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13 Attorneys for Defendant
CONOCOPHILLIPS COMPANY
14

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 THE PEOPLE OF THE STATE OF
19 CALIFORNIA, acting by and through the
Oakland City Attorney BARBARA J. PARKER,
20

Plaintiff and Real Party in Interest,
21

v.
22

BP P.L.C., *et al.*,
23

Defendants.
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25
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27
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Case No. 3:17-cv-06011-WHA
Related Case: 3:17-cv-06012-WHA

**CONOCOPHILLIPS COMPANY'S
RESPONSE TO COURT'S NOTICE TO
DEFENDANTS RE MARCH 21, 2018
TUTORIAL**

Case No. 3:17-cv-06011-WHA

1 THE PEOPLE OF THE STATE OF
CALIFORNIA, acting by and through the San
Francisco City Attorney DENNIS J. HERRERA,

Case No. 3:17-cv-06012-WHA

2 Plaintiff and Real Party in Interest,

3 v.

4 BP P.L.C., *et al.*,

5 Defendants.
6

7
8 ConocoPhillips Company submits this statement in response to the Court’s March 21,
9 2018 order directing it to “submit a statement explaining any disagreements with the statements
10 made by counsel for defendant Chevron Corporation during the March 21 tutorial.” Notice to
11 Defendants re Tutorial, No. 3:17-cv-06011 (N.D. Cal. Mar. 21, 2018), ECF No. 178. The
12 tutorial Chevron Corporation presented was in response to the Court’s invitation to the parties to
13 “conduct a two-part tutorial on the subject of global warming and climate change.” Notice Re
14 Tutorial, No. 3:17-cv-06011 (N.D. Cal. Feb. 27, 2018), ECF No. 135.¹

15 In response to the Court’s March 21, 2018 order, ConocoPhillips Company states that it
16 does not conduct research on global warming and climate change science but defers to the
17 scientific community’s consensus views on the science as reflected in, *inter alia*, the
18 Intergovernmental Panel on Climate Change (IPCC) science assessments. ConocoPhillips
19 Company understands that Chevron Corporation based its March 21 global warming and climate
20 change science tutorial presentation on the IPCC science assessments, and in particular the 2013
21 Fifth Assessment Report (AR5). ConocoPhillips Company does not disagree with the points
22 made in the Chevron Corporation tutorial presentation on March 21, 2018.

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24 ///

25 _____
26 ¹ By responding to the Court’s order, ConocoPhillips Company does not waive and specifically preserves its
27 personal jurisdiction objections, including in reliance on the Court’s order in open court. (“So just to be fair, all of
28 you who have objected to jurisdiction and/or service of process, this will be deemed to be a special appearance. But
I don’t want you to hold back on the theory that if you say something you’ll have waived your procedural argument.”
Tutorial Tr. 6:9-13 (Mar. 21, 2018).)

1 Dated: April 4, 2018

Respectfully submitted,

2 By: /s/ Carol M. Wood

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