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**Liaison Counsel for Individual Plaintiffs**

*(Additional Counsel listed on next page)*

**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

**CASE MANAGEMENT ORDER No. 8**  
**Re: Individual Plaintiffs Common Costs**  
**Reimbursement and Costs Assessment**

**FILED**

Superior Court of California  
County of Los Angeles

**09/18/2025**

David W. Slayton, Executive Officer / Clerk of Court

By: N. Navarro Deputy

1 **I. GENERAL PROVISIONS**

2 In prior Case Management Orders, this Court appointed both Liaison Counsel and a  
3 Steering Committee for Individual Plaintiffs. Individual Plaintiffs established a common cost fund  
4 to finance the joint prosecution of Individual Plaintiffs' claims against Defendants Southern  
5 California Edison and Edison International (collectively "Edison Defendants"). Each Individual  
6 Plaintiff Liaison Counsel and member of the Steering Committee contributed an initial \$50,000.00  
7 to the joint Common Cost Fund (the "Fund"). Individual Plaintiffs' Liaison Counsel and Plaintiffs'  
8 Steering Committee seek to establish a process for reimbursing costs incurred for the common  
9 benefit of the Individual Plaintiffs' group from the Fund (a "Common Cost Assessment"). This  
10 shall apply only to joint costs of the individual plaintiffs and shall not be used to pay any fees to  
11 any attorneys for work done. For the avoidance of doubt, Public Entity Plaintiffs and Subrogation  
12 Plaintiffs are not subject to the provisions of this CMO, including the Common Cost Assessment  
13 described below.

14 Individual Plaintiffs' Liaison Counsel and the Steering Committee have approved and  
15 jointly stipulated to the entry of this Order, the contents of which were presented to all Individual  
16 Plaintiffs counsel. Any firm that wishes to "opt-out" of the joint cost sharing may do so by  
17 notifying Liaison Counsel within thirty (30) days after this CMO is filed. Any firm that exercises  
18 its right to opt-out shall receive a refund of any funds it contributed to the joint cost-sharing  
19 account, shall be removed from the Steering Committee (if applicable), and shall not be subject to  
20 the terms of this CMO. Firms that decide to opt-out shall not be entitled to access any of the  
21 materials that are paid for through the joint cost-sharing agreement.

22 **THE COURT ISSUES THIS ORDER:**

- 23 • Appointing a Special Referee under California Code of Civil Procedure §638(b)  
24 to oversee requests and disputes for reimbursement of costs and expenses from  
25 the Fund;
- 26 • Establishing a process by which Individual Plaintiffs' counsel can seek  
27 reimbursement of common costs related to the liability phase of the case and  
28 incurred for the benefit of all individual plaintiffs, from the Fund;

- Creating a Common Cost Assessment to ensure the Fund is adequately and fairly replenished; and
- Formalizing the record keeping and accounting practices necessary to maintain and administer the Fund.

Nothing in this order abrogates or supersedes any prior Case Management Orders in this matter unless otherwise noted.

## **II. APPOINTMENT OF SPECIAL REFEREE**

The Court appoints the Honorable Gail A. Andler (Retired Judge of the California Superior Court) as Special Referee pursuant to California Code of Civil Procedure §638(b) to oversee requests for reimbursement of costs and expenses in accordance with this Order. The Special Referee may be contacted at [judgeandler@icloud.com](mailto:judgeandler@icloud.com).

Judge Andler is an active member of the California State Bar (No. 106340), has consented to serve as Special Referee and has certified that she is aware of and will comply with the applicable provisions of Canon 6 of the Code of Judicial Ethics and the California Rules of Court.

Judge Andler, with the assistance of any person working under her direct supervision, shall consider and make findings and recommendations for the reimbursement of costs and expenses in accordance with this Order and any guidelines and criteria that may be set by the Court, which shall be advisory under Code of Civil Procedure §644, subdivision (b). Judge Andler shall make findings and recommendations regarding the qualification and timing of reimbursement of shared and held costs and expenses in accordance with this Order.

Additionally, Judge Andler may hold meetings, either telephonically or in person, as necessary, to implement her guidelines and recommendations and supervise and hear matters relating to financial contributions from Individual Plaintiffs' Liaison Counsel, members of the Steering Committee, and other Counsel for Individual Plaintiffs. This includes the ability to audit or review the Fund and/or the IPQSF as the Special Referee deems necessary. Any guidelines, recommendations or Orders issued by Judge Andler relating to the reimbursement of costs and expenses shall not be reviewable or discoverable by Defendants. The Special Referee's charges and costs shall be paid from the Fund.

1 **III. REIMBURSEMENT OF LIABILITY EXPERT COSTS**

2 To ensure that the Fund is used for the benefit of all Individual Plaintiffs, no reimbursement  
3 of expert costs shall be made from the common cost fund until a committee, comprised of attorneys  
4 from law firms on the Steering Committee in this action, reviews and approves the specific  
5 reimbursement request. The following attorneys have been selected to serve on Individual  
6 Plaintiffs' Cost Reimbursement Committee based upon their concurrent membership on the  
7 Plaintiffs' Expert Committee, experience working with the experts, extensive knowledge about the  
8 work each expert is performing, and their experience in litigation: Andrew Britton; Joanna Fox;  
9 Amy Hausmann; Sumble Manzoor; Bill Robins; Max Schuver; Rob Siko; Paul Starita; Brianna  
10 Strange; and Jerry White.

11 To qualify for reimbursement, the expert must have been retained by an attorney  
12 representing individual plaintiffs to provide work product, opinions, and services related to proving  
13 liability against Southern California Edison and Edison International for the Eaton Fire. The  
14 expert's work must benefit the Individual Plaintiffs' group *as a whole*, rather than any one firm and  
15 its clients. Any qualifying expert's work product and/or opinions will be made available to the  
16 Steering Committee, and shall constitute individual plaintiffs' work product and shall not be  
17 discoverable until such time as the Court orders, or pursuant to Code of Civil Procedure § 2034.010  
18 et seq.

19 Upon incurring a qualifying expert cost, the attorney that retained the expert shall submit  
20 the expert's invoice to the Cost Reimbursement Committee by sending an email to the following  
21 address: [eatonexpertfeecommittee@singletonschreiber.com](mailto:eatonexpertfeecommittee@singletonschreiber.com). The Committee shall review the  
22 invoice and, within fourteen days of the invoice's submission, and either 1) return the invoice to the  
23 submitting attorney for clarification, comment, revision, and/or amendment, or 2) make a  
24 recommendation as to whether the cost should be reimbursed from the Fund.

25 The Committee's recommendation shall be determined by simple majority vote of its  
26 members. At least six of the ten Committee members must be present for the vote. Committee  
27 members may submit requests for reimbursement incurred by their own firms. However, no  
28 committee member may vote on requests for reimbursement submitted by their own firm.

1 If the Cost Reimbursement Committee recommends the cost be paid from the Fund, and a  
2 majority of the Individual Plaintiffs' Liaison Counsel agree, then the invoice shall be submitted to  
3 the Fund administrator for payment without delay. If the Cost Reimbursement Committee does not  
4 recommend the cost be paid from the Fund, or a majority of Liaison Counsel do not believe the  
5 cost should be paid as a common cost, the attorney who submitted it may seek review from the  
6 Special Referee. The Special Referee's decision shall be binding and any costs incurred for  
7 engaging the Special Referee shall be paid from the Fund.

#### 8 **IV. REIMBURSEMENT OF OTHER SHARED COSTS**

9 The following costs shall be considered Common Costs and qualify for reimbursement from  
10 the Common Cost Fund:

- 11 • Court, filing, and service costs related to the liability phase of litigation;
- 12 • Court reporter and interpreter costs for court hearings and/or depositions  
13 (including, but not limited to, transcripts and videos);
- 14 • Document (both electronic and hard copy) depository creation, operation,  
15 staffing, equipment, and administration;
- 16 • Cost(s) of preservation of evidence, including for transport and storage of  
17 physical evidence related to the liability phase of the litigation;
- 18 • Individual Plaintiffs' group administration matters such as meetings and  
19 conference calls;
- 20 • Legal, tax, and accountant fees relating to the Fund;
- 21 • External printing, copying, coding, and scanning related to the above;
- 22 • Research by outside third-party vendors, third-party consultants, or third-party  
23 attorneys, approved by the Individual Plaintiffs' Steering Committee and  
24 Liaison Counsel. For clarity, research conducted by attorneys for any firm  
25 representing plaintiffs in this matter is not a reimbursable cost;
- 26 • Translation costs related to the liability phase of litigation;
- 27 • Bank or financial institution charges related to the Fund;
- 28 • CPA charges related to the review or allocation of Fund;

- Investigative services related to the liability phase of litigation;
- Fees and costs of the Fund’s administrator; and
- Special Referee charges.

Travel costs, meals, lodging for attorneys, and similar expenses are not Common Costs and shall not be reimbursed from the Fund.

Any firm representing Individual Plaintiffs in this action shall submit an invoice for any Other Shared Costs, as articulated herein, for which they seek reimbursement to Liaison Counsel. Liaison Counsel shall review the invoice and, within fourteen days of the invoice’s submission, either 1) return the invoice to the submitting attorney for clarification, comment, revision, and/or amendment, or 2) agree that it should be paid and then submit it to the Fund administrator for payment without delay. If Liaison Counsel disagrees, then the invoice shall be sent to the Special Referee for determination as set forth above.

#### **V. COMMON COST FUND ASSESSMENT**

Each case or claim involving an Individual Plaintiff in which a judgment is entered or in which a settlement is reached, whether or not they have filed a complaint, shall be assessed for costs and expenses a total of one percent (1%) (“the Assessment”) of the amount of the judgment or settlement. The Assessment serves the purpose of replenishing the Common Costs Fund and reimbursing the firms that advanced the costs incurred for the common benefit of the Individual Plaintiffs.

The Assessment shall be based upon the gross proceeds of the judgment or settlement, including the present cash value of any payment that is structured in whole or in part.

With one limited exception, set forth below, judgments and settlement funds shall be deposited directly by the Payor (including, but not limited to, the Edison Defendants) to the Individual Plaintiffs’ Qualified Settlement Fund (“IPQSF”), which will be managed by Simpluris, Inc. Simpluris is headquartered in Costa Mesa, CA, and carries several layers of insurance. Simpluris will hold the funds in the IPQSF and all such funds will be fully FDIC insured. When Payor funds are deposited into the IPQSF, Simpluris will promptly account for those funds and

1 distribute 99% to the respective counsel for that individual plaintiff within two (2) business days  
2 and retain the 1% Assessment.

3 The limited exception is if a settlement is reached under which all settlement funds are to be  
4 deposited by the Payor into a *different* qualified settlement fund that is also approved by this Court.  
5 In that circumstance, then the administrator of this separate QSF appointed by the Court shall be  
6 obligated to remit the 1% assessment on the gross proceeds to the IPQSF within two business days  
7 of receipt of settlement funds into the QSF.

8 If an Individual Plaintiff elects to use a separate QSF and have the Individual Plaintiff's  
9 funds deposited into this separate QSF, then the attorney for that Individual Plaintiff must notify  
10 Simpluris of the confidential information set forth below within two business days of the settlement  
11 agreement being signed by the Individual Plaintiff by sending an email to the following address:  
12 [info@EatonFireIPQSF.com](mailto:info@EatonFireIPQSF.com):

- 13 (1) the name(s) of the Individual Plaintiff(s) covered by the settlement;
- 14 (2) the date on which the settlement agreement was signed by the Individual  
15 Plaintiff(s);
- 16 (3) the amount of the settlement for the Individual Plaintiff(s) subject to the  
17 settlement agreement;
- 18 (4) the date upon which the funds are due to the separate QSF; and
- 19 (5) the name and contact information of the administrator for the separate QSF  
20 responsible for sending the 1% holdback to the IPQSF.

21 Simpluris shall hold all of this information in strict confidence, and, except as set forth  
22 herein, shall not disclose this information to any other parties or attorneys (including Individual  
23 Plaintiffs' Liaison Counsel), as long as the administrator for the Individual Plaintiff's separate QSF  
24 pays the 1% holdback to the IPQSF within the two business days of receipt of the funds as required  
25 by this Order.

26 In the event that the administrator for the separate QSF does not send the 1% holdback to  
27 the IPQSF within the required two business days, then Simpluris shall immediately notify the  
28 Individual Plaintiff's Counsel and the separate QSF administrator that their payment obligation is

1 outstanding. If the 1% holdback is not paid to the IPQSF within two additional business days, then  
2 Simpluris shall immediately send an email notifying the Committee and Individual Plaintiffs  
3 Liaison Counsel of the name of the individual plaintiffs' firm and the amount of the 1% owed to  
4 the following addresses: [eatonexpertfeecommittee@singletonschreiber.com](mailto:eatonexpertfeecommittee@singletonschreiber.com); [alr@coreylaw.com](mailto:alr@coreylaw.com);  
5 [gsingleton@singletonschreiber.com](mailto:gsingleton@singletonschreiber.com); and [ravipudi@panish.law](mailto:ravipudi@panish.law). The Committee and Individual  
6 Plaintiffs Liaison Counsel shall then seek payment of the 1% to the IPQSF from the individual  
7 plaintiffs' firm from whom it is owed.

8 As the funds in the IPQSF build, the Individual Plaintiffs Liaison Counsel and Plaintiffs'  
9 Steering Committee who contributed to the Common Costs Fund will be reimbursed on a pro rata  
10 basis.

11 Individual Plaintiffs' Liaison Counsel may apply to the Court for a reduction of the amount  
12 of the Assessment if it appears that the 1% holdback overestimates what is necessary for common  
13 costs and expenses.

14 Simpluris will retain any interest accrued on the Assessment funds held in the IPQSF as its  
15 fee for services.

16 Any unused portion of the 1% shall be returned to counsel for the Individual Plaintiffs on a  
17 pro rata basis at the conclusion of all cases in the Eaton Fire litigation.

## 18 **VI. ACCOUNTING, RECORD KEEPING AND ADMINISTRATION**

19 In consultation with the Steering Committee, Individual Plaintiffs' Liaison Counsel shall  
20 select an administrator to maintain custody and possession of the Fund and make payments from  
21 the Fund. The administrator's fees and costs shall be paid from the Fund and the administrator shall  
22 maintain appropriate documentation and records of any common benefit costs and expenses  
23 incurred. Such documentation of costs and expenses incurred shall specify the type of cost and  
24 reason it constitutes a reimbursable common cost.

25 The administrator shall provide a monthly accounting of the costs and expenses that have  
26 been incurred from the Fund, together with the balance in the Fund, to the Special Referee and to  
27 Liaison Counsel, who shall then provide it to the Steering Committee. These monthly reports shall  
28 be maintained as part of the joint prosecution of the cases by the Individual Plaintiffs and shall



1 constitute individual plaintiffs' work product and shall not be discoverable.

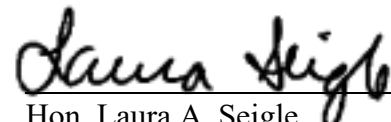
2 If Liaison Counsel or any member of the Steering Committee who has any concerns about  
3 any expenses paid by the Fund, they shall immediately address the issue with the Special Referee,  
4 who shall be empowered to resolve any disputes.

5 If any monies remain in the Fund after all the Individual Plaintiff cases have been resolved  
6 and dismissed, then the administrator shall reimburse the remaining funds on a pro rata basis to  
7 counsel for all plaintiffs that paid a common cost assessment, minus any reasonable administrative  
8 expenses. Prior to any such reimbursement, the administrator must seek the approval of Liaison  
9 Counsel and the Special Referee. Once the Special Referee has approved of the final  
10 reimbursement amounts, the administrator shall issue the reimbursements.

11 **IT IS SO ORDERED.**

12  
13 Dated: 09/18/2025



14   
15 Hon. Laura A. Seigle  
16 Judge of the Superior Court  
17 Laura A. Seigle / Judge  
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**EATON FIRE CASES**  
**25STCV00731 (Lead Case – Gurse)**

**PROOF OF SERVICE**

I am over the age of eighteen years and not a party to the within action. I am employed by Singleton Schreiber, LLP, whose business address is 591 Camino de la Reina, Suite 1025, San Diego, CA 92108.

On September 19, 2025, I served the within document(s) described as:

**FILED - CASE MANAGEMENT ORDER No. 8 Re: Individual Plaintiffs Common Costs Reimbursement and Costs Assessment**

on the interested parties in this action pursuant to the most recent Omnibus Service List by submitting an electronic version of the document via file transfer protocol (FTP) to Case Anywhere through the upload feature at [www.caseanywhere.com](http://www.caseanywhere.com).

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

Executed on September 19, 2025, at Long Beach, California.



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Denise Romero