

Electronically Received 09/29/2026 05:08 PM

HUESTON HENNIGAN LLP

Douglas J. Dixon, State Bar No. 275389
ddixon@hueston.com
Brittani A. Jackson, State Bar No. 320897
bjackson@hueston.com
620 Newport Center Dr # 1300
Newport Beach, CA 92660
Telephone: (213) 788-4340

**SOUTHERN CALIFORNIA EDISON
COMPANY**

Belynda B. Reck, State Bar No. 163561
belynda.reck@sce.com
Patricia A. Cirucci, State Bar No. 210574
patricia.cirucci@sce.com
Brian Cardoza, State Bar No. 137415
brian.cardoza@sce.com
2244 Walnut Grove Avenue

Rosemead, CA 91770

Telephone: (626) 302-6628

**Attorneys for Defendants Southern
California Edison Company and Edison
International**

FILED
Superior Court of California
County of Los Angeles
10/05/2026

David W. Slayton, Executive Officer / Clerk of Court

By: N. Navarro Deputy

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

JEREMY GURSEY, an individual,

Plaintiffs,

v.

SOUTHERN CALIFORNIA EDISON
COMPANY, a California Corporation;
EDISON INTERNATIONAL, a California
Corporation; and DOES 1-200, inclusive,

Defendants.

Lead Case No.: 25STCV00731
and Related Cases

Assigned for all purposes to:

Judge: Hon. Laura A. Seigle
Dept: 17

**[PROPOSED] CASE MANAGEMENT
ORDER NO. 19**

**DISCOVERY EXPERT
COMMUNICATIONS**

1 Nothing in this order is intended to or does supersede any prior Case Management Order in
2 this matter, unless otherwise noted. See Case Management Order No. 1 dated March 17, 2025 (“CMO
3 1”), Case Management Order dated April 18, 2025 (“CMO 2”), Case Management Orders dated May
4 15, 2025 (“CMO 3” and “CMO 4”), and Case Management Order dated June 2, 2025 (“CMO 5”),
5 Case Management Order dated July 10, 2025 (“CMO 6”), and Case Management Order dated August
6 19, 2025 (“CMO 7”), Case Management Order dated September 19, 2025 (“CMO 8”), Case
7 Management Order dated October 6, 2025 (“CMO 9”), Case Management Order dated December
8 18, 2025 (“CMO 10”), Case Management Order dated February 9, 2026 (“CMO 11”), Case
9 Management Order dated April 7, 2026 (“CMO 12”), Case Management Order dated April 8, 2026
10 (“Amended CMO 8”), and Case Management Order dated May 29, 2026 (“CMO 13”). Nothing in
11 this Order alters any party’s obligations under any applicable Protective Order.

12 This Order governs discovery of information concerning the parties’ expert trial witnesses,
13 including any retained, non-retained, rebuttal, and supplemental expert trial witnesses (“Expert
14 Witnesses”) in this action. It establishes:

15 1. Notwithstanding anything to the contrary in any applicable law, including California
16 Code of Civil Procedure Sections 2034.210(c) and 2034.270 and case law, the following categories
17 of data, information, and documents need not be disclosed by any Party, need not be identified or
18 logged on any privilege log and, pursuant to this Order, are outside the scope of permissible
19 discovery, including through deposition questions:

20 a. Oral or written communications, including any notes thereof, between Expert
21 Witnesses and their assistants and/or support staff, counsel for the Parties
22 (including in-house counsel), and counsel’s non-testifying expert consultants,
23 assistants and support staff; however, the following are within the scope of
24 discovery:

25 i. information pertaining to compensation for the Expert Witness’s study or
26 testimony;

27 ii. facts or data that the party’s attorney provided and that the Expert Witness
28

1 considered in forming the opinions to be expressed; or
2 iii. assumptions that the party's attorney provided and that the Expert Witness
3 relied on in forming the opinions to be expressed;
4 b. Any notes or other writings taken or prepared by or for Expert Witnesses or
5 counsel's non-testifying expert consultants in connection with this matter,
6 including but not limited to documents prepared by or for assistants and/or support
7 staff; and
8 c. Draft reports, studies, affidavits or other work product; preliminary or
9 intermediate calculations, computations or data; or other preliminary,
10 intermediate or draft materials prepared by or at the direction of Expert Witnesses
11 or counsel's non-testifying expert consultants.

12 2. The protections set forth in Paragraph 1 shall not apply to any facts, data, documents,
13 or communications that an Expert Witness relies on as a basis for any opinion the Expert Witness
14 expresses in this action, all of which remain subject to discovery notwithstanding this Order.

15 3. Nothing in this Order shall be construed to prevent or limit questions relating to the
16 substance of the Expert Witness's opinions or the Expert Witness's processes for forming his or her
17 opinions (including alternative theories, methodologies, variables, assumptions, documents, or other
18 materials that Expert Witnesses may or may not have considered in formulating their opinions), or
19 to prevent or limit any Party from challenging an Expert Witness's qualifications or the admissibility
20 of any opinion, report, or testimony. Nothing in this Order shall be construed to expand any Party's
21 discovery obligations beyond those imposed by the Code of Civil Procedure.

22 4. This Order applies to all past and future work performed in this matter by or for any
23 Parties' Expert Witnesses and non-testifying expert consultants.

24 5. The inadvertent production or disclosure of any material protected from discovery
25 under this Order shall not constitute a waiver of, and shall not prejudice, any protection otherwise
26 applicable to that material or its subject matter. Upon a request identifying material inadvertently
27 produced, all receiving Parties shall promptly return or destroy the material and all copies, shall make
28

1 no further use of it, and may not rely on the fact or circumstances of its production in any proceeding.

2 6. This Order shall be deemed adopted and binding on each Party unless that Party serves
3 an objection within 21 days after entry of this Order or after the Party's joinder in this action,
4 whichever is later. As to any Party that timely objects, and as to the categories specified in that
5 Party's objection, discovery concerning that Party's Expert Witnesses shall proceed under California
6 Code of Civil Procedure Sections 2034.210(c) and 2034.270 and applicable case law rather than
7 under this Order, and nothing in this Order limits that Party's right to seek a protective order under
8 California Code of Civil Procedure Section 2034.250 or to move to compel. This Order remains in
9 effect as between all Parties that do not timely object.

10
11 **IT IS SO ORDERED.**

12 Dated: 10/05/2026



13 *Laura Seigle*
14 Hon. Laura A. Seigle
15 Judge of the Superior Court
16 Laura A. Seigle / Judge
17
18
19
20
21
22
23
24
25
26
27
28