PANISH | SHEA | RAVIPUDI LLP
Rahul Ravipudi (SBN 204519)
11111 Santa Monica Blvd, Ste 700
Los Angeles, CA 90025
Phone: (310) 477-1700
ravipudi@panish.law

SINGLETON SCHREIBER, LLP
Gerald Singleton (SBN 208783)
591 Camino De La Reina, Ste 1025
San Diego, CA 92108-3112
Phone: (619) 771-3473
gsingleton@singletonschreiber.com

COREY, LUZAICH, DE GHETALDI & RIDDLE LLP
Amanda L. Riddle (SBN 215221)
700 El Camino Real
Millbrae, CA 94030
Phone: (650) 871-5666
alr@coreylaw.com

Liaison Counsel for Individual Plaintiffs

FILED
Superior Court of California
County of Los Angeles
04/16/2026
David W. Slayton, Executive Officer / Clerk of Court
By: N. Navarro Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – SPRING STREET

EATON FIRE CASES JEREMY GURSEY, Individually, Plaintiff, vs. SOUTHERN CALIFORNIA EDISON COMPANY, a California corporation, and EDISON INTERNATIONAL, a California corporation, Defendants.	Case No. 25STCV00731 **AND ALL RELATED CASES** Hon. Laura A. Seigle **~~[PROPOSED~~] AMENDED CASE MANAGEMENT ORDER No. 8 Re: Individual Plaintiffs Common Costs Reimbursement and Costs Assessment**

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I. GENERAL PROVISIONS

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

Individual Plaintiffs' Liaison Counsel and the Steering Committee have approved and jointly stipulated to the entry of this Order, the contents of which were presented to all Individual Plaintiffs counsel.[1] Any firm that wishes to "opt-out" of the joint cost sharing may do so by notifying Liaison Counsel within thirty (30) days after this CMO is filed. Any firm that exercises its right to opt-out shall receive a refund of any funds it contributed to the joint cost-sharing account, shall be removed from the Steering Committee (if applicable), and shall not be subject to the terms of this CMO. Firms that decide to opt-out shall not be entitled to access any of the materials that are paid for through the joint cost-sharing agreement.

THE COURT ISSUES THIS ORDER:

- Appointing a Special Referee under California Code of Civil Procedure §638(b) to oversee requests and disputes for reimbursement of costs and expenses from the Fund;

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[1] The Edison Defendants did not stipulate to or agree to CMO No. 8 and believe such an order is neither necessary nor appropriate. Nothing herein shall be construed as a waiver of, or consent to, CMO No. 8 by the Edison Defendants. The Edison Defendants expressly preserve and reserve all objections to CMO No. 8. The Edison Defendants' compliance with CMO No. 8 shall not be deemed an agreement or stipulation to any of the terms thereof.

- Establishing a process by which Individual Plaintiffs' counsel can seek reimbursement of common costs related to the liability phase of the case and 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.

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.

III. REIMBURSEMENT OF LIABILITY EXPERT COSTS

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

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

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

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

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

IV. REIMBURSEMENT OF OTHER SHARED COSTS

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

- Court, filing, and service costs related to the liability phase of litigation;
- Court reporter and interpreter costs for court hearings and/or depositions (including, but not limited to, transcripts and videos);
- Document (both electronic and hard copy) depository creation, operation, staffing, equipment, and administration;
- Cost(s) of preservation of evidence, including for transport and storage of physical evidence related to the liability phase of the litigation;
- Individual Plaintiffs' group administration matters such as meetings and conference calls;
- Legal, tax, and accountant fees relating to the Fund;
- External printing, copying, coding, and scanning related to the above;
- Research by outside third-party vendors, third-party consultants, or third-party attorneys, approved by the Individual Plaintiffs' Steering Committee and Liaison Counsel. For clarity, research conducted by attorneys for any firm representing plaintiffs in this matter is not a reimbursable cost;
- Translation costs related to the liability phase of litigation;

- Bank or financial institution charges related to the Fund;
- 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

Subject to the limitations set out in Section VII, each case or claim involving an Individual Plaintiff in which a judgment is entered or in which a settlement is reached 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 distribute 99% to the respective counsel for that individual plaintiff within two (2) business days and retain the 1% Assessment.

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

If an Individual Plaintiff elects to use a separate QSF and have the Individual Plaintiffs funds deposited into this separate QSF, then the attorney for that Individual Plaintiff must notify Simpluris of the confidential information set forth below within two business days of the settlement agreement being signed by the Individual Plaintiff by sending an email to the following address: info@EatonFireIPQSF.com:

(1) the name(s) of the Individual Plaintiff(s) covered by the settlement;

(2) the date on which the settlement agreement was signed by the Individual Plaintiff(s);

(3) the amount of the settlement for the Individual Plaintiff(s) subject to the settlement agreement;

(4) the date upon which the funds are due to the separate QSF; and

(5) the name and contact information of the administrator for the separate QSF responsible for sending the 1% holdback to the IPQSF.

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

In the event that the administrator for the separate QSF does not send the 1% holdback to the IPQSF within the required two business days, then Simpluris shall immediately notify the Individual Plaintiffs Counsel and the separate QSF administrator that their payment obligation is outstanding.

If the 1% holdback is not paid to the IPQSF within two additional business days, then Simpluris shall immediately send an email notifying the Committee and Individual Plaintiffs Liaison Counsel of the name of the individual plaintiffs' firm and the amount of the 1% owed to the following addresses: eatonexpertfeecommittee@singletonschreiber.com; alr@coreylaw.com; ravipudi@panish.law; and gsingleton@singletonschreiber.com.

The Committee and Individual Plaintiffs Liaison Counsel shall then seek payment of the 1% to the IPQSF from the individual plaintiffs' firm from whom it is owed.

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

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

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

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

VI. ACCOUNTING, RECORD KEEPING AND ADMINISTRATION

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

The administrator shall provide a monthly accounting of the costs and expenses that have been incurred from the Fund, together with the balance in the Fund, to the Special Referee and to Liaison Counsel, who shall then provide it to the Steering Committee. These monthly reports shall be maintained as part of the joint prosecution of the cases by the Individual Plaintiffs and shall constitute individual plaintiffs' work product and shall not be discoverable.

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

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

VII. <u>LIMITATIONS TO SECTION V</u>

The Assessment and the provisions of Section V of CMO No. 8 shall apply to a settlement reached outside of litigation only if both of the following conditions are satisfied at the time of execution of the settlement agreement:

(1) the claimant has an active complaint pending in the Eaton Fire Litigation (Lead Case No. 25STCV00731 and Related Cases); and

(2) the claimant is represented by counsel in the Eaton Fire litigation.

For settlements reached through SCE's Wildfire Recovery Compensation Program that the Edison Defendants are aware meet the two preceding conditions (a "Qualifying WRCP Settlement"), the Edison Defendants shall deposit the full settlement funds directly into the IPQSF (or a separate QSF) in accordance with Section V.

Consistent with Section V, upon deposit of Qualifying WRCP Settlement funds into the IPQSF, Simpluris, Inc. shall promptly account for those funds, distribute ninety-nine percent (99%) to the respective counsel within two (2) business days, and retain the one percent (1%) Assessment.

Alternatively, upon deposit of the Qualifying WRCP Settlement funds into a separate QSF pursuant to the exception described in Section V, the administrator of the separate QSF shall be obligated to remit the 1% assessment on the gross proceeds to the IPQSF under the terms described in Section V and Simpluris will adhere to the same confidentiality terms as provided herein.

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Nothing in CMO No. 8 or any dispute arising therefrom, shall in any way infringe upon, impair, or impede any settlement reached between a claimant and the Edison Defendants.

Any dispute concerning the Assessment or any other provision of CMO No. 8 shall be resolved solely as between the affected plaintiffs' counsel and/or the IPQSF administrator, and not the Edison Defendants, and shall have no bearing on the underlying settlement between the individual and the Edison Defendants.

In the event that any plaintiff believes they should not be subject to the 1% assessment set forth in CMO No. 8, the plaintiff will raise that issue with the Special Referee appointed by this Court to oversee CMO No. 8, the Hon. Gail A. Andler (Retired Judge of the California Superior Court). Judge Andler shall be authorized to make the decision as to whether any plaintiff has been properly assessed the 1% for common costs pursuant to this CMO.

On the first of every month, the Edison Defendants shall provide a list of all plaintiffs who have Qualifying WRCP Settlements for whom a settlement has been paid within an agreed-upon 30 day period.

IT IS SO ORDERED.

Dated: 04/16/2026

Hon. Laura A. Seigle
Judge of the Superior Court
Laura A. Seigle / Judge

EATON FIRE CASES

25**STC**V00731 (**Lead Case** – ***Gursey***)

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 April 8, 2026, I served the within document(s) described as:

[**PROPOSED**] **AMENDED 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.

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

Executed on April 8, 2026, at Temecula, California.

____

Samantha Mora