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

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

20 Plaintiff and Real Party in Interest,

21 v.

22 BP P.L.C., a public limited company of  
England and Wales, CHEVRON  
23 CORPORATION, a Delaware corporation,  
CONOCOPHILLIPS COMPANY, a Delaware  
24 corporation, EXXON MOBIL  
CORPORATION, a New Jersey corporation,  
25 ROYAL DUTCH SHELL PLC, a public  
limited company of England and Wales, and  
26 DOES 1 through 10,

27 Defendants.  
28

First Filed Case: No. 3:17-cv-06011-WHA  
Related Case: No. 3:17-cv-06012-WHA

**BP P.L.C.’S RESPONSE TO THE  
COURT’S MARCH 21, 2018 NOTICE TO  
DEFENDANTS RE TUTORIAL**

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

Judge: Hon. William H. Alsup

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

5 Plaintiff and Real Party in Interest,

6 v.

7 BP P.L.C., a public limited company of  
8 England and Wales, CHEVRON  
9 CORPORATION, a Delaware corporation,  
10 CONOCOPHILLIPS COMPANY, a Delaware  
11 corporation, EXXON MOBIL  
12 CORPORATION, a New Jersey corporation,  
13 ROYAL DUTCH SHELL PLC, a public  
14 limited company of England and Wales, and  
15 DOES 1 through 10,

16 Defendants.

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

1 In its February 27, 2018 Order, the Court “invite[d] counsel to conduct a two-part tutorial on  
2 the subject of global warming and climate change.” No. 17-cv-06011, ECF No. 135. On March 21,  
3 2018, counsel for Plaintiffs and Chevron conducted the tutorial, and the Court recognized that some  
4 defendants had filed personal jurisdiction motions and would not risk waiving those defenses by  
5 participating.<sup>1</sup> Later that day, the Court filed a Notice to Defendants Re Tutorial, ordering BP p.l.c.  
6 (“BP”), and other defendants, to “submit a statement explaining any disagreements with the  
7 statements made by counsel for defendant Chevron Corporation during the March 21 tutorial.” No.  
8 17-cv-06011, ECF No. 178.

9 BP does not disagree with the tutorial presentation made by Chevron on March 21, 2018, and  
10 believes that it fairly responded to the Court’s tutorial request and questions. BP reserves the right  
11 to advance on motions and at trial such positions as are supported by fact and scientific/expert  
12 evidence in support of its defense.

13  
14 Dated: April 4, 2018

ARNOLD & PORTER KAYE SCHOLER LLP

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16  
17 By: /s/ Jonathan W. Hughes

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28 <sup>1</sup> For the avoidance of doubt, BP p.l.c. reiterates that it reserves and does not intend to waive its  
personal jurisdiction defense.