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FILED
Superior Court of California
County of Los Angeles

DEC 02 2025

David W. Slayton, Executive Officer/Clerk of Court
By: A. Morales, Deputy

16 *Liaison Counsel for Individual Plaintiffs*

17 (Additional counsel listed on the following
page)

18
19 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
20 **COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE**

21 **PALISADES FIRE LITIGATION**

Lead Case No. 25STCV00832

22 DAN GRIGSBY, et al.,

**~~PROPOSED~~ CASE MANAGEMENT
ORDER NO. 2**

23 Plaintiff,

24 vs.

Assigned for All Purposes to:
Hon. Samantha Jessner, Dept 7

25 CITY OF LOS ANGELES ACTING BY AND
THROUGH THE LOS ANGELES
DEPARTMENT OF WATER AND POWER,
26 et al.,

Action Filed: January 13, 2025
Trial Date: Not set

27 Defendants.

28 **AND ALL RELATED CASES**

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12 *Acting By and Through the Los Angeles*

13 *Department of Water and Power*

STATE OF CALIFORNIA

DEPARTMENT OF JUSTICE

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300 S. Spring Street

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Tel.: (213) 269-6525

*Attorneys for Defendant State of California
acting by and through the State of California
Department of Parks and Recreation (also
erroneously sued herein as California
Department of Parks and Recreation)*

1 **I. MASTER COMPLAINT AND NOTICES OF ADOPTION**

2 Pursuant to the Court’s Order, dated September 8, 2025, Liaison Counsel for the Individual
3 Plaintiffs lodged a Master Complaint on October 8, 2025. On November 17, 2025, the Court
4 deemed the Master Complaint filed in the Lead Case (Grigsby) as of October 8, 2025. On
5 December 1, 2025, Liaison Counsel for the Individual Plaintiffs lodged a Master Complaint –
6 Revised. Pursuant to the parties’ agreement, the Court deems the Revised Master Complaint filed
7 as of December 1, 2025. The Parties must separately file the Revised Master Complaint no later
8 than December 5, 2025 (so that it is not only attached as an exhibit to a Notice of Lodging) **in the**
9 **courtroom/Dept. 7 directly. This document must be titled, “Revised Master Complaint.”**

10 That December 1, 2025 Revised Master Complaint is hereby ordered to be the Master
11 Complaint for the Individual Plaintiffs. This Case Management Order No. 2 (“CMO 2”) governs
12 procedures for adopting the Master Complaint and related pleading-stage issues.

13
14 **A. Consolidation**

15 Each case filed in Los Angeles Superior Court that brings tort or inverse condemnation
16 claims relating to the Palisades Fire is consolidated under this action for pretrial purposes only.
17 This CMO 2 applies to all such cases (each a “Palisades Fire Case”). All Plaintiffs initiating new
18 Palisades Fire Cases after the entry of this CMO 2 must file a notice of related case relating their
19 case to this Lead Case within 30 days of initiating their case.

20
21 **B. Initiating a Palisades Fire Case / Filing a Notice of Adoption**

22 **Short Form Complaint:** The “Short Form Complaint” (Exhibit A) is for **cases that have**
23 **not yet been filed.** To initiate a suit that will immediately adopt Master Complaint, a plaintiff
24 may complete and file a Short Form Complaint (Exhibit A). A Short Form Complaint can contain
25 up to a maximum of 45 plaintiffs. Plaintiffs that file a Short Form Complaint do not need to file a
26 Notice of Adoption (Exhibit B). Plaintiffs filing a Short Form Complaint must also timely file a
27 Notice of Related Case to the Lead Case. (See Exhibit C for a sample).

1 **Notice of Adoption:** The Notice of Adoption (**Exhibit B**) is for Palisades Fire plaintiffs
2 who wish to adopt the Master Complaint in a case that is **already on file** in the Los Angeles
3 Superior Court. Plaintiffs in any Palisades Fire Case who filed a complaint that was not the Short
4 Form Complaint who want to adopt the Master Complaint must complete and file a Notice of
5 Adoption in the form set out in Exhibit B. Notices of Adoption shall be filed in each Plaintiffs'
6 respective cases, not in this Lead Case. Each Notice of Adoption shall constitute an amended
7 complaint for all purposes. Again, Plaintiffs that file a Short Form Complaint do not need to also
8 file a Notice of Adoption (Exhibit B).

9 In order to ensure that all parties are registered/entered in the Court's Case Management
10 System, if there are any additional parties that have been added since the filing of the original
11 underlying Complaint by way of the Revised Master Complaint, any plaintiff filing a NOA who
12 seeks to recover from a newly-added defendant, must file an Amendment to Complaint (LASC
13 CIV-105) in the underlying case.

14
15 **Household Grouping:** Plaintiffs must be grouped by household within their Short Form
16 Complaint or Notice of Adoption. The parties agree that the grouping of particular Plaintiffs
17 together in a complaint or Notice of Adoption shall have no bearing on whether such Plaintiffs'
18 claims shall be tried together.

19
20 **Notice of Related Case:** All Palisades Fire plaintiffs must file a Notice of Related Case to
21 the Lead case both in the Lead Case and in the case in which they filed their complaint. **Exhibit C**
22 has a sample Notice of Related Case.

23
24 **WARNING: Statute of Limitations Not Satisfied by the filing of the Master**
25 **Complaint by Liaison Counsel:** The date on which the Master Complaint was lodged or filed by
26 Liaison Counsel has no bearing on whether any Plaintiff has satisfied any applicable statute of
27 limitations. The operative date for statute of limitations purposes remains the date on which a
28 Plaintiff files a complaint or Short Form Complaint per the Code of Civil Procedure. Nothing in

1 this CMO 2 has any impact on any deadlines to file administrative claims under the Government
2 Code.

3

4 **C. Electronic Submission of Notice of Adoption Information**

5 Subject to receiving a suitable bid and agreement on cost allocation, the parties will meet
6 and confer and agree on a vendor to create a portal for Plaintiffs to enter the information required
7 by the Notice of Adoption in the form set out in Exhibit B. Plaintiffs in all Palisades Fire Cases
8 must submit the information required by the Notice of Adoption in the form set out in Exhibit B to
9 the vendor within 90 days of filing a complaint or 90 days of the vendor opening the portal,
10 whichever is later.

11 Counsel for Individual Plaintiffs or Individual Plaintiffs acting pro se should contact
12 Liaison Counsel for Individual Plaintiffs for information on how to access and register their clients
13 on the portal.

14 Certain data entered into the portal shall be reported to the Court and counsel for
15 Defendants on the last business day of each month. In the future, the parties will agree on a report
16 format that details data that will be housed in the portal. The report shall include the following
17 categories for each Individual Plaintiff registered in the portal:

- 18 • Plaintiff Name (Individual/Business/Entity)
- 19 • Adult/Minor (if individual)
- 20 • Counsel
- 21 • Household ID
- 22 • Original Case Name and Number (if relevant)
- 23 • For each real property loss alleged:
 - 24 • Address
 - 25 • Parcel Number
 - 26 • Relationship to Loss Location (Owner/Renter/Other)
 - 27 • Structural Damage Sustained (Total Burn Down/Flame Damage, Not
28 Total Burn Down/Soot or Ash Only/Other)

- 1 • Insurance (Y/N)
- 2 • If yes, insurance type (homeowners/renters/other)
- 3 • If yes, name of insurance company
- 4 • Wrongful Death (Y/N)
- 5 • Master Complaint Causes of Action Adopted
- 6 • Master Complaint Damages Adopted

7 **D. Failure to Comply with Notice of Adoption Requirements**

8 If Defendant considers a Notice of Adoption or Short Form Complaint to be materially
 9 deficient, a deficiency notice outlining the purported deficiency(ies) shall be served on the
 10 deficient individual(s) or their attorney of record via Case Anywhere. The deficient individual(s)
 11 will have 30 days to correct the alleged deficiency(ies).

12 If, after service of a deficiency letter, the individual(s) fail(s) to cure the alleged deficiency
 13 within 30 days, Defendant may move the Court for an order to show cause regarding dismissal of
 14 the Notice of Adoption or Short Form Complaint, and thus, the claims therein.

15 If a Plaintiff who has already filed a complaint as of the date of entry of CMO 2 fails to
 16 submit a Notice of Adoption within 90 days of the entry of this CMO 2 or within 90 days of
 17 Plaintiff’s filing of a complaint for people who have not yet filed a complaint, whichever is later,
 18 Defendant may move the Court for an order to show cause regarding dismissal of the Plaintiffs’
 19 claims. The deadline to file a Notice of Adoption may be extended by written stipulation between
 20 Plaintiff and all relevant Defendants. To be effective, any extension of the Plaintiff’s deadline to
 21 submit a Notice of Adoption under CMO 2 must be in writing and state a new date certain by
 22 which the Notice of Adoption is to be filed.

24 **II. DEFENDANTS’ RESPONSIVE PLEADINGS**

25 Any Defendant required to file an answer shall file a single Master Answer consistent with
 26 the California Code of Civil Procedure. Defendants are not required to answer any other
 27 complaint in any Palisades Fire Case, including any Short Form Complaint. Defendants will not
 28 be deemed to have waived any rights nor admitted to any allegations against them by relying on

1 the Master Answer to respond to any complaint or Notice of Adoption. Defendants may file other
2 motions as to any complaint, Short Form Complaint, or Notice of Adoption consistent with the
3 procedures of the California Code of Civil Procedure.

4 **III. CROSS-COMPLAINTS**

5 The procedure for and timing of cross-complaints and third-party complaints will be
6 addressed in a future case management order.

7
8 **IV. PAYMENT OF JURY FEES**

9 No jury fees shall be due until a case is set for trial. Once a case is set for trial, each
10 Plaintiff group within that case shall pay jury fees within 30 days of the date that the case is set for
11 trial.

12
13 **V. RECUSALS**

14 Previously, the Court recused itself from the cases in which the following are plaintiffs:
15 Darren and Elaine Seidel, Doug and Caroline Fuchs, the Honorable Elaine Mandel, and Edith
16 Matthai. These plaintiffs (including anyone else in their respective household) must be grouped in
17 one NOA so that their cases may be easily assigned to another judge assigned to a Complex Civil
18 department.

19
20 **IT IS SO ORDERED.**

21 Dated: DECEMBER 2, 2025

22 

23 Hon. Samantha R. Jessner
24 Judge of the Superior Court

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Exhibit A

1 **[Law Firm]**
[Lawyer Name] (State Bar No. _____)
2 [Lawyer Email]
[Lawyer Address]
3 [Lawyer Telephone]

4 ***Counsel for Individual Plaintiffs***

5
6
7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE
10

11 **PALISADES FIRE LITIGATION**

12 *[Plaintiffs covered by SFC/NOA],*

13 Plaintiffs,

14 vs.

15 DEFENDANTS NAMED HEREIN,

16 Defendants.

Lead Case No. 25STCV00832
Case No: [insert]

SHORT FORM COMPLAINT

Assigned for All Purposes to:
Hon. Samantha Jessner, Department 7

Master Complaint Filed: October 8, 2025
Trial Date: Not set

17
18 Pursuant to the Court's Case Management Order No. 2, Plaintiff(s) hereby submit(s) this
19 [Short Form Complaint and] Notice of Adoption of the Master Complaint against Defendants
20 identified herein and hereby adopt(s) and incorporate(s) by reference the Master Complaint filed
21 on October 8, 2025, and any and all amendments thereto.

22 **A. Identity of Plaintiff(s)**

23 Individual Plaintiff Name: _____

24 Business Plaintiff name: _____

25 Non-Business Plaintiff (i.e., trust owning property): _____

26 Individual Plaintiff is: An Adult A minor [If minor, Guardian ad Litem is:

27 _____]

28 *[Repeat for each plaintiff covered by this NOA]*
55727338.1

2

1 List names of all members of the same household who have filed suit, specifying the
2 household by name for each plaintiff:

3

4

5 **B. Factual Allegations**

6 **1. General Allegations**

7 Plaintiff(s) adopt each of the factual allegations set forth in the Master Complaint, and
8 agree to be bound by any rulings with respect to those paragraphs, except for the paragraph
9 numbers set forth below. *[If the box below is empty, then Plaintiffs will have been deemed to adopt*
10 *all factual allegations in the Master Complaint.]*

11

12

13

14 **2. Causation Allegations**

15 Plaintiffs acknowledge that causation is an element of their causes of action. Plaintiffs
16 plead that the Defendants against whom they are proceeding caused their damages as follows.
17 *[If this box is left blank, Plaintiff(s) will be deemed to have adopted only those causation*
18 *allegations that appear in the Master Complaint]*

19

20

21

22

23 **3. Additional Factual Allegations**

24 Plaintiffs make the following additional factual allegations not included in the Master Complaint.
25 *[If the box below is empty, then Plaintiffs will have been deemed to not make any additional*
26 *factual allegations.]*

27

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5 **C. Causes of Action**

6 **1. Master Complaint Causes of Action and Defendants**

7 Plaintiff(s) incorporate(s) the causes of action from the Master Complaint, and the Defendants as
8 to each, as follows. [Complete this table for each cause of action in the Master Complaint. Check
9 each cause of action you are adopting and the Defendants against whom you are adopting each
10 cause of action.]

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
One. Dangerous Condition of Public Property (Topanga State Park) against Defendants State of California and CA State Parks and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> CA State Parks <input type="checkbox"/> Does 1-50
Two. Public Nuisance against Defendant CA State Parks and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> CA State Parks <input type="checkbox"/> Does 1-50
Three. Dangerous Condition of Public Property (Vacant Lots) against Defendant State of California and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> Does 1-50
Four. Nuisance against Defendant State of California and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> Does 1-50
Five. Inverse Condemnation (Power Lines) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Six. Inverse Condemnation (Water Supply System) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Seven. Dangerous Condition of Public Property (Powerlines) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Eight. Public Nuisance (Powerlines) against Defendant LAWDP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Nine. Dangerous Condition of Public Property (Vacant Lots) Against Defendant City of Los Angeles and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> City of Los Angeles <input type="checkbox"/> Does 1-50

	Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
1			
2			
3	Ten. Public Nuisance (Vacant Lots) against Defendant City of Los Angeles and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> City of Los Angeles <input type="checkbox"/> Does 1-50
4			
5	Eleven. Inverse Condemnation (Power Poles) Against Defendant SCE and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-50
6			
7	Twelve. Negligence (Overloaded Poles) Against Defendant SCE and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-50
8	Thirteen. Trespass against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
9			
10	Fourteen. Private Nuisance against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
11	Fifteen. Public Nuisance against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
12	Sixteen. Premises Liability against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
13	Seventeen. Violation of Public Utilities Code § 2106 against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
14			
15	Eighteen. Violation of Health and Safety Code § 13007 against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
16			
17			
18	Nineteen. Inverse Condemnation (Overloaded Poles) against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
19			
20	Twenty. Negligence (Overloaded Poles) against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
21			
22	Twenty-One. Trespass against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
23			
24	Twenty-Two. Private Nuisance against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
25			
26	Twenty-Three. Public Nuisance against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
27			
28			

	Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
1			
2			
3	Twenty-Four. Premises Liability against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
4			
5	Twenty-Five. Violation of Health and Safety Code § 13007 against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
6			
7			
8	Twenty-Six. Inverse Condemnation against Defendants Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
9			
10	Twenty-Seven. Dangerous Condition of Public Property against Defendants Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
11			
12	Twenty-Eight. Public Nuisance against Defendant Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
13			
14	Twenty-Nine. Inverse Condemnation against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
15			
16	Thirty. Dangerous Condition against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
17			
18	Thirty-One. Public Nuisance against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
19			
20	Thirty-Two. Negligence against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
21			
22	Thirty-Three. Trespass against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
23			
24	Thirty-Four. Private Nuisance against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
25			
26	Thirty-Five. Public Nuisance against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
27			
28	Thirty-Six. Premises Liability against Defendant Mountain Recreation and	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Conservation Authority and Does 1-20.		<input type="checkbox"/> Does 1-20
Thirty-Seven. Violation of Health & Safety Code § 13007 against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Eight. Dangerous Condition of Public Property against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Nine. Inverse Condemnation (Natural Gas) against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty. Negligence against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-One. Trespass against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Two. Private Nuisance against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Three. Public Nuisance against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Four. Premises Liability against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Five. Violation of Health and Safety Code § 13007 against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Six. Negligence against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Forty-Seven. Public Nuisance against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Forty-Eight. Private Nuisance against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Forty-Nine. Trespass against Defendant J. Paul Getty Trust and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Fifty. Violation of Health and Safety Code §§ 13007, 13008 against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Fifty-One. Negligence against Defendants	<input type="checkbox"/> Yes	<input type="checkbox"/> Biggs Realtv

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Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> No	<input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Two. Public Nuisance against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Three. Private Nuisance against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Four. Breach of Contract against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile States Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20

2. Additional Causes of Action

Plaintiff(s) assert the following additional causes of action against the additional defendants listed below. [If this table is blank, than Plaintiffs will be deemed to have not asserted any additional causes of action against any additional defendants who are not named in the Master Complaint.]

Cause of Action	Against Which Defendants

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D. Damages

Plaintiffs allege they were damaged in the following ways. [For each type of damage you allege, provide the following information. If you need additional space to list all damages, attach an appendix. Use the blank rows at the end of the table to add any additional type of damage you allege.]

Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
Real Property	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each affected property, provide the following information:</p> <p>Physical Address: Assessor's Parcel Number (APN) (if known): Connection: <input type="checkbox"/> Owner <input type="checkbox"/> Renter <input type="checkbox"/> Other [describe] _____</p> <p>Type of damage: <input type="checkbox"/> Total burn down <input type="checkbox"/> Flame damage, not total burn down <input type="checkbox"/> Soot or ash only <input type="checkbox"/> Landscaping only <input type="checkbox"/> Secondary structure (e.g., detached garage, ADU) only <input type="checkbox"/> Other [describe] _____</p> <p>This property was: <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Other [describe] _____</p> <p>[Repeat for any additional real properties.]</p>
Personal Property	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>General Description (optional):</p>
Business Loss	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each affected business, provide the following information:</p> <p>Business Name: Business Address: Nature of Loss (e.g., inventory, lost profits, etc.): General Description (optional):</p> <p>[Repeat for any additional businesses.]</p>
Personal Injury	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each personal injury, provide the following information:</p> <p>Name of injured person: Nature of injury:</p>

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Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
		Date injury sustained: Location where injury sustained: <i>[Repeat for any additional injury.]</i>
Wrongful Death	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each decedent, provide the following information: Name of Decedent: Date of death: Location of death: Cause of death: Plaintiffs Asserting this Cause of Action: <i>[Repeat for any additional decedents.]</i>
Emotional Distress	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging emotional distress: Name of injured person: Nature of emotional distress (optional): <i>[Repeat for any additional plaintiffs.]</i>
Annoyance / Mental Anguish	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging annoyance or mental anguish: Name of injured person: Nature of anguish or annoyance (optional): <i>[Repeat for any additional plaintiffs.]</i>
Lost Wages	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging lost wages: Name of injured person: Business at which injured person worked: <i>[Repeat for any additional plaintiffs.]</i>
Loss of Use	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description (optional):
Alternate Living Expenses	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description (optional):
Other <i>[Repeat for</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description:

1 2 3 4 5 6 7 8 9	Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
	<i>any additional causes of action]</i>		

10 **E. Public Entity Administrative Tort Claims**

11 [For each public entity defendant against whom you filed administrative tort claims, please
12 provide the following information. If you do not list a particular government entity, you will be
13 deemed to have pled that you did not submit an administrative tort claim to that entity. Any blanks
14 will be interpreted as a "No."]

10 11 12 13 14	Government Entity	Did you submit an administrative claim to this entity within the time period required by law?
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No

15 [For tort claims involving personal injury, death, or damage to personal property, the claim must
16 be presented within six months after the accrual of the cause of action. For other types of claims,
17 the deadline is one year after accrual. Gov. Code § 911.2.]

18 Additional allegations relating to administrative tort claims claim (e.g., late claim
19 application) [If blank, then will be interpreted as "none"]:

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22 **F. Demand for Jury Trial**

23 Plaintiffs do / do not demand a trial by jury as to all claims so triable. [If this section
24 is left blank, that blank will be interpreted as "do not."]

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[Name of Attorney]

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Exhibit B

1 **[Law Firm]**
[Lawyer Name] (State Bar No. _____)
2 [Lawyer Email]
[Lawyer Address]
3 [Lawyer Telephone]

4 ***Counsel for Individual Plaintiffs***

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

PALISADES FIRE LITIGATION

[*Plaintiffs covered by SFC/ NOA*],

Plaintiffs,

vs.

DEFENDANTS NAMED HEREIN,

Defendants.

Lead Case No. 25STCV00832
Case No: [insert]

NOTICE OF ADOPTION OF MASTER COMPLAINT

Assigned for All Purposes to:
Hon. Samantha Jessner, Department 7

Master Complaint Filed: October 8, 2025
Trial Date: Not set

Pursuant to the Court's Case Management Order No. 2, Plaintiff(s) hereby submit(s) this [Short Form Complaint and] Notice of Adoption of the Master Complaint against Defendants identified herein and hereby adopt(s) and incorporate(s) by reference the Master Complaint filed on October 8, 2025, and any and all amendments thereto.

G. Identity of Plaintiff(s)

Individual Plaintiff Name: _____

Business Plaintiff name: _____

Non-Business Plaintiff (i.e., trust owning property): _____

Individual Plaintiff is: An Adult A minor [If minor, Guardian ad Litem is:

_____]

[Repeat for each plaintiff covered by this NOA]
55727338.1

1 List names of all members of the same household who have filed suit, specifying the
2 household by name for each plaintiff:

3

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5 **H. Factual Allegations**

6 **1. General Allegations**

7 Plaintiff(s) adopt each of the factual allegations set forth in the Master Complaint, and
8 agree to be bound by any rulings with respect to those paragraphs, except for the paragraph
9 numbers set forth below. *[If the box below is empty, then Plaintiffs will have been deemed to adopt*
10 *all factual allegations in the Master Complaint.]*

11

12

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14 **2. Causation Allegations**

15 Plaintiffs acknowledge that causation is an element of their causes of action. Plaintiffs
16 plead that the Defendants against whom they are proceeding caused their damages as follows.
17 *[If this box is left blank, Plaintiff(s) will be deemed to have adopted only those causation*
18 *allegations that appear in the Master Complaint]*

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23 **3. Additional Factual Allegations**

24 Plaintiffs make the following additional factual allegations not included in the Master Complaint.
25 *[If the box below is empty, then Plaintiffs will have been deemed to not make any additional*
26 *factual allegations.]*

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5 **I. Causes of Action**

6 **1. Master Complaint Causes of Action and Defendants**

7 Plaintiff(s) incorporate(s) the causes of action from the Master Complaint, and the Defendants as
8 to each, as follows. [Complete this table for each cause of action in the Master Complaint. Check
9 each cause of action you are adopting and the Defendants against whom you are adopting each
10 cause of action.]

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
One. Dangerous Condition of Public Property (Topanga State Park) against Defendants State of California and CA State Parks and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> CA State Parks <input type="checkbox"/> Does 1-50
Two. Public Nuisance against Defendant CA State Parks and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> CA State Parks <input type="checkbox"/> Does 1-50
Three. Dangerous Condition of Public Property (Vacant Lots) against Defendant State of California and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> Does 1-50
Four. Nuisance against Defendant State of California and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> Does 1-50
Five. Inverse Condemnation (Power Lines) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Six. Inverse Condemnation (Water Supply System) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Seven. Dangerous Condition of Public Property (Powerlines) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Eight. Public Nuisance (Powerlines) against Defendant LAWDP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Nine. Dangerous Condition of Public Property (Vacant Lots) Against Defendant City of Los Angeles and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> City of Los Angeles <input type="checkbox"/> Does 1-50

	Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
1			
2			
3	Ten. Public Nuisance (Vacant Lots) against Defendant City of Los Angeles and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> City of Los Angeles <input type="checkbox"/> Does 1-50
4			
5	Eleven. Inverse Condemnation (Power Poles) Against Defendant SCE and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-50
6			
7	Twelve. Negligence (Overloaded Poles) Against Defendant SCE and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-50
8	Thirteen. Trespass against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
9			
10	Fourteen. Private Nuisance against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
11	Fifteen. Public Nuisance against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
12	Sixteen. Premises Liability against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
13	Seventeen. Violation of Public Utilities Code § 2106 against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
14			
15	Eighteen. Violation of Health and Safety Code § 13007 against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
16			
17	Nineteen. Inverse Condemnation (Overloaded Poles) against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
18			
19	Twenty. Negligence (Overloaded Poles) against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
20			
21	Twenty-One. Trespass against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
22			
23	Twenty-Two. Private Nuisance against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
24			
25	Twenty-Three. Public Nuisance against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
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1	Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
2	Twenty-Four. Premises Liability against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
3			
4	Twenty-Five. Violation of Health and Safety Code § 13007 against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
5			
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7			
8	Twenty-Six. Inverse Condemnation against Defendants Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
9			
10	Twenty-Seven. Dangerous Condition of Public Property against Defendants Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
11			
12	Twenty-Eight. Public Nuisance against Defendant Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
13			
14			
15	Twenty-Nine. Inverse Condemnation against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
16			
17	Thirty. Dangerous Condition against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
18			
19	Thirty-One. Public Nuisance against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
20			
21	Thirty-Two. Negligence against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
22			
23	Thirty-Three. Trespass against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
24			
25	Thirty-Four. Private Nuisance against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
26			
27	Thirty-Five. Public Nuisance against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
28			
	Thirty-Six. Premises Liability against Defendant Mountain Recreation and	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority

1	Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
2	Conservation Authority and Does 1-20.		<input type="checkbox"/> Does 1-20
3			
4	Thirty-Seven. Violation of Health & Safety Code § 13007 against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
5			
6	Thirty-Eight. Dangerous Condition of Public Property against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
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9	Thirty-Nine. Inverse Condemnation (Natural Gas) against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
10			
11	Forty. Negligence against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
12			
13	Forty-One. Trespass against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
14			
15	Forty-Two. Private Nuisance against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
16			
17	Forty-Three. Public Nuisance against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
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19			
20	Forty-Four. Premises Liability against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
21			
22	Forty-Five. Violation of Health and Safety Code § 13007 against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
23			
24	Forty-Six. Negligence against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
25			
26	Forty-Seven. Public Nuisance against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
27			
28	Forty-Eight. Private Nuisance against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
	Forty-Nine. Trespass against Defendant J. Paul Getty Trust and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
	Fifty. Violation of Health and Safety Code §§ 13007, 13008 against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
	Fifty-One. Negligence against Defendants	<input type="checkbox"/> Yes	<input type="checkbox"/> Biggs Realtv

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Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> No	<input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Two. Public Nuisance against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Three. Private Nuisance against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Four. Breach of Contract against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile States Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20

2. Additional Causes of Action

Plaintiff(s) assert the following additional causes of action against the additional defendants listed below. [If this table is blank, than Plaintiffs will be deemed to have not asserted any additional causes of action against any additional defendants who are not named in the Master Complaint.]

Cause of Action	Against Which Defendants

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J. Damages

Plaintiffs allege they were damaged in the following ways. [For each type of damage you allege, provide the following information. If you need additional space to list all damages, attach an appendix. Use the blank rows at the end of the table to add any additional type of damage you allege.]

Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
Real Property	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each affected property, provide the following information:</p> <p>Physical Address: Assessor's Parcel Number (APN) (if known): Connection: <input type="checkbox"/> Owner <input type="checkbox"/> Renter <input type="checkbox"/> Other [describe] _____</p> <p>Type of damage: <input type="checkbox"/> Total burn down <input type="checkbox"/> Flame damage, not total burn down <input type="checkbox"/> Soot or ash only <input type="checkbox"/> Landscaping only <input type="checkbox"/> Secondary structure (e.g., detached garage, ADU) only <input type="checkbox"/> Other [describe] _____</p> <p>This property was: <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Other [describe] _____</p> <p>[Repeat for any additional real properties.]</p>
Personal Property	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>General Description (optional):</p>
Business Loss	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each affected business, provide the following information:</p> <p>Business Name: Business Address: Nature of Loss (e.g., inventory, lost profits, etc.): General Description (optional):</p> <p>[Repeat for any additional businesses.]</p>
Personal Injury	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each personal injury, provide the following information:</p> <p>Name of injured person: Nature of injury:</p>

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Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
		Date injury sustained: Location where injury sustained: <i>[Repeat for any additional injury.]</i>
Wrongful Death	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each decedent, provide the following information: Name of Decedent: Date of death: Location of death: Cause of death: Plaintiffs Asserting this Cause of Action: <i>[Repeat for any additional decedents.]</i>
Emotional Distress	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging emotional distress: Name of injured person: Nature of emotional distress (optional): <i>[Repeat for any additional plaintiffs.]</i>
Annoyance / Mental Anguish	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging annoyance or mental anguish: Name of injured person: Nature of anguish or annoyance (optional): <i>[Repeat for any additional plaintiffs.]</i>
Lost Wages	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging lost wages: Name of injured person: Business at which injured person worked: <i>[Repeat for any additional plaintiffs.]</i>
Loss of Use	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description (optional):
Alternate Living Expenses	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description (optional):
Other <i>[Repeat for</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description:

Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
<i>any additional causes of action]</i>		

K. Public Entity Administrative Tort Claims

[For each public entity defendant against whom you filed administrative tort claims, please provide the following information. If you do not list a particular government entity, you will be deemed to have pled that you did not submit an administrative tort claim to that entity. Any blanks will be interpreted as a "No."]

Government Entity	Did you submit an administrative claim to this entity within the time period required by law?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No

[For tort claims involving personal injury, death, or damage to personal property, the claim must be presented within six months after the accrual of the cause of action. For other types of claims, the deadline is one year after accrual. Gov. Code § 911.2.]

Additional allegations relating to administrative tort claims claim (e.g., late claim application) *[If blank, then will be interpreted as "none"]*:

L. Demand for Jury Trial

Plaintiffs do / do not demand a trial by jury as to all claims so triable. *[If this section is left blank, that blank will be interpreted as "do not."]*

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[Name of Attorney]

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Exhibit C

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): SBN		FOR COURT USE ONLY	
TELEPHONE NO. _____ FAX NO. (Optional) _____			
E-MAIL ADDRESS (Optional) _____			
ATTORNEY FOR (Name): Plaintiff's			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS 312 North Spring Street MAILING ADDRESS: 312 North Spring Street CITY AND ZIP CODE Los Angeles, 90012 BRANCH NAME: SPRING STREET COURTHOUSE			
PLAINTIFF/PETITIONER:		CASE NUMBER:	
DEFENDANT/RESPONDENT: City of Los Angeles Acting by and through the Los Angeles Department of Water and Power, et al.		JUDICIAL OFFICER:	
NOTICE OF RELATED CASE		DEPT.:	

Identify, in chronological order according to date of filing, all cases related to the case referenced above.

1. a. Title: Dan Grigsby, et al., v. City of Los Angeles acting by and through the Los Angeles Department of Water and Power, et al.
- b. Case number: 25STCV00832
- c. Court: same as above
 other state or federal court (name and address):
- d. Department: 7
- e. Case type: limited civil unlimited civil probate family law other (specify):
- f. Filing date: 1/13/2025
- g. Has this case been designated or determined as "complex?" Yes No
- h. Relationship of this case to the case referenced above (check all that apply):
 - involves the same parties and is based on the same or similar claims.
 - arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 - involves claims against, title to, possession of, or damages to the same property.
 - is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 - Additional explanation is attached in attachment 1h
- i. Status of case:
 - pending
 - dismissed with without prejudice
 - disposed of by judgment
2. a. Title:
- b. Case number:
- c. Court: same as above
 other state or federal court (name and address):
- d. Department:

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PLAINTIFF/PETITIONER	CASE NUMBER
DEFENDANT/RESPONDENT: City of LA acting by and through the LAWDP	

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF RELATED CASE**

(NOTE: You cannot serve the Notice of Related Case if you are a party in the action. The person who served the notice must complete this proof of service. The notice must be served on all known parties in each related action or proceeding.)

1. I am at least 18 years old and not a party to this action. I am a resident of or employed in the county where the mailing took place, and my residence or business address is *(specify)*:

2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and *(check one)*:
 - a. deposited the sealed envelope with the United States Postal Service.
 - b. placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
3. The *Notice of Related Case* was mailed:
 - a. on *(date)*:
 - b. from *(city and state)*:
4. The envelope was addressed and mailed as follows:

<ol style="list-style-type: none"> a. Name of person served: Street address: City: State and zip code: 	<ol style="list-style-type: none"> c. Name of person served: Street address: City: State and zip code:
<ol style="list-style-type: none"> b. Name of person served: Street address: City: State and zip code: 	<ol style="list-style-type: none"> d. Name of person served: Street address: City: State and zip code:

Names and addresses of additional persons served are attached. *(You may use form POS-030(P).)*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME OF DECLARANT) ▶ (SIGNATURE OF DECLARANT)