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1 2 3 4 5 6 7 8 9 10 11 12 13 14	CLARENCE, DYER & COHEN LLP KATE DYER (SBN 171891) kdyer@clarencedyer.com 899 Ellis Street San Francisco, CA 94109 Telephone: (415) 749-1800 Facsimile: (415) 749-1694 LATHAM & WATKINS LLP JOHN J. LYONS (SBN 71758) john.lyons@lw.com 355 South Grand Avenue Los Angeles, CA 90071-1560 Telephone: (213) 891-8320 Facsimile: (213) 891-8763 SEDGWICK LLP GAYLE L. GOUGH (SBN 154398) gayle.gough@sedgwicklaw.com One Market Plaza Steuart Tower, 8th Floor San Francisco, CA 94105-1008 Telephone: (415) 781-7900 Facsimile: (415) 781-2635 Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY; And PG&E CORPORATION	In the Substance Country in the Substance Coun
15 16 17	SUPERIOR COURT OF THE IN AND FOR THE COU	
18 19 20 21 22 23	Coordination Proceeding Special Title (Rule 3.550) <u>PG&amp;E "SAN BRUNO FIRE" CASES</u> <u>TORT ACTIONS</u>	JCCP No. 4648 A <u>TORT ACTIONS</u> DEFENDANTS PACIFIC GAS AND ELECTRIC COMPANY AND PG&E CORPORATION'S MASTER ANSWER TO PLAINTIFFS' UNVERIFIED MAGTER COMPLAINT
24 25 26		MASTER COMPLAINT Before the Honorable Steven L. Dylina Department 7 BY FAX
27 28 SF/2275576v1	Company and PG&E Corporation (hereinafter re	

plaintiffs' unverified Master Complaint and the adoption forms filed and to be filed by plaintiffs 1 (hereinafter collectively referred to as the "Complaint"). Further, pursuant to the stipulation of 2 the parties set forth in paragraph 7 of the Initial Case Management Conference, answering 3 defendants reserve all rights and may also challenge the adoption of the Master Complaint as to 4 5 any particular plaintiff on grounds that are not generally applicable to the Master Complaint. Pursuant to California Code of Civil Procedure section 431.30, in answering the 1. 6 Complaint, answering defendants generally deny each allegation of the unverified Complaint. 7 As separate and affirmative defenses and in answer to the Complaint, answering defendants 8 allege: 9 The claims alleged in the Complaint fail to state facts sufficient to constitute a 2. 10 cause of action against answering defendants. 11 The claims alleged in the Complaint are barred, in whole or in part, by the 3. 12 applicable statute of limitations, including but not limited to California Code of Civil Procedure 13 section 338. 14 4. The claims alleged in the Complaint are barred, in whole or in part, by law for 15 lack of jurisdiction, including but not limited to California Public Utilities Code section 1759. 16 The claims alleged in the Complaint are barred, in whole or in part, by accord 5. 17 18 and satisfaction, payment and release, or estoppel. The injuries or losses alleged in the Complaint were directly and proximately 6. 19 caused, in whole or in part, by unforeseeable, intervening and/or superseding acts of persons or 20entities other than answering defendants for whom answering defendants are not accountable. 21 To the extent the allegations in the Complaint are based on compliance with 7. 22 applicable federal laws, regulations and rules, such claims are preempted by federal law. 23 8. The injuries or losses alleged in the Complaint are subject to the requirements of 24 the principles of mitigation. 25 The injuries or losses alleged in the Complaint may have been caused, in whole 9. 26 or in part, by persons or entities, other than answering defendants, who may have been legally 27 responsible under the doctrine of comparative negligence, contributory negligence, or otherwise 28

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TORT ACTIONS: DEFENDANTS PG&E AND PG&E CORP.'S MASTER ANSWER TO MASTER COMPLAINT

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1	at fault, for which the law provides apportionment of fault, reduction, off-set, indemnification or		
2	contribution.		
3	10. The provisions of California Civil Code section 1431.2 are applicable to the		
4	Complaint.		
5	11. The claims alleged in the Complaint are barred, in whole or in part, by lack of		
6	capacity or standing.		
7	12. The claims in the Complaint are barred, in whole or in part, because they do not		
8	meet the requirements of California Code of Civil Procedure sections 377.30 or 377.60, et seq.		
9	13. The claims in the Complaint are barred, in whole or in part, because the		
10	Complaint fails to join one or more necessary and/or indispensable parties.		
11	14. The claims in the Complaint are barred, in whole or in part, because they have		
12	been improperly joined in this action or proceeding.		
13	15. Answering defendants allege that they complied with the applicable laws,		
14	regulations, and rules and such compliance demonstrates that due care and reasonable prudence		
15	were exercised.		
16	16. The claims in the Complaint are barred, in whole or in part, because there is no		
17	private right of action concerning matters regulated under applicable federal laws, regulations,		
18	and/or other rules and requirements.		
19	17. Alleged causes of action that are not pleaded in the Master Complaint are not at		
20	issue or the subject of the proceeding.		
21	18. Any allegations in the Complaint of deceit or misrepresentation fail to allege the		
22	circumstances with particularity.		
23	19. The claims in the Complaint, to the extent they arose from events occurring out-		
24	of-state, are barred, in whole or in part, under principles of due process.		
25	20. The claims in the Complaint are barred, in whole or in part, because materials		
26	and matters alleged and complained about in the Complaint were consistent with available		
27	technological, scientific and industrial state-of-the art and in compliance with applicable		
28	regulations, and alternative product or facility design was not feasible or practical.		

1	21. To the extent the claims are premised, in whole or in part, on alleged statements	
2	or conduct in judicial, legislative, or administrative proceedings, such claims are barred under	
3	the Noerr-Pennington doctrine and analogous provisions under the laws of California.	
4	22. Under the circumstances alleged in the Complaint, restitution and/or	
5	disgorgement are not an appropriate remedy.	
6	23. Any claim by plaintiffs for disgorgement is barred because any money or	
7	property was not acquired by means of unfair competition or by means of any act in violation of	
8	Business & Professions Code sections 17200 et seq.	
9	24. The allegations in the Complaint do not permit the issuance or entry of injunctive	
10	relief.	
11	25. Alleged acts or omissions in the Complaint causing a nuisance on land were	
12	unintentional and non-negligent and, therefore, not actionable.	
13	26. The alleged acts in the Complaint were performed pursuant to statutory	
14	authority, and thus cannot constitute a nuisance.	
15	27. The allegations in the Complaint fail to state facts sufficient to support an award	
16	of exemplary or punitive damages against answering defendants.	
17	28. The Complaint fails to state a cause of action for which pre-judgment interest,	
18	expert fees, or attorneys' fees may be awarded.	
19	29. The damages alleged in the Complaint are not permitted by law or equity.	
20	30. No alleged act or omission of answering defendants was oppressive, fraudulent,	
21	or malicious under California Civil Code section 3294, and therefore, any award of punitive	
22	damages is barred. Any claim for punitive damages also is barred under California Civil Code	
23	section 3294(b).	
24	31. No alleged act or omission of answering defendants was willful under California	
25	Public Utilities Code section 2106, and therefore, any award of punitive damages is barred.	
26	32. The claims in the Complaint for punitive damages are barred, in whole or in part,	
27	because they violate state and federal constitutional rights, including but not limited to due	
28	process, equal protection, and ex post facto provisions; the Fourth, Fifth, Sixth, Eighth and	
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1	Equation the Amondmental and the right not to be subjected to excessive expende and multiple
1	Fourteenth Amendments; and the right not to be subjected to excessive awards and multiple
2	punishments; and any claim for punitive damages is limited by state and federal law, including
3	but not limited to the United States Supreme Court's decision in <i>State Farm Mutual Automobile</i>
4	Ins. Co. v. Campbell (2003) 123 S. Ct. 1513.
5	Inasmuch as the Complaint and/or Adoption Forms do not describe the claims alleged
6	by each plaintiff with sufficient particularity to enable answering defendants to determine all of
7	the affirmative defenses, answering defendants reserve the right to amend and/or supplement the
8	answer to assert any and all pertinent defenses ascertained through further investigation and
9	discovery. Answering defendants will rely on all defenses that may become available during
10	discovery or trial.
11	WHEREFORE, answering defendants pray for costs of suit, that plaintiffs take nothing,
12	and for such other and further relief that the Court may deem just and proper.
13	DEMAND FOR JURY
14	Answering defendants respectfully request a trial by jury as to all issues so triable in
15	each action subject to the Complaint.
16	
16	DATED: July 5, 2011 Respectfully submitted,
17	
	Here P Mal
17	By: Me Lore
17 18	By: <u>He</u> Jord Kate Dyer Clarence, Dyer & Cohen LLP
17 18 19	By: <u>He Jord</u> Kate Dyer Clarence, Dyer & Cohen LLP
17 18 19 20	By: <u>Je</u> Jord Kate Dyer Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough
17 18 19 20 21	By: <u>He for Jone</u> By: <u>He for Jone</u> Kate Dyer Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP
17 18 19 20 21 22	By: <u>He J</u> John Kate Dyer Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY;
17 18 19 20 21 22 23	By: John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY; and PG&E CORPORATION
17 18 19 20 21 22 23 24	BY: <u>Jee</u> Joy Kate Dyer Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY; and PG&E CORPORATION
17 18 19 20 21 22 23 24 25	By: <u>Harpendary</u> Endersity of Lord By: <u>Harpendary</u> Endersity By: <u>Harpendary</u> Endersity Kate Dyer Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY; and PG&E CORPORATION
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	By: <u>July 5, 2011</u> By: <u>July 5, 2011</u> By: <u>Kate Dyer</u> Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY; and PG&E CORPORATION
17 18 19 20 21 22 23 24 25 26 27	By: <u>Je</u> J. John By: <u>Kate Dyer</u> Clarence, Dyer & Cohen LLP John J. Lyons Latham & Watkins LLP Gayle L. Gough Sedgwick LLP Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY; and PG&E CORPORATION

I

1	PROOF OF SERVICE	
2	I am a resident of the State of California, over the age of eighteen years, and not a party	
3	to the within action. My business address is Sedgwick LLP, One Market Plaza, Steuart Tower,	
4	8th Floor, San Francisco, CA 94105-1008. On July 5, 2011, I served the within document(s):	
5 6	DEFENDANTS PACIFIC GAS AND ELECTRIC COMPANY AND PG&E CORPORATION'S MASTER ANSWER TO PLAINTIFFS' UNVERIFIED MASTER COMPLAINT	
7	FACSIMILE - by transmitting via facsimile the document(s) listed above to the fax number(s) set forth on the attached Telecommunications Cover Page(s) on this date before 5:00 p.m.	
9 10	MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.	
10	PERSONAL SERVICE - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.	
12	$\boxtimes$ E-MAIL – by electronically transmitting the document(s) listed above to the email address(es) of the addressee listed below.	
13 14	OVERNIGHT COURIER - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via Federal Express.	
15		
16	SEE ATTACHED SERVICE LIST	
17	I am readily familiar with the firm's practice of collection and processing correspondence	
18	for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same	
19	day with postage thereon fully prepaid in the ordinary course of business. I am aware that on	
20	motion of the party served, service is presumed invalid if postal cancellation date or postage	
21	meter date is more than one day after date of deposit for mailing in affidavit.	
22	I declare under penalty of perjury under the laws of the State of California that the above	
23	is true and correct. Executed on July 5, 2011, at San Francisco, California.	
24		
25	Amanda L. Henderson	
26		
27		
28		
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## SERVICE LIST SAN BRUNO LITIGATION

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updated 6/30/2011

2	Frank M. Pitre, Esq.	Plaintiffs' Co-Liaison Counsel and Attorneys for
3	Ara Jabagchourian, Esq.	Plaintiffs in:
3	Niki B. Okcu, Esq.	
4	Jessica Curiale, Esq.	Basalski v. Pacific Gas & Electric Company, et al.
	COTCHETT, PITRE & McCARTHY San Francisco Airport Office Center	San Mateo Superior Court Case No. 500364; Bullis, et al. v. Pacific Gas and Electric Company,
5	840 Malcolm Road, Suite 200	<i>et al.</i> San Mateo Superior Court Case No. 499864;
	Burlingame, CA 94010	Chiramberro, et al. v. Pacific Gas and Electric
6	Tel: (650) 697-6000	Company, et al. San Mateo Superior Court Case
-	Fax: (650) 697-0577	No. 499865; DeRenzi, et al. v. Pacific Gas and
7	fpitre@cpmlegal.com	Electric Company, et al. San Mateo Superior Court
8	ajabagchourian@cpmlegal.com	Case No. 500340; Falasco, et al. v. Pacific Gas
0	<u>nokcu@cpmlegal.com</u> jcuriale@cpmlegal.com	and Electric Company, et al. San Mateo Superior Court Case No. 500341; Lillie, et al. v. Pacific Gas
9	tstevens@cpmlegal.com	and Electric Company, et al. San Mateo Superior
	jwang@cpmlegal.com	Court Case No. 500363; <i>Magoolaghan, et al. v.</i>
1(	cwalker@cpmlegal.com	Pacific Gas and Electric Company, et al. San
		Mateo Superior Court Case No. 499867; Maney v.
11		Pacific Gas and Electric Company, et al. San
12		Mateo Superior Court Case No. 500339; <i>Palavos v.</i> <i>Pacific Gas and Electric Company, et al.</i> San
14		Mateo Superior Court Case No. 500366; <i>Pellegrini</i> ,
13		et al. v. Pacific Gas and Electric Company, et al.
		San Mateo Superior Court Case No. 499863;
14		Ruggiero v. Pacific Gas and Electric Company, et
1.	.	al. San Mateo Superior Court Case No. 500365;
1:		Vides, et al. v. Pacific Gas and Electric Company,
- 10	5	et al. San Mateo Superior Court Case No. 499866; Whittemore, et al. v. Pacific Gas and Electric
1		Company, et al. San Mateo Superior Court Case
1′	7	No. 500338. Alash, et al. v. Pacific Gas and
		<i>Electric Company, et al.</i> San Mateo Superior Court
1	3	Case No. 500502; Chew, et al. v. Pacific Gas and
1		<i>Electric Company, et al.</i> San Mateo Superior Court Case No. 500499; <i>Chung, et al. v. Pacific Gas and</i>
1		Electric Company, et al. San Mateo Superior Court
2		Case No. 500557; Hoenisch, et al. v. Pacific Gas
		and Electric Company, et al. San Mateo Superior
2		Court Case No. 500501; Montemarano, et al. v.
		Pacific Gas and Electric Company, et al. San
2	~	Mateo Superior Court Case No. 500558; Shurtz, et al. v. Pacific Gas and Electric Company, et al. San
2	3	Mateo Superior Court Case No. 500559;
		Wynschenk, et al. v. Pacific Gas and Electric
2	4	Company, et al. San Mateo Superior Court Case
2		No. 500500; Barbieri, et al. v. Pacific Gas and
2		<i>Electric Company, et al.</i> San Mateo Superior Court
2	6	Case No. 500783; Silverman, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior
		Court Case No. 500784; Levin, et al. v. Pacific Gas
2	7	and Electric Company, et al. San Mateo Superior
~		Court Case No. 500785; Migos, et al. v. Pacific
2	δ	Gas and Electric Company, et al. San Mateo
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5       San Mateo Superior Court Case No. 501749;         6       Balich v. Pacific Gas and Electric Company, et al.         7       Safinda v. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 501751;         7       Gibson v. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 501996; Electric         9       Mateo Superior Court Case No. 501996; Electric         9       Pacific Gas and Electric Company, et al. San         10       Mateo Superior Court Case No. 501996; Electric         11       Pacific Gas and Electric Company, et al. San         12       Pacific Gas and Electric Company, et al. San         13       Mateo Superior Court Case No. 50230; Pesce v.         14       Pacific Gas and Electric Company, et al. San         15       Mateo Superior Court Case No. 50231; Keerri v.         16       Pacific Gas and Electric Company, et al. San         17       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 50232; Welsh Marcon V.         19       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 50329; Kara v.         19       Pacific Gas and Electric Company, et al. San         19       Pacific Gas and Electric Compan			
2       Matico Superior Court Case No. 50027; Zestrow.         3       San Mateo Superior Court Case No. 50133;         4       San Mateo Superior Court Case No. 501386;         5       San Mateo Superior Court Case No. 501386;         6       San Mateo Superior Court Case No. 501386;         7       Balich v. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 501760;         8       San Mateo Superior Court Case No. 501751;         7       Salindar. N. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 50195; Reida         9       Mateo Superior Court Case No. 50195; Reida         9       Mateo Superior Court Case No. 502096; Carney v.         10       Mateo Superior Court Case No. 502095; Dimatidy         11       W. Pacific Gas and Electric Company, et al. San         12       Mateo Superior Court Case No. 502095; Dimatidy         13       Mateo Superior Court Case No. 502035; Dimatidy         14       Mateo Superior Court Case No. 50253; Perior au         15       Pacific Gas and Electric Company, et al. San         16       Mateo Superior Court Case No. 50253; Perior au         17       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 50353; Pieze N     <	. 1		
<ul> <li>et al. v. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501386;</li> <li><i>Franco v. Pacific Gas and Electric Company, et al.</i></li> <li>San Mateo Superior Court Case No. 501366;</li> <li>San Mateo Superior Court Case No. 501749;</li> <li>Balich v. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501751;</li> <li>Gibson v. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501977; Ferreira</li> <li>V. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501977; Ferreira</li> <li>V. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501997; Ferreira</li> <li>V. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501997; Ferreira</li> <li>V. Pacific Gas and Electric Company, et al.</li> <li>San Mateo Superior Court Case No. 501997; Ferreira</li> <li>V. Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 501997; Ferreira</li> <li>V. Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 50239; Pilanaidy</li> <li>V. Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 50239; Pilanaidy</li> <li>V. Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 50239; Pilanaidy</li> <li>V. Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 502332; Weish</li> <li>Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 502332; Weish</li> <li>Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 502332; Weish</li> <li>Pacific Gas and Electric Company, et al. San</li> <li>Mateo Superior Court Case No. 502332; Weish No.</li> <li>Pacific Gas and Electric Company, et al. San</li> <l< td=""><td></td><td></td><td></td></l<></ul>			
3       San Mateo Superior Court Case No. 501233;         4       al. San Mateo Superior Court Case No. 501386;         5       France or. Pracific Gas and Electric Company, et al.         6       San Mateo Superior Court Case No. 501749;         7       Salindar v. Pacific Gas and Electric Company, et al.         8       Baltch v. Pacific Gas and Electric Company, et al.         8       Salindar v. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 501751;         9       Salindar v. Pacific Gas and Electric Company, et al.         9       Wateo Superior Court Case No. 501996; Reid v. Pacific Gas and Electric Company, et al.         10       Nateo Superior Court Case No. 50230; Perceira         11       Wateo Superior Court Case No. 50231; Gerrar v. Pacific Gas and Electric Company, et al.         11       Pacific Gas and Electric Company, et al.         12       Pacific Gas and Electric Company, et al.         13       Mateo Superior Court Case No. 50231; Serri         14       Pacific Gas and Electric Company, et al.         15       Pacific Gas and Electric Company, et al.         16       Pacific Gas and Electric Company, et al.         17       Pacific Gas and Electric Company, et al.         18       Mateo Superior Court Case No. 502327; Weils N.	2		
4       Bologna v. Pacific Gas and Electric Company, et al.         5       Sam Mateo Superior Court Case No. 50136; France v. Pacific Gas and Electric Company, et al.         6       Saindate v. Pacific Gas and Electric Company, et al.         7       Saindate v. Pacific Gas and Electric Company, et al.         8       Saindate v. Pacific Gas and Electric Company, et al.         8       Saindate v. Pacific Gas and Electric Company, et al.         9       Vertice Gas and Electric Company, et al.         9       Vertific Gas and Electric Company, et al.         9       Vertific Gas and Electric Company, et al.         10       Pacific Gas and Electric Company, et al.         11       Mateo Superior Court Case No. 501957; Ferreira v. Pacific Gas and Electric Company, et al.         12       Pacific Gas and Electric Company, et al.         13       Mateo Superior Court Case No. 502096; Carrey v. Pacific Gas and Electric Company, et al.         14       Mateo Superior Court Case No. 50231; Serri v. Pacific Gas and Electric Company, et al.         15       Pacific Gas and Electric Company, et al.         16       Mateo Superior Court Case No. 502896; Alarcon v. Pacific Gas and Electric Company, et al.         16       Mateo Superior Court Case No. 502896; Alarcon v. Pacific Gas and Electric Company, et al.         17       Pacific Gas and Electric Company, et al.	3		
4       al. San Mateo Superior Court Case No. 501386;         5       France v. Pacific Gas and Electric Company, et al.         6       San Mateo Superior Court Case No. 501739;         7       Salinda v. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 501731;         9       Salinda v. Pacific Gas and Electric Company, et al.         9       V. Pacific Gas and Electric Company, et al.         9       V. Pacific Gas and Electric Company, et al.         10       Mateo Superior Court Case No. 501997; Ferreira         11       Mateo Superior Court Case No. 50239; Dipacidity         12       Pacific Gas and Electric Company, et al. San         13       Mateo Superior Court Case No. 50239; Dipacidity         14       Nateo Superior Court Case No. 50239; Dipacidity         15       Pacific Gas and Electric Company, et al. San         14       Mateo Superior Court Case No. 50239; Dipacidity         15       Pacific Gas and Electric Company, et al. San         16       Mateo Superior Court Case No. 50239; Dipacidity         17       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 50239; Dipacidity         19       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 50	3		
5       France v. Pacific Gas and Electric Company, et al.         6       Sam Mateo Superior Court Case No. 501750;         7       Salinda v. Pacific Gas and Electric Company, et al.         7       Gibson v. Pacific Gas and Electric Company, et al.         8       San Mateo Superior Court Case No. 501751;         9       Wateo Superior Court Case No. 501997; Ferreira         10       Nateo Superior Court Case No. 501997; Ferreira         11       Wateo Superior Court Case No. 501997; Ferreira         12       Wateo Superior Court Case No. 502096; Carney v.         13       Mateo Superior Court Case No. 502097; Ferreira         14       Mateo Superior Court Case No. 502529; Djunatidy         15       Pacific Gas and Electric Company, et al. San         16       Mateo Superior Court Case No. 502539; Disece v.         17       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 502532; Welsh v.         19       Pacific Gas and Electric Company, et al. San         16       Mateo Superior Court Case No. 502532; Welsh v.         17       Pacific Gas and Electric Company, et al. San         18       Mateo Superior Court Case No. 502896; Alarcon v         19       Pacific Gas and Electric Company, et al. San         16       Mateo Superior Court Case	4		
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	7	kmeredith@dankolaw.com	Case No. 499952; Low v. Pacific Gas and Electric
	8	tnishiki@dankolaw.com	Company, et al. San Mateo Superior Court Case No. 499954; Manuofetoa v. Pacific Gas and
	9		Electric Company, et al. San Mateo Superior Court Case No. 499955; Williams v. Pacific Gas and
	10		<i>Electric Company, et al.</i> San Mateo Superior Court Case No. 499956. <i>Liu v. Pacific Gas and Electric</i> <i>Company, et al.</i> San Mateo Superior Court Case
	11		No. 500565; Sadlak, et al. v. Pacific Gas and
	12		Electric Company, et al., San Mateo Superior Court Case No. 506512; Chea, et al. v. Pacific Gas and
	13		Electric Company, et al., San Mateo Superior Court Case No. 506513; Barr v. Pacific Gas and Electric
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SF/227	75576v1	TORT ACTIONS: DEFENDANTS PG&F AND PG&F	-9- CORP.'S MASTER ANSWER TO MASTER COMPLAINT
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-13-TORT ACTIONS: DEFENDANTS PG&E AND PG&E CORP.'S MASTER ANSWER TO MASTER COMPLAINT

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