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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

**EXHIBITS TO [JOINT PROPOSED]
CASE MANAGEMENT ORDER No. 6
Re Individual Plaintiff Liability
Questionnaire; First Amended
Preservation Order**

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EXHIBIT A

EATON FIRE LITIGATION
LEAD CASE NO. 25STCV00731
INDIVIDUAL PLAINTIFF LIABILITY QUESTIONNAIRE

The Individual Plaintiff Liability Questionnaire shall be completed in accordance with the requirements and guidelines set forth in the applicable Case Management Order. The Individual Plaintiff Liability Questionnaire does not alter Individual Plaintiffs' preservation obligations, including under the April 3, 2025 Preservation Order.

The Individual Plaintiff Liability Questionnaire may be completed by an individual plaintiff or by multiple individual plaintiffs within a household. If the questionnaire is completed by a household, then (1) responses must be obtained from every member of the household who is 13 years or older; (2) documents in response to the requests for production must be obtained (to the extent they exist) from every member of the household regardless of age; and (3) every individual plaintiff that is required to complete the Individual Plaintiff Liability Questionnaire must do so and verify their response. An Authorized Representative must complete the form for individual plaintiffs who are minors, deceased, or incapacitated and for entity plaintiffs. An Authorized Business Representative must complete the form for business entity plaintiffs. An Authorized Representative must complete the form for any trust that is an owner of property.

This Individual Plaintiff Liability Questionnaire shall be completed within the BrownGreer portal. Once complete, each Individual Plaintiff Liability Questionnaire must be served upon Defendants by uploading a Zip File (containing BrownGreer's Household Identification Number and Last Name in the filename) of PDF versions of the completed documents to Defendants' ShareFile. To access the ShareFile, counsel for Individual Plaintiffs should contact sce-eatonfire_support@hueston.com to receive a firm-specific link. The documents must be named using the following naming convention:

- Individual Plaintiff Liability Questionnaire: EATON.IPLQ.HHID3XXXXX.

Responsive documents must be Bates numbered prior to service on Defendants using the following naming convention starting with: HHID3XXXXXX.000001.

A. Plaintiff Information

1. Provide the following information for the case filed:
 - a. Original Case Name _____
 - b. Original Case Number _____
 - c. Law Firm (if represented) _____
2. For each plaintiff on this Liability Questionnaire, please provide the following information:
 - a. Plaintiff Type
 - Individual
 - Business
 - Trust
 - Estate
 - b. Individual Plaintiff Name (First, Middle, Last) or Entity Name
 - c. Individual Plaintiff Date of Birth
3. If any plaintiff on this Liability Questionnaire is a minor, deceased, or incapacitated, please complete the following:
 - a. Individual Plaintiff Name of minor, deceased, or incapacitated household member (First, Middle, Last)
 - b. Minor, deceased, or incapacitated?
 - c. Name of individual representing the minor, deceased, or incapacitated household member (First, Middle, Last)
 - d. Relationship to Plaintiff
 - e. Capacity in which this individual is representing the minor, deceased, or incapacitated household member
 - f. If the representing individual was appointed as a representative by a court, provide the State, Court, and Case Number:
 - State
 - Court
 - Case Number
 - g. State the date and place of death of decedent (if applicable):
 - Date
 - Place
4. If any plaintiff on this Liability Questionnaire is a business or non-business entity, please provide the following information, if applicable:
 - a. Authorized Representative name (First, Middle, Last)
 - b. Business Address (If applicable)
 - c. Entity Name
5. For each Trust Plaintiff on this Liability Questionnaire asserting a claim:

- a. Trust Plaintiff name
 - b. Trustee name(s) (First, Middle, Last)
6. For each Estate Plaintiff on this Liability Questionnaire asserting a claim:
- a. Estate name
 - b. Personal Representative name(s) (First, Middle, Last)

B. Questions (Answer for each plaintiff in the household who is age 13 or older)

1. Do you believe you witnessed the EATON FIRE ignite?
YES ___ NO ___

If yes, did you see:

- a. Downed power lines or utility poles? Yes ___ No ___
- b. Exploding transformers? Yes ___ No ___
- c. Sparking lines or wires? Yes ___ No ___
- d. Trees or tree branches falling onto power lines? Yes ___ No ___
- e. Other electrical or utility equipment failures? Yes ___ No ___
- f. Any other event that you believe potentially caused or contributed to the ignition or spread of the fire? Yes ___ No ___
- g. If your answer to 1(f) is Yes, please explain:

Also, if you answered yes to any of the questions in Question 1, please specify the date and time you witnessed the event(s), including your location and address at the time of your observation:

Date/Time _____
 Location _____
 Address _____
 City _____
 Zip Code _____

2. Do you know someone who may have witnessed the fire ignite or said they did? YES _____ NO _____

If yes, please provide the name, address and phone number for each such individual (represented parties will not be directly contacted and will only be contacted through their counsel):

Name _____
Address _____
Phone _____
Email Address _____

3. Please identify any person who took and/or prepared any of the photos, videotapes, and/or digital/thermal renderings that are you producing in response to the Requests set forth in part C below, if known.

Name _____
Address _____
Phone _____
Email Address _____
Related Bates Number(s) _____

4. Other than what you might have seen or read in the news or media (including social media), do you have any personal knowledge of SCE or SCE's equipment causing or contributing to the ignition and/or spread of the EATON FIRE?
YES ____ NO _____

If yes, describe what you know and the source of your knowledge (for example, did someone tell you this information and/or do you have documents related to this information?):

5. Other than what you might have seen or read in the news or media (including social media), do you have any personal knowledge of any person or entity other than SCE causing or contributing to the ignition and/or spread of the EATON FIRE?
YES ____ NO ____

If yes, describe what you know and the source of your knowledge (for example, did someone tell you this information and/or do you have documents related to this information):

6. Have you communicated with any third party who claims to have personal knowledge of SCE or SCE's equipment causing or contributing to the ignition and/or spread of the EATON FIRE?
YES ____ NO ____

If yes, identify the person(s) by name and occupation (if known), as well as their relationship to you, and what they told you:

7. Have you communicated with any third party who claims to have personal knowledge of any person or entity (other than SCE) causing or contributing to the ignition and/or spread of the EATON FIRE?

YES ____ NO ____

If yes, identify the person(s) by name and occupation (if known), as well as their relationship to you, and what they told you:

8. Did you receive any official/governmental evacuation notices in January 2025 prior to or during the Eaton Fire?

YES ____ NO ____

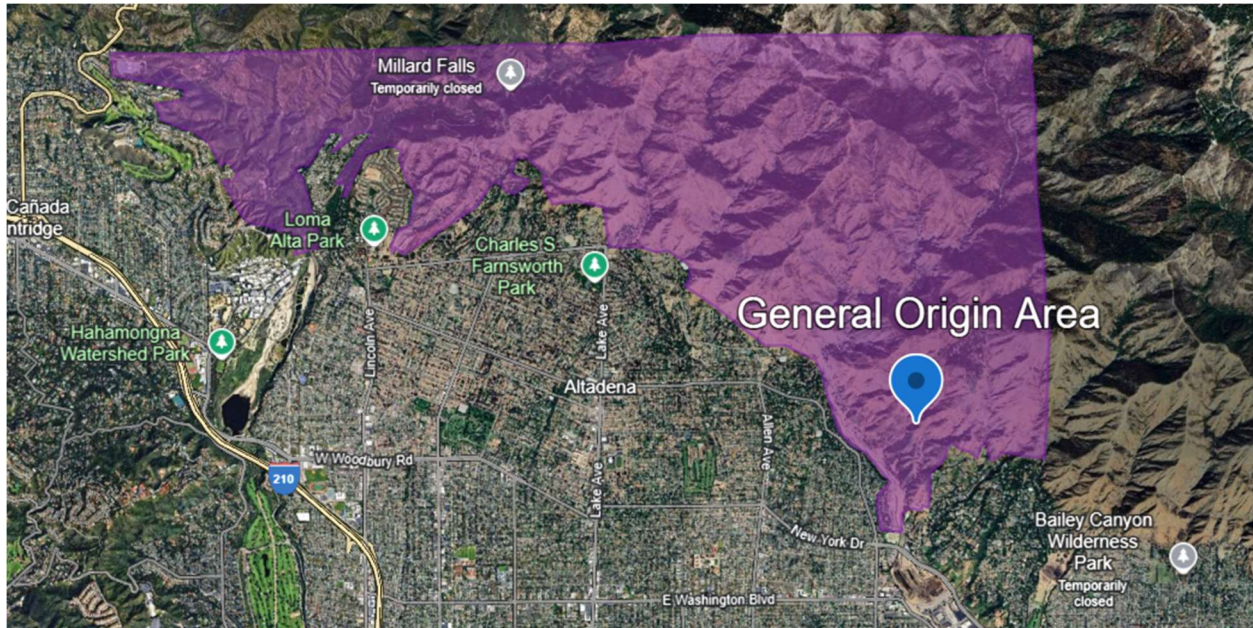
If yes, state your name and state when you received any evacuation notices and who provided the evacuation notice:

C. Requests for Production (Provide responsive documents for any Plaintiff in the household, regardless of age)

No	Description	Has Documents and Will Produce	Does Not Have Documents	Other
1	All documents or communications received via any public record request relating to the Eaton Fire.			
2	All photos, videos, digital and/or thermal renderings that show Eaton Canyon (the area depicted in larger the map in Appendix A) between 5:30 pm January 7, 2025 and 5:30 pm January 8, 2025 (produced in native format).			
3	All photos, videos, security camera recordings, doorbell recordings, and digital and/or thermal renderings that show the Eaton Fire (including fire, sparks, smoke, ash), including through the residential area where the fire reached, between 5:30 pm January 7, 2025 and 5:30 pm January 8, 2025 (produced in native format).			
4	All photos, videos, and/or digital/thermal renderings that show the ignition or cause of the Eaton Fire (including any flashes, sparks, light, arcing, or other abnormal electrical event) taken between 5:30 pm January 7, 2025 and 7:30 pm January 7, 2025 (produced in native format).			
5	All video or photographs in your possession that were taken in Eaton Canyon (the area depicted in the smaller map in Appendix B) between September 1, 2024 and January 8, 2025, inclusive (produced in native format).			

No	Description	Has Documents and Will Produce	Does Not Have Documents	Other
6	All photos, videos, digital and/or thermal renderings that show electrical facilities and/or equipment SCE owns and/or operates in the “General Origin Area” (as that term is used in the Master Complaint and as depicted in the smaller map in Appendix B around coordinates around coordinates N34.1860422292 W118.09357612511549) taken between 5:30 pm January 7, 2025 and 7:30 pm January 7, 2025 (produced in native format).			
7	All official/governmental evacuation notices you received on January 6, 7, and/or 8, 2025.			

APPENDIX A
TO INDIVIDUAL PLAINTIFF LIABILITY QUESTIONNAIRE



The outlined area in purple signifies non-residential areas of Eaton Canyon for purposes of the Individual Plaintiff Liability Questionnaire. Please use this map to refer to Request for Production No. 2.

The “General Origin Area,” as that term is used in the Master Complaint around coordinates N34.1860422292 W118.09357612511549, is depicted by the placemark.

APPENDIX B
TO INDIVIDUAL PLAINTIFF LIABILITY QUESTIONNAIRE



The outlined area in green signifies the area around the General Origin Area for purposes of the Individual Plaintiff Liability Questionnaire. Please use this map to refer to Request for Production Nos. 5 and 6.

The "General Origin Area," as that term is used in the Master Complaint around coordinates N34.1860422292 W118.09357612511549, is depicted by the placemark.

VERIFICATION

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

)
) **ss.**
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I, _____, declare:

I have read the foregoing **INDIVIDUAL PLAINTIFF LIABILITY QUESTIONNAIRE** and know its contents.

[If individual:] I am a party to this action. The matters stated in the foregoing document are true of my own knowledge.

[If guardian ad litem:] I am the duly appointed guardian ad litem for _____, a _____, in this action, and am authorized to make this verification for and on their behalf, and I make this verification for that reason. I am informed and believe and, on that ground, verify that the matters stated in the foregoing document are true.

[If entity or estate:] I am an agent of _____, a party to this action, and am authorized to make this verification for and on their behalf, and I make this verification for that reason. I am informed and believe and, on that ground, verify that the matters stated in the foregoing document are true.

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

Executed on this _____ day of _____, 2025, at _____,
_____.

[INSERT NAME]

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EATON FIRE CASES
25STCV00731 (Lead Case – Gurse)
ELECTRONIC PROOF OF SERVICE

I am over the age of 18 years and not a party to the within action. I am employed by Hueston Hennigan LLP whose business address is 620 Newport Center Drive, Suite 1300, Newport Beach, CA 92660.

On July 10, 2025, I caused to be served the following document(s) described as:
EXHIBITS TO [JOINT PROPOSED] CASE MANAGEMENT ORDER No. 6 Re Individual Plaintiff Liability Questionnaire; First Amended Preservation Order
on the interested parties in this action pursuant to the most recent Omnibus Service List by submitting an electronic version of the document(s) via file transfer protocol (FTP) to Case Anywhere through the upload feature at 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 July 10, 2025, at Newport Beach, California.

/s/ Tina Gonzalez _____
Tina Gonzalez