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**Exempt from Filing Fees,  
Gov. Code § 6103**

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13 [Additional Counsel Listed on Next Page]

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  
21 SOUTHERN CALIFORNIA GAS  
COMPANY, and DOES 1-50, inclusive,  
22  
23 Defendants.

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**

24  
25 **AND RELATED CONSOLIDATED  
CASES.**  
26  
27

1 MARY C. WICKHAM, County Counsel  
LAWRENCE L. HAFETZ, Assistant County Counsel  
SHARON REICHMANN, Assistant County Counsel  
2 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           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.

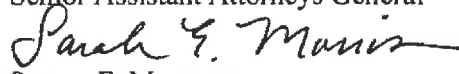
6           IT IS THEREFORE HEREBY DECLARED, STIPULATED, AND AGREED BY THE  
7 PARTIES TO THIS ACTION, AS FOLLOWS:

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.

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Dated: February 1, 2016

Respectfully Submitted,

KAMALA D. HARRIS  
Attorney General of California  
SALLY MAGNANI  
ROBERT W. BYRNE  
Senior Assistant Attorneys General  
  
SARAH E. MORRISON  
Supervising Deputy Attorney General

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

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Dated: February 1, 2016

MICHAEL N. FEUER, City Attorney  
THOMAS H. PETERS, Chief Assistant City Attorney  
TINA L. HESS, Assistant City Attorney  
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CRIMINAL BRANCH  
COMPLEX & SPECIAL LITIGATION SECTION



JESSICA B. BROWN  
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*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  
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*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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Deputy City Attorney

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

Dated: February \_\_, 2016

MARY C. WICKHAM  
County Counsel  
COUNTY OF LOS ANGELES

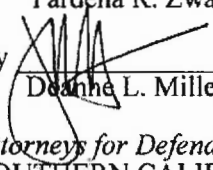
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Senior Deputy County Counsel

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

Dated: February \_\_, 2016

MORGAN, LEWIS & BOCKIUS LLP  
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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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**[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