THE PEOPLE'S COMPLAINT**

25 **AND RELATED CONSOLIDATED  
26 CASES.**  
27  
28

1 MARY C. WICKHAM, County Counsel  
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GRACE Chang, Principal Deputy County Counsel  
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6 *Attorneys for Plaintiff, the People of the State of California*

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1 **STIPULATION**

2 Plaintiff, the People of the State of California (“the People”), represented by Kamala D.  
3 Harris, Attorney General, in her independent capacity and on behalf of the California Air  
4 Resources Board, the City of Los Angeles City Attorney’s Office, and County Counsel for the  
5 County of Los Angeles; and Defendant, the Southern California Gas Company (“Defendant”), by  
6 and through their undersigned counsel of record, hereby stipulate and agree, subject to Court  
7 approval, as follows.

8 WHEREAS, on December 7, 2015, the Los Angeles City Attorney, Michael N. Feuer  
9 (“City Attorney”), filed a Complaint on behalf of the People in the above entitled action (Case  
10 No. BC602973) against Defendant.

11 WHEREAS, on January 8, 2016, the People filed a First Amended Complaint joining the  
12 County of Los Angeles, by and through Mary C. Wickham, County Counsel, as a plaintiff to the  
13 public nuisance claim.

14 WHEREAS, on December 30, 2015, the Court ordered the People’s case consolidated with  
15 Case No. BC601844, *Gandsey v. Southern California Gas Company*, subject to bifurcation at  
16 trial. Case No. BC601844 was designated as the lead case.

17 WHEREAS, Attorney General Kamala D. Harris, (“Attorney General”) is authorized by  
18 Government Code section 12606 to intervene in this matter on behalf the People and file  
19 independent causes of action against Defendant.

20 WHEREAS, the California Air Resources Board (“ARB”), acting by and through its  
21 counsel the Attorney General, is authorized to bring an action against Defendant on behalf of the  
22 People for enforcement of air pollution control laws.

23 WHEREAS, the People wish to have one combined complaint in lieu of multiple  
24 complaints pending on behalf of the People to promote efficiency and economy of the Court and  
25 the parties. Therefore, the People seek leave to file a Second Amended Complaint, which adds  
26 claims brought by the Attorney General, in her independent capacity and on behalf of ARB,  
27 against Defendant. The Second Amended Complaint was lodged concurrently with this  
28 Stipulation. A true and correct copy of the Second Amended Complaint is attached as Exhibit 1.

1 WHEREAS, Defendant has agreed not to oppose the People's request to file a Second  
2 Amended Complaint.

3 WHEREAS, the Parties agree that the Court's Dec. 30, 2015 Order re Complex  
4 Determination; Notice of Order of Consolidation of Cases does not prohibit the Court from  
5 granting the People's request for leave to amend.

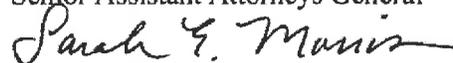
6 IT IS THEREFORE HEREBY DECLARED, STIPULATED, AND AGREED BY THE  
7 PARTIES TO THIS ACTION, AS FOLLOWS:

8 1. The Parties request that the Court grant the People leave to file a Second Amended  
9 Complaint, deem the Second Amended Complaint filed as of the date of entry of this Order, and  
10 order the People to serve the Second Amended Complaint within fifteen days of the date of notice  
11 of entry of this Order.

12  
13 Dated: February 1, 2016

Respectfully Submitted,

14 KAMALA D. HARRIS  
15 Attorney General of California  
16 SALLY MAGNANI  
17 ROBERT W. BYRNE  
18 Senior Assistant Attorneys General

  
17 SARAH E. MORRISON  
18 Supervising Deputy Attorney General

19 *Attorneys for Plaintiff the People of the State of*  
20 *California*

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Dated: February 1, 2016

MICHAEL N. FEUER, City Attorney  
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TINA L. HESS, Assistant City Attorney  
JESSICA B. BROWN, Deputy City Attorney  
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CRIMINAL BRANCH  
COMPLEX & SPECIAL LITIGATION SECTION



JESSICA B. BROWN  
Deputy City Attorney

*Attorneys for Plaintiff the People of the State of California*

Dated: February 1, 2016

MARY C. WICKHAM  
County Counsel  
COUNTY OF LOS ANGELES

  
DUSAN PAVLOVIC  
Senior Deputy County Counsel

*Attorneys for Plaintiff the People of the State of California*

Dated: February \_\_, 2016

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Deanne L. Miller  
Yardena R. Zwang-Weissman

By \_\_\_\_\_  
Deanne L. Miller

*Attorneys for Defendant*  
SOUTHERN CALIFORNIA GAS COMPANY

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Dated: February \_\_, 2016

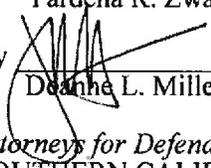
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Dated: February \_\_, 2016

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*Attorneys for Defendant*  
SOUTHERN CALIFORNIA GAS COMPANY

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**[PROPOSED] ORDER**

Having reviewed the foregoing Stipulation by and among the People and Defendants, IT IS HEREBY ORDERED AS FOLLOWS:

- 1. The People’s request for leave to file a Second Amended Complaint is hereby GRANTED.
- 2. The Second Amended Complaint is deemed filed as of the date of entry of this Order.
- 3. The People shall serve the Second Amended Complaint within fifteen days of the date of notice of entry of this Order.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT