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19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN FRANCISCO DIVISION**

22 The COUNTY OF SAN MATEO, individually  
23 and on behalf of THE PEOPLE OF THE  
STATE OF CALIFORNIA,

24 Plaintiff,

25 v.

26 CHEVRON CORP., et al.,

27 Defendants.

CASE NO. 3:17-cv-04929-VC

**STATEMENT REGARDING  
ADMINISTRATIVE MOTION TO  
RELATE CASES**

Judge: Hon. Vince Chhabria

28 **STATEMENT REGARDING ADMINISTRATIVE MOTION TO RELATE CASES**  
**CASE NOS. 3:17-cv-04929-VC, 3:17-cv-04934-VC, 3:17-cv-04935-VC**

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THE CITY OF IMPERIAL BEACH, a  
municipal corporation, individually and on  
behalf of THE PEOPLE OF THE STATE OF  
CALIFORNIA,  
  
Plaintiff,  
  
v.  
  
CHEVRON CORP., et al.,  
  
Defendants.

CASE NO. 3:17-cv-04934-VC

THE COUNTY OF MARIN, individually and  
on behalf of THE PEOPLE OF THE STATE  
OF CALIFORNIA,  
  
Plaintiff,  
  
v.  
  
CHEVRON CORP., et al.,  
  
Defendants.

CASE NO. 3:17-cv-04935-VC

1 San Mateo County, Marin County, and the City of Imperial Beach (collectively, “San  
 2 Mateo Plaintiffs”) take no position on Defendants’ Administrative Motion to Relate Cases.<sup>1</sup>  
 3 Insofar as the matters raised in that motion and in the Cities of San Francisco and Oakland’s  
 4 Joint Response in Opposition<sup>2</sup> bear on the San Mateo Plaintiffs’ pending Motion to Remand,<sup>3</sup>  
 5 however, the San Mateo Plaintiffs disagree that these are accurate depictions of their complaints.  
 6 For example, San Francisco and Oakland state that the San Mateo Plaintiffs’ complaints  
 7 “implicate” the foreign affairs doctrine and activities occurring within the federal enclave. Dkt.  
 8 No. 171 at 4. As explained in the San Mateo Plaintiffs’ Motion to Remand, the facts asserted by  
 9 the San Mateo Plaintiffs support well-pleaded state law claims and do not implicate significant  
 10 federal issues. *See, e.g.*, Dkt. No. 157 at 24. For the reasons described in the pending Motion to  
 11 Remand, none of the issues described in San Francisco’s and Oakland’s response provides  
 12 jurisdiction in this Court.

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Dated: November 6, 2017

**OFFICE OF THE COUNTY COUNSEL  
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<sup>1</sup> ECF Dkt. No. 170.  
<sup>2</sup> ECF Dkt. No. 171.  
<sup>3</sup> ECF Dkt. No. 157.

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