KAMALA D. HARRIS **Exempt from Filing Fees,** Attorney General of California Gov. Code § 6103 SALLY MAGNANI ROBERT W. BYRNE Senior Assistant Attorneys General SARAH E. MORRISON, SBN 143459 Supervising Deputy Attorney General CATHERINE M. WIEMAN, SBN 222384 ELIZABETH B. RUMSEY, SBN 257908 Deputy Attorneys General 300 South Spring Street, Suite 1702 Los Angeles, California 90013 Telephone (213) 897-2640/Facsimile (213) 897-2802 MICHAEL N. FEUER, City Attorney, SBN 111529 THOMAS H. PETERS, Chief Assistant City Attorney, SBN 163388 TINA L. HESS, Assistant City Attorney, SBN 143900 JESSICA B. BROWN, Deputy City Attorney, SBN 211642 NICK KARNO, Deputy City Attorney, SBN 210805 OFFICE OF THE LOS ANGELES CITY ATTORNEY 200 North Main Street, 500 City Hall East Los Angeles, California 90012-4131 Telephone (213) 473-6922/Facsimile (213) 978-8112 12 [Additional Counsel Listed on Next Page] 13 Attorneys for Plaintiff, the People of the State of California SUPERIOR COURT OF THE STATE OF CALIFORNIA 15 COUNTY OF LOS ANGELES 16 THE PEOPLE OF THE STATE OF 17 CALIFORNIA, Case No. BC602973 (Consolidated with Lead Case No. BC601844 and Case Nos. 18 Plaintiff. BC603602, BC604099, BC604353, BC604414, BC604592, BC605084, 19 BC605085, BC605173, BC605406, vs. BC605407, BC605892, 606427, BC606555, 20 606844, 606941, 607057, 607347, 607540, 607541, 607841, 607542, 607697, 607839, 21 SOUTHERN CALIFORNIA GAS and 607840) COMPANY, and DOES 1-50, inclusive, 22 STIPULATION AND [PROPOSED] ORDER FOR LEAVE TO AMEND 23 THE PEOPLE'S COMPLAINT Defendants. 24 AND RELATED CONSOLIDATED 25 CASES. 26 27 28

STIPULATION AND [PROPOSED] ORDER FOR LEAVE TO AMEND THE PEOPLE'S COMPLAINT

MARY C. WICKHAM, County Counsel 1 LAWRENCE L. HAFETZ, Assistant County Counsel SHARON REICHMANN, Assistant County Counsel GRACE Chang, Principal Deputy County Counsel DUSAN PAVLOVIC, Senior Deputy County Counsel, SBN 228509 NORAYR ZURABYAN, Senior Associate County Counsel OFFICE OF THE COUNTY COUNSEL 648 Hall of Administration 500 West Temple Street, 6th Floor Los Angeles, CA 90012 Attorneys for Plaintiff, the People of the State of California

STIPULATION

Plaintiff, the People of the State of California ("the People"), represented by Kamala D. Harris, Attorney General, in her independent capacity and on behalf of the California Air Resources Board, the City of Los Angeles City Attorney's Office, and County Counsel for the County of Los Angeles; and Defendant, the Southern California Gas Company ("Defendant"), by and through their undersigned counsel of record, hereby stipulate and agree, subject to Court approval, as follows.

WHEREAS, on December 7, 2015, the Los Angeles City Attorney, Michael N. Feuer ("City Attorney"), filed a Complaint on behalf of the People in the above entitled action (Case No. BC602973) against Defendant.

WHEREAS, on January 8, 2016, the People filed a First Amended Complaint joining the County of Los Angeles, by and through Mary C. Wickham, County Counsel, as a plaintiff to the public nuisance claim.

WHEREAS, on December 30, 2015, the Court ordered the People's case consolidated with Case No. BC601844, *Gandsey v. Southern California Gas Company*, subject to bifurcation at trial. Case No. BC601844 was designated as the lead case.

WHEREAS, Attorney General Kamala D. Harris, ("Attorney General") is authorized by Government Code section 12606 to intervene in this matter on behalf the People and file independent causes of action against Defendant.

WHEREAS, the California Air Resources Board ("ARB"), acting by and through its counsel the Attorney General, is authorized to bring an action against Defendant on behalf of the People for enforcement of air pollution control laws.

WHEREAS, the People wish to have one combined complaint in lieu of multiple complaints pending on behalf of the People to promote efficiency and economy of the Court and the parties. Therefore, the People seek leave to file a Second Amended Complaint, which adds claims brought by the Attorney General, in her independent capacity and on behalf of ARB, against Defendant. The Second Amended Complaint was lodged concurrently with this Stipulation. A true and correct copy of the Second Amended Complaint is attached as Exhibit 1.

1 2	Dated: February <u>1</u> , 2016	MICHAEL N. FEUER, City Attorney THOMAS H. PETERS, Chief Assistant City Attorney TINA L. HESS, Assistant City Attorney	
3		JESSICA B. BROWN, Deputy City Attorney NICK KARNO, Deputy City Attorney	
4		OFFICE OF THE LOS ANGELES CITY ATTORNEY CRIMINAL BRANCH COMPLEX & SPECIAL LITIGATION SECTION	
5		COMPLEX & SPECIAL EITIGATION SECTION	
6			
7		JESSICA B. BROWN Deputy City Attorney	
8	0	Attorneys for Plaintiff the People of the State of California	
10	Dated: February 1,2016	MARY C. WICKHAM	
11	_	County Counsel COUNTY OF LOS ANGELES	
		May 18	
12		Dosan Pavlovie Senior Deputy County Counsel	
13	¥ 2		
14		Attorneys for Plaintiff the People of the State of California	
15			
16	Dated: February, 2016	MORGAN, LEWIS & BOCKIUS LLP James J. Dragna	
17		David L. Schrader Deanne L. Miller	
18		Yardena R. Zwang-Weissman	
19		By	
20		_ 	
21		Attorneys for Defendant SOUTHERN CALIFORNIA GAS COMPANY	
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	OTHER LANGE LANGE CO.	3	
-	STIPULATION AND [PROPOSED] ORDER FOR LEAVE TO AMEND THE PEOPLE'S COMPLAINT		

1 2 3	Dated: February, 2016	MICHAEL N. FEUER, City Attorney THOMAS H. PETERS, Chief Assistant City Attorney TINA L. HESS, Assistant City Attorney JESSICA B. BROWN, Deputy City Attorney NICK KARNO, Deputy City Attorney OFFICE OF THE LOS ANGELES CITY ATTORNEY
4		CRIMINAL BRANCH COMPLEX & SPECIAL LITIGATION SECTION
5		
6 7		JESSICA B. BROWN
·		Deputy City Attorney
8		Attorneys for Plaintiff the People of the State of California
10	Dated: February, 2016	MARY C. WICKHAM
11	, i	County Counsel COUNTY OF LOS ANGELES
12		Dušan Pavlović
13		Senior Deputy County Counsel
14		Attorneys for Plaintiff the People of the State of California
15	5	
16	Dated: February, 2016	MORGAN, LEWIS & BOCKIUS LLP James J. Dragna
17		David L. Schrader Deanne L. Miller Vardene B. Zwang Weissman
18		Yardena R. Zwang-Weissman
19		By Deanha L. Miller
20		Attorneys for Defendant SOUTHERN CALIFORNIA GAS COMPANY
21		SOUTHERN CALIFORNIA GAS COMPANY
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1	[PROPOSED] ORDER		
2	Having reviewed the foregoing Stipulation by and among the People and Defendants, IT		
3	IS HEREBY ORDERED AS FOLLOWS:		
4	1. The People's request for leave to file a Second Amended Complaint is hereby		
5	GRANTED.		
6	2. The Second Amended Complaint is deemed filed as of the date of entry of this Orde		
7	3. The People shall serve the Second Amended Complaint within fifteen days of the		
8	date of notice of entry of this Order.		
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10	IT IS SO ORDERED.		
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12	Dated:		
13	JUDGE OF THE SUPERIOR COURT		
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