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14 *Attorneys for Defendant Chevron Corporation*
15 *and Chevron U.S.A., Inc.*

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

19 The COUNTY OF SAN MATEO, individually
and on behalf of THE PEOPLE OF THE
20 STATE OF CALIFORNIA,

21 Plaintiff,

22 v.

23 CHEVRON CORP., et al.,
24 Defendants.

First Filed Case: No. 3:17-cv-4929-VC
Related Case: No. 3:17-cv-4934-VC
Related Case: No. 3:17-cv-4935-VC
Related Case: No. 3:18-cv-450-VC
Related Case: No. 3:18-cv-458-VC
Related Case: No. 3:18-cv-732-VC

**CHEVRON CORPORATION'S NOTICE OF
PENDENCY OF OTHER ACTION OR
PROCEEDING**

Case No. 3:17-cv-4929-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-4934-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-4935-VC

THE COUNTY OF SANTA CRUZ,
individually and on behalf of THE PEOPLE
OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

CHEVRON CORP., et al.,

Defendants.

Case No. 3:18-cv-450-VC

THE CITY OF SANTA CRUZ, a municipal
corporation, individually and on behalf of THE
PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

CHEVRON CORP., et al.,

Defendants.

Case No. 3:18-cv-458-VC

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THE CITY OF RICHMOND, a municipal
corporation, individually and on behalf of THE
PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

CHEVRON CORP., et al.,

Defendants.

Case No. 3:18-cv-732-VC

1 **TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that, pursuant to Civil Local Rule 3-13, Defendant Chevron
3 Corporation gives notice that a materially similar action has been filed against it and four other
4 defendants in the above-captioned actions, BP p.l.c., ConocoPhillips, Exxon Mobil Corporation, and
5 Royal Dutch Shell plc (collectively, “Defendants”), by King County, Washington, in the Superior
6 Court of the State of Washington in and for King County, captioned as *King County v. BP P.L.C., et*
7 *al.* (Case No. 18-2-11859-0). As here, the County purports to bring state common law claims for
8 public nuisance and trespass based on alleged injuries arising from the phenomena of global warming
9 and climate change. The County’s alleged injuries, like Plaintiffs’ here, include sea level rise and
10 flood damage. The County claims that the Defendants can be held liable for these and other alleged
11 injuries based on their production, marketing, and sale of fossil fuels, although it does not allege that
12 the Defendants’ conduct violated any federal or state statute or regulation. The County demands an
13 abatement fund to finance “the use of coastal armament to protect against sea level rise, and other
14 resiliency measures to protect against global warming-induced injuries.”

15 A copy of the complaint in *King County* is attached hereto as Exhibit A. Chevron
16 Corporation has not yet been served. Chevron Corporation anticipates removing this action to federal
17 district court, and therefore has not yet determined whether any coordination between the King
18 County proceeding and these proceedings is necessary at this time.

1 May 25, 2018

Respectfully submitted,

2 By: /s/ Theodore J. Boutrous

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