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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.

FILED
Superior Court of California
County of Los Angeles
04/21/2025
David W. Stryker, Executive Officer / Clerk of Court
By: N. Navarro Deputy

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Attorneys for Defendants Southern California Edison Company and Edison International

Lead Case No.: 25STCV00731
and Related Cases

Assigned for all purposes to:
Judge: Hon. Laura A. Seigle
Dept: 17

CASE MANAGEMENT ORDER No. 2

Case Management Conference
Date: April, 17, 2025
Time: 10:00 a.m.
Dept: 17

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16 **Chambers Plaintiffs**

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Proposed Interim Class Counsel for Plaintiff
Roche

1 **I. GENERAL PROVISIONS**

2 Nothing in this order except for the lifting of the stay of liability discovery is intended or
3 does supersede the Case Management Order dated March 17, 2025 (“CMO 1”) in this matter,
4 unless otherwise noted.

5 **II. INDIVIDUAL PLAINTIFFS’ STEERING COMMITTEE**

6 CMO 1 included the list of firms that shall serve on the Individual Plaintiffs’ Steering
7 Committee. That list is amended as detailed in **Exhibit A**.

8 **III. SUBROGATION PLAINTIFFS’ COUNSEL**

9 Since the filing of CMO 1 additional insurance companies seeking subrogation for paid
10 damages (“Subrogation Plaintiffs”) have filed complaints. In addition to the Matrix provided to the
11 Court, the law firms representing Subrogation Plaintiffs, are listed in **Exhibit B**.

12 **IV. PUBLIC ENTITY PLAINTIFFS’ COUNSEL**

13 Since the filing of CMO 1, one additional Public Entity has filed a complaint. In addition
14 to the Matrix provided to the Court, the law firms and in-house government/entity attorneys
15 representing Public Entity Plaintiffs are listed in **Exhibit C**.

16 **V. INDIVIDUAL PLAINTIFFS’ ADDITIONAL COMPLAINTS**

17 **A. Notice of Adoption and Short Form Complaint**

18 Attached as **Exhibits D and E**, respectively, are the current drafts of the form of the Notice
19 of Adoption of the Individual Plaintiffs’ Master Complaint and the Individual Plaintiffs’ Short
20 Form Complaint. The Parties shall continue to meet and confer and shall submit to the Court the
21 finalized proposed forms within five (5) days of the Master Complaint being filed.

22 **B. Newly Added Individual Plaintiffs**

23 Each newly filed Individual Plaintiff Complaint or Short Form Complaint filing may
24 include multiple plaintiffs/households but will include no more than 45 plaintiffs so as to balance
25 the burden of filing fees associated with thousands of households expected to file with the need to
26 ensure the Court is adequately compensated for processing a large number of incoming pleadings.
27 Each Individual Plaintiff Complaint or Short Form Complaint that includes multiple plaintiffs will
28

1 be organized through the BrownGreer Eaton Fire portal such that the required information is pled
2 per household or household equivalent.

3 **C. Individual Plaintiffs' Data Reporting (Matrix)**

4 The Notice of Adoption of the Individual Plaintiffs' Master Complaint, as well as the
5 Individual Plaintiffs' Short Form Complaint shall be created within the BrownGreer portal created
6 for the Eaton Fire Litigation. Counsel for Individual Plaintiffs or Individual Plaintiffs acting *pro*
7 *per* should contact Liaison Counsel for Individual Plaintiffs for information on how to access and
8 register their clients on the BrownGreer portal. Information and documents stored by Individual
9 Plaintiffs in the BrownGreer portal shall remain confidential unless produced by Plaintiffs and shall
10 not be discoverable by Defendants or any other party.

11 Certain data entered into the BrownGreer portal shall be reported to the Court and counsel
12 for SCE on the last business day of each month. Attached hereto as **Exhibit F** is a sample of the
13 report that shall be generated detailing data that will be housed in the BrownGreer portal. Until
14 further order of the Court, the report shall include the following categories for each Individual
15 Plaintiff registered in the BrownGreer system:

- 16 • Plaintiff Name (Individual/Business/Entity)
- 17 • Adult/Minor (if individual)
- 18 • Counsel
- 19 • Household ID
- 20 • Original Case Name and Number
- 21 • Loss Location(s)
- 22 • Relationship to each Loss Location (Owner/Renter/Business
23 Owner/Employee/Other)
- 24 • Insured (Y/N) for losses at each Loss Location
- 25 • Extent of Damage (Mutually Exclusive)
 - 26 ○ Total Loss
 - 27 ○ Damaged, not Destroyed
 - 28 ○ Smoke and Ash

- Evacuation Only
- Other Damage – Description Only
- Wrongful Death
- Master Complaint Causes of Action Adopted
- Master Complaint Damages Adopted

VI. APPLICATIONS FOR APPOINTMENT OF GUARDIAN AD LITEM

The Court appoints Hon. Halim Dhanidina (ret.) of Signature Resolutions to serve as Special Master to review and approve applications for Guardian ad Litem (“GAL Application”). Individual Plaintiffs shall bear all costs associated with the Special Master on this issue.

As the Special Master, Justice Dhanidina is responsible for and is granted the authority to manage the receipt, review, and initial approval process of GAL Applications submitted by Individual Plaintiffs, including communication of deficiencies to and with Individual Plaintiffs’ counsel. The procedure for submission and approval of GAL Applications is set forth in **Exhibit G**, hereto.

Following entry of this Case Management Order, all Applications shall be submitted to Justice Dhanidina according to the procedure outlined in Exhibit G. Justice Dhanidina shall provide the Court with a written recommendation for those GAL Applications that he determines should be granted at least one time per month and as often as every two weeks, as necessary based on the number of GAL Applications received. A copy for the template of such reporting is attached hereto as **Exhibit H**.

Justice Dhanidina shall be compensated in the amount of \$200 per GAL Application reviewed and recommended for the Court’s execution, and such fee shall be paid by the Individual Plaintiff, through their counsel, requesting the appointment of the guardian ad litem.

VII. DISCOVERY

A. Partial Lifting of the Stay of Discovery

As discussed in Section VII(C), below, the stay on liability discovery *only* is lifted upon the signing of this order. Limited damages discovery may proceed as outlined in Section VII(D)(1), below. Otherwise, damages discovery is and will be stayed until otherwise ordered by this Court.

1 **B. General Discovery Provisions**

2 The provisions of CMO 1 that pertain to Discovery Dispute Resolution, Depositions and
3 Document Depository, PMQ Depositions, General Liability Discovery, Damages Discovery, and
4 Third-Party Discovery continue to apply to the Eaton Fire Litigation. This Case Management
5 Order No. 2 (CMO 2) is intended to address only the timing and staging of such discovery.

6 **C. Liability Discovery**

7 Liability discovery requests including but not limited to interrogatories, requests for
8 production, third-party subpoenas, depositions, and requests for inspection, are permitted upon the
9 signing of this order. The provisions of CMO 1 outlining discovery procedures, including the
10 requirement that any such discovery be coordinated among and by Plaintiffs' Liaison Counsel
11 remain in effect. For the absence of doubt, no Plaintiff may serve any liability discovery that will
12 not be propounded as a Master Set or third-party subpoena issued by Plaintiffs' Liaison Counsel,
13 without first seeking leave of court by noticed motion. In addition, for the absence of doubt, each
14 Plaintiff group, including Subrogation Plaintiffs, Individual Plaintiffs, and Public Entity Plaintiffs
15 shall be able to serve their own sets of discovery on the Defendants, while making efforts to avoid
16 duplication in discovery served.

17 **D. Damages Discovery**

18 As has been the practice in other previous wildfire matters, discovery as to Plaintiffs'
19 damage claims shall take place in two stages as described below.

20 **1. Stage 1 Damages Discovery**

21 Defendants may obtain limited damages discovery from each Plaintiff group.

22 Individual Plaintiff Fact Sheets and Damages Questionnaires shall be verified. The
23 Subrogation List of Claims shall not be verified and shall be produced to Defendant under the
24 mediation privilege. Subrogation Claim Files shall not be verified upon initial production. In the
25 event that Defendant needs any specific Claim File, or part thereof, verified, Defendant shall meet
26 and confer with Subrogation Plaintiffs. Subject to the applicable provisions in CMO 1, Public
27 Entity Plaintiffs and Defendants shall meet and confer regarding damages discovery, including
28 whether such damages discovery will be verified.

1 a. Individual Plaintiff Fact Sheets

2 Individual Plaintiffs and Defendants agreed upon the form of the Individual Plaintiff Fact
3 Sheets, which will be completed by each Individual Plaintiff – either individually or together with
4 other members of the same household. A copy of the Individual Plaintiff Fact Sheet is attached
5 hereto as **Exhibit I**. The Individual Plaintiff Fact Sheet shall be created within the BrownGreer
6 portal created for the Eaton Fire Litigation. Any Individual Plaintiff may amend or supplement
7 their responses to the Individual Plaintiff Fact Sheet without leave of this Court until the close of
8 fact discovery applicable to their individual action. Individual Plaintiffs and Defendants will meet
9 and confer regarding the service of the Individual Plaintiff Fact Sheet.

10 For any Individual Plaintiff already related to the Eaton Fire Litigation, complete and
11 verified Individual Plaintiff Fact Sheets shall be served upon Defendants within 60 days of entry of
12 this Case Management Order.

13 Any Individual Plaintiff/Household whose complaint is deemed related after the date of this
14 Order shall complete a verified Individual Plaintiff Fact Sheet within 60 days of the date that their
15 action is deemed related to the Eaton Fire Litigation

16 b. Individual Plaintiff Damages Questionnaire

17 Individual Plaintiffs and Defendants will continue to meet and confer upon the form of the
18 Individual Plaintiff Damages Questionnaire, which will be completed by each Individual Plaintiff
19 – either individually or together with other members of the same household. The Individual
20 Plaintiff Damages Questionnaire shall be created within the BrownGreer portal created for the
21 Eaton Fire Litigation. Any Individual Plaintiff may amend or supplement their responses to the
22 Damages Questionnaire without leave of this Court until the close of fact discovery applicable to
23 their individual action. The Court will address the timing of service of the Individual Plaintiff
24 Damages Questionnaire at the May 6, 2025, Case Management Conference.

25 c. Subrogation Damages Discovery

26 The provisions of CMO 1 pertaining to Compilation of Claims Damages Data and No
27 Waiver Regarding Discovery of Claims Damages Data continue to apply.
28

(1) Claim File Matching

The Parties anticipate there will be a number of named Individual Plaintiffs who have also filed insurance claims, and that such claims are or will be in the List of Claims provided to Defendants pursuant to CMO 1. The Parties have met and conferred and recognize that those Individual Plaintiffs have certain rights pertaining to the production of their insurance claim files, and thus matching the Initial List of Individual Plaintiffs to the List of Claims in order to provide their claim file is necessary before claim file production can begin. This process is known as “Claim File Matching.” The Parties have a long history of agreement on this time intensive process, and based on the number of named and anticipated Individual Plaintiffs and number of anticipated insurance claims, the Parties recognize Claim File Matching cannot begin until (1) Individual Plaintiffs have onboarded into the BrownGreer Portal, creating an Initial “IP List”¹, (2) the first List of Claims² is compiled by Subrogation Plaintiffs, and (3) the Initial IP List is provided to Subrogation Plaintiffs by Individual Plaintiffs and matched by the Subrogation Plaintiffs, to the extent possible, to the List of Claims.

Under the terms of CMO 1 the List of Claims will be provided on or before July 15, 2025. The Parties then anticipate the initial Claim File Matching process based off the Initial IP List will take significant time to complete (“Initial Matching Completion”). The Parties will further meet and confer regarding the Claim File Matching completion date after the List of Claims is created and provided to the Defendants under mediation privilege, and after the Initial IP List is provided to Subrogation Plaintiffs. The Parties will then advise the Court of the anticipated date of the Initial Matching Completion.

Individual Plaintiffs will provide Subrogation Plaintiffs with an updated IP List on the last business day of each month.

¹ The IP List shall include names of Individual Plaintiffs organized into households, loss location address, insurance carrier, claim number and insurance policy number.

² The List of Claims is maintained by Subrogation Plaintiffs and shared only with the Defendants, the List of Claims shall not be provided to the Individual Plaintiffs or Brown Greer.

1 (2) Claim File Production

2 Upon the Initial Matching Completion, the Subrogation Plaintiffs will begin to produce
3 matched closed claim files to Defendants within 45 days on a rolling basis, and pursuant to the
4 Protective Order. The Parties stipulate, and the Court Orders, that any claims related to Individual
5 Plaintiffs who are listed on the IP List will receive a copy of their claim file prior to production to
6 the Defendants, and Individual Plaintiffs shall have 15 days from receipt of the file to review
7 before the file is released to Defendants. These matched claim files will be provided to counsel for
8 the Individual Plaintiffs through BrownGreer. Individual Plaintiffs shall bear the cost(s) for the
9 production of claim files through BrownGreer. Individual Plaintiffs waive any objection to the
10 release of their claim file to Defendants if it is not raised prior to the 15-day hold.

11 Defendants may request the production of particular closed or open matched claims files
12 earlier in time in specific instances, and the Defendants and Subrogation Plaintiffs will meet and
13 confer on any such request. Subrogation Plaintiffs are free to produce any unmatched claim files
14 beginning March 31, 2026. If Defendants request any unmatched claim file prior to March 31,
15 2026, Subrogation Plaintiffs will advise Individual Plaintiffs' Liaison Counsel of the request,
16 and are free to produce the claim file(s) to Defendants if Subrogation Plaintiffs do not receive
17 information related to a potential matched insured for the claim file(s) within 15 days. The
18 Parties agree that absent a request for a specific claim file, claim files which are not matched to an
19 Individual Plaintiff shall not be produced.

20 d. Public Entity Plaintiff Damages Discovery

21 The provisions of CMO 1 regarding Public Entity Plaintiff Damages Discovery continue to
22 apply.

23 2. Stage 2 Damages Discovery

24 Defendants may propound any additional damages discovery allowed under the California
25 Code of Civil Procedure, including depositions of Individual Plaintiffs, Subrogation Plaintiffs, and
26 Public Entity Plaintiffs related to damages, only after that specific Plaintiff's case is set for trial.
27
28

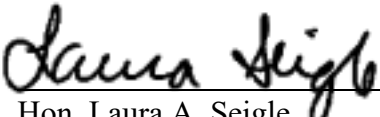
1 **VIII. PAYMENT OF JURY FEES**

2 Each Plaintiff group shall pay a single jury fee within ten (10) days from the date of entry of
3 CMO 2, which will cover jury fees for each Plaintiff within each group that are now or will be later
4 related to the consolidated action.

5
6 **IT IS SO ORDERED.**

7
8 Dated: 04/21/2025



2025


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

EXHIBIT A

Individual Plaintiffs' Steering Committee

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Andrade Gonzalez LLP
Andrews & Thornton, AAL, ALC
Arias Sanguinetti Trial Lawyers
Becker Law
Brent & Fiol, LLP
Bridgford, Gleason & Artinian
Casey Gerry Schenk
Corey, Luzaich, de Ghetaldi & Riddle LLP
Cotchett, Pitre & McCarthy LLP
Douglas/Hicks Law APC - Harris & Hayden
Downtown LA Law Group
Edelson P.C.
Ellis Riccobono, LLP
Engstrom Lipscomb & Lack
Feist Griffith LLP
Foley Bezek Behle & Curtis, LLP
Fox Law, APC
Frantz Law Group, APLC
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McNulty Law Firm
Milberg
Moon Law APC
Morgan & Morgan, PA.
Nachawati Law Group
Panish, Shea, Ravipudi LLP
Parkinson, Benson, Potter
Quinn Emanuel Urquhart & Sullivan, LLP
Robertson & Associates, LLP
Robins Cloud, LLP
Rosen Saba, LLP
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Schimmel & Parks, APLC
Sieglock Law
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The Bernheim Group
The Miller Law Firm
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Attorneys for Individual Plaintiffs

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JEREMY GURSEY, Individually,
Plaintiff,

vs.

SOUTHERN CALIFORNIA EDISON
COMPANY, a California Corporation; and
EDISON INTERNATIONAL, a California
Corporation, DOES 1 through 100, inclusive,
Defendants.

AND ALL RELATED CASES TO EATON
FIRE LITIGATION

Case Number:

LEAD CASE NO 25STCV00731

Assigned for all purposes to:
Judge: Hon. Laura A. Seigle
Dept.: 17

**NOTICE OF ADOPTION OF MASTER
COMPLAINT**

(INDIVIDUAL PLAINTIFFS)

Pursuant to the Court's Case Management Order No. 1, Plaintiff(s) hereby submit(s) this Notice of Adoption of the Master Complaint against Defendants identified above and hereby adopt(s) and incorporate(s) by reference as set forth in Individual Plaintiffs' most recent Master Complaint filed in this matter on May __, 2025, and any and all later amendments thereto.

1 **PARTIES**

2 **I. PLAINTIFF(S) (to be repeated for each plaintiff in the household)**

3 A. Individual Plaintiff [FIRST MIDDLE LAST DOB], individually was damaged
4 by the Fire as set forth below and makes the claims set forth below.

5 B. Business Plaintiff [ENTITY NAME] was damaged by the Fire as set forth below
6 and makes the claims set forth below.

7 C. Non-Business Plaintiff [ENTITY i.e. Trust holding property], individually was
8 Damaged by the Fire as set forth below and makes the claims set forth below.

9 **II. DEFENDANTS**

10 A. Defendants from the Master Complaint

11 ☐ Southern California Edison Company

12 ☐ Edison International

13 ☐ Does 1 – 100
14

15 **FACTUAL ALLEGATIONS**

16 **I. NOTICE OF ADOPTION/AMENDMENT OF MASTER COMPLAINT**

17 Plaintiff(s) refer(s) to and incorporate(s) herein by reference that Master Complaint filed
18 on behalf of Individual Plaintiffs in the Eaton Fire Litigation, Lead Case *Gursey v. Southern*
19 *California Edison*, Case No. 25STCV00731, as though fully set forth herein. Plaintiff(s) hereby
20 adopt(s) the Master Complaint and agree(s) to be bound by any rulings with respect to the
21 pleadings.

22 **II. PLAINTIFF'S/PLAINTIFFS' LOSSES (to be repeated for each loss location related**
23 **to the household).**

24 Plaintiff(s) allege(s) the following property/properties have been impacted by the Southern
25 California Fires for which Plaintiff(s) seek(s) recovery:
26
27
28

1 **A. Loss Location 1**

2 1. Plaintiffs allege the following property has been impacted by the
3 Fire for which Plaintiffs seek recovery: [ADDRESS]

4 3. Relationship to Property:

- 5 ☐ Owner of real property
6 ☐ Renter of real property
7 ☐ Business owner
8 ☐ Employee
9 ☐ Other

10 4. Insured or Uninsured:

- 11 ☐ Insured
12 ☐ Uninsured

13 5. Extent of Damage:

- 14 ☐ Total Loss
15 ☐ Damaged, not Destroyed
16 ☐ Smoke & Ash
17 ☐ Evacuation Only

18 6. Wrongful Death

- 19 ☐ Yes
20 ☐ No

21 **CAUSES OF ACTION (TO BE REVISED ONCE MASTER COMPLAINT IS FILED)**

22 Plaintiff(s) incorporate(s) by reference each of the causes of action in the Master
23 Complaint checked below against all those Defendants indicated above:

- 24 ☐ First Cause of Action – _____
25 ☐ Second Cause of Action – _____
26 ☐ Third Cause of Action – _____
27 ☐ Fourth Cause of Action – _____
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- ☐ Fifth Cause of Action – _____
- ☐ Sixth Cause of Action – _____
- ☐ Seventh Cause of Action – _____
- ☐ Eighth Cause of Action – _____

DAMAGES ALLEGED

DAMAGES FROM THE MASTER COMPLAINT (TO BE REVISED ONCE MASTER COMPLAINT IS FILED)

- Damages for** _____
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- Damages for** _____
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- Damages for** _____
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II. ADDITIONAL DAMAGES

Plaintiff(s) further alleges losses relating to [INSERT ADDITIONAL DAMAGES HERE]/

DEMAND FOR JURY TRIAL

Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.

Plaintiff(s) respectfully reserve(s) the right to seek transfer or remand of the trial of this action to the County of Los Angeles or another appropriate venue.

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DATED: _____, 2025

[COUNSEL]

By : _____
Counsel for Plaintiffs

DRAFT

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Eaton Fire Cases

ELECTRONIC PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. I am employed by [Insert Law Firm Name], whose business address is: [Insert Business Address].

On _____, 2025, I served a true copy of the foregoing document described as: **NOTICE OF ADOPTION OF MASTER COMPLAINT**

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

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

Executed on _____, 2025 at [City], [State].

[Name]

EXHIBIT E

[Attorney Name] (SBN _____)
[attorney email]
[LAW FIRM NAME]
[Address]
[City, State, Zip]
Phone: (____) ____-____ • Fax: (____) ____-____

Attorneys for Individual Plaintiffs

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JEREMY GURSEY, Individually,
Plaintiff,

vs.

SOUTHERN CALIFORNIA EDISON
COMPANY, a California Corporation; and
EDISON INTERNATIONAL, a California
Corporation, DOES 1 through 100, inclusive,
Defendants.

Case Number:

LEAD CASE NO 25STCV00731

Assigned for all purposes to:
Judge: Hon. Laura A. Seigle
Dept.: 17

SHORT FORM COMPLAINT
(INDIVIDUAL PLAINTIFFS)

AND ALL RELATED CASES TO EATON
FIRE LITIGATION

Pursuant to the Court's Case Management Order No. 1, Plaintiff(s) hereby submit(s) this Short Form Complaint against Defendants identified above and hereby adopt(s) and incorporate(s) by reference as set forth in Individual Plaintiffs' most recent Master Complaint filed in this matter on May __, 2025, and any and all later amendments thereto.

1 **PARTIES**

2 **I. PLAINTIFF(S) (to be repeated for each plaintiff in the household)**

3 A. Individual Plaintiff [FIRST MIDDLE LAST DOB], individually was damaged
4 by the Fire as set forth below and makes the claims set forth below.

5 B. Business Plaintiff [ENTITY NAME] was damaged by the Fire as set forth below
6 and makes the claims set forth below.

7 C. Non-Business Plaintiff [ENTITY i.e. Trust holding property], individually was
8 Damaged by the Fire as set forth below and makes the claims set forth below.

9 **II. DEFENDANTS**

10 A. Defendants from the Master Complaint

11 ☐ Southern California Edison Company

12 ☐ Edison International

13 ☐ Does 1 – 100

14 **FACTUAL ALLEGATIONS**

15 **I. SHORT FORM COMPLAINT**

16 Plaintiff(s) refer(s) to and incorporate(s) herein by reference that Master Complaint filed
17 on behalf of Individual Plaintiffs in the Eaton Fire Litigation, Lead Case *Gursey v. Southern*
18 *California Edison*, Case No. 25STCV00731, as though fully set forth herein. Plaintiff(s) hereby
19 adopt(s) the Master Complaint and agree(s) to be bound by any rulings with respect to the
20 pleadings.
21

22 **II. PLAINTIFF’S/PLAINTIFFS’ LOSSES (to be repeated for each loss location related**
23 **to the household).**

24 Plaintiff(s) allege(s) the following property/properties have been impacted by the Southern
25 California Fires for which Plaintiff(s) seek(s) recovery:
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1 **A. Loss Location 1**

2 1. Plaintiffs allege the following property has been impacted by the
3 Fire for which Plaintiffs seek recovery: [ADDRESS]

4 3. Relationship to Property:

- 5 ☐ Owner of real property
6 ☐ Renter of real property
7 ☐ Business owner
8 ☐ Employee
9 ☐ Other

10 4. Insured or Uninsured:

- 11 ☐ Insured
12 ☐ Uninsured

13 5. Extent of Damage:

- 14 ☐ Total Loss
15 ☐ Damaged, not Destroyed
16 ☐ Smoke & Ash
17 ☐ Evacuation Only

18 6. Wrongful Death

- 19 ☐ Yes
20 ☐ No

21 **CAUSES OF ACTION (TO BE REVISED ONCE MASTER COMPLAINT IS FILED)**

22 Plaintiff(s) incorporate(s) by reference each of the causes of action in the Master
23 Complaint checked below against all those Defendants indicated above:

- 24 ☐ First Cause of Action – _____
25 ☐ Second Cause of Action – _____
26 ☐ Third Cause of Action – _____
27 ☐ Fourth Cause of Action – _____
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- ☐ Fifth Cause of Action – _____
- ☐ Sixth Cause of Action – _____
- ☐ Seventh Cause of Action – _____
- ☐ Eighth Cause of Action – _____

DAMAGES ALLEGED

DAMAGES FROM THE MASTER COMPLAINT (TO BE REVISED ONCE MASTER COMPLAINT IS FILED)

- Damages for** _____
☐
- Damages for** _____
☐
- Damages for** _____
☐

II. ADDITIONAL DAMAGES

Plaintiff(s) further alleges losses relating to [INSERT ADDITIONAL DAMAGES HERE]/

DEMAND FOR JURY TRIAL

Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.
Plaintiff(s) respectfully reserve(s) the right to seek transfer or remand of the trial of this action to the County of Los Angeles or another appropriate venue.

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DATED: _____, 2025

[COUNSEL]

By : _____
Counsel for Plaintiffs

DRAFT

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Eaton Fire Cases

ELECTRONIC PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. I am employed by [Insert Law Firm Name], whose business address is: [Insert Business Address].

On _____, 2025, I served a true copy of the foregoing document described as: **SHORT FORM COMPLAINT**

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

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

Executed on _____, 2025 at [City], [State].

[Name]

EXHIBIT F

Eaton								
	Plaintiff Name	Plaintiff Type	Law Firm	Household ID	Case Number	Case Name	Individual Plaintiff Type (Adult/Minor)	Wrongful Death Claim Asserted
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Eaton							
	Plaintiff Name	Plaintiff Type	Law Firm	Household ID	Case Number	Case Name	Individual Plaintiff Type (Adult/Minor)
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EXHIBIT G

PROCEDURE FOR SUBMISSION AND APPROVAL OF APPLICATIONS FOR APPOINTMENT OF GUARDIAN AD LITEM

Special Master: Hon. Halim Dhanidina

Contact email: hdhanidina@signatureresolution.com

Case Manager: Erin Zicari

Contact email: ezicari@signatureresoluton.com

Contact phone: (213) 433-5771

SUBMISSION OF APPLICATIONS: Individual Plaintiffs shall file with the Court any Application for Appointment of Guardian ad Litem (“GAL Application”), along with a corresponding Proposed Order. Individual Plaintiffs may use the minor’s initials and birth year rather than the minor’s full name and date of birth. If there are multiple minors within the same family with the same initials and birth year, the filing party must differentiate between them by e.g. using the middle initial or adding an additional letter. Upon receipt of the ***file stamped copies showing the date of filing***, the Individual Plaintiff shall then email the file stamped copies of the GAL Application and corresponding Proposed Order by email to: hdhanidina@signatureresolution.com and ezicari@signatureresoluton.com. Each individual GAL Application shall be sent in a *separate email* with the subject line “GAL APPLICATION – [Minor’s Last Name, Minor’s First Name].”

EDITS/CHANGES: To the extent that the Special Master determines that edits or changes are necessary on the GAL Application, his requests will be made via email in response to the original submission email. The Individual Plaintiff must correct any deficiencies and file a new GAL Application and Proposed Order with the Court. Upon receipt of the ***file stamped copies showing the date of filing***, the filing party shall submit the corrected GAL Application and Proposed Order to the Special Master in response to the same email thread and should always include in the subject line “GAL APPLICATION – [Minor’s Last Name, Minor’s First Name]” for tracking purposes.

RECOMMENDATION FOR GRANTING OF APPLICATIONS: At least one time per month, and every two weeks as needed to manage the volume of GAL Applications received, the Special Master shall provide the Court, **by email to SSCDept17@lacourt.org**, with a written recommendation as to whether certain Applications be granted or denied and that the corresponding order(s) be signed by Judge Seigle. Attached to CMO 2 as Exhibit H is the format the Court has approved for submission of that recommendation. The Special Master’s recommendations shall reference the GAL Applications in filing date order to assist the Court with locating the filed GAL Application and Proposed Order on the docket. The Special Master shall not provide to the Court the GAL Application and Proposed Order as those were previously filed with the Court. The Special Master’s recommendations will be served to all Parties via Case Anywhere by Liaison Counsel.

SERVICE OF GRANTED APPLICATIONS: Upon execution of each Order of Appointment of Guardian ad Litem by Judge Seigle, the Court will return the entered Order to the original filing party. The filing party shall post the signed order(s) on Case Anywhere.

FEE FOR APPLICATIONS: The fee for each individual GAL Application is \$200. The Special Master's staff will bill Individual Plaintiffs' counsel for all of that counsel's (or firm's) submissions on a monthly basis. Payment is due to the Special Master upon receipt of the billing invoice.

EXHIBIT H

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

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

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

Liaison Counsel for Individual Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – SPRING STREET

EATON FIRE LITIGATION

JEREMY GURSEY, individually,

Plaintiffs,

vs.

SOUTHERN CALIFORNIA EDISON
COMPANY, a California corporation, and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No.: 25STCV00731
Honorable Laura A. Seigle (Dept. 17)

**SPECIAL MASTER’S RECOMMENDATION
RE: APPLICATIONS FOR APPOINTMENT
OF GUARDIANS AD LITEM (NO. 1)**

TO THE COURT, ALL INTERESTED PARTIES AND THEIR ATTORNEYS:

In accordance with Case Management Order No. 2, I have reviewed the Applications for Appointment of Guardians ad Litem set forth in Exhibit A and find that each of the Applications is prepared in compliance with *Code of Civil Procedure* section 372 et seq.

I recommend that the Court grant each of the Applications, and execute their respective orders, listed in Exhibit A below.

EXHIBIT A

FILING DATE	MINOR	GAL	CASE NO.	LAW FIRM

I have also reviewed the Applications for Appointment of Guardians ad Litem set forth in Exhibit B and find that each of the Applications or corresponding Proposed Order contained deficiencies. I directed the Applicant to correct the deficiencies, they did so, and they filed a corrected GAL Application and Proposed Order. I have recommended that the Court grant any such corrected Applications, and execute their respective orders. Exhibit B, below, lists any corresponding deficient filings that the Court should remove from the docket.

EXHIBIT B

FILING DATE	MINOR	GAL	CASE NO.	LAW FIRM

Dated: _____

Hon. Halim Dhanidina
Special Master

EXHIBIT I

EATON FIRE LITIGATION
LEAD CASE NO. 25STCV00731
PLAINTIFF FACT SHEET

The Plaintiff Fact Sheet shall be completed in accordance with the requirements and guidelines set forth in the applicable Case Management Order.

The Plaintiff Fact Sheet may be completed by an individual plaintiff or by multiple individual plaintiffs within a household, provided that every individual plaintiff required to complete the Plaintiff Fact Sheet does so. 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.

The Plaintiff Fact Sheet allows plaintiffs to allege damages related to multiple Loss Locations.

If an individual plaintiff alleges damages related to lost business income, commercial property, and/or business equipment, include the related property address in the Affected Properties section, select “Business Owner” as the relationship to the property and answer the applicable questions in that section.

A. Case 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 Plaintiff Fact Sheet, 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 Plaintiff Fact Sheet 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 Plaintiff Fact Sheet 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
 - d. Insured (Y/N)
 - Carrier
 - Policy Number
 - Claim Number

5. For each Trust Plaintiff on this Plaintiff Fact Sheet asserting a claim:
 - a. Trust Plaintiff name
 - b. Trustee name(s) (First, Middle, Last)
6. For each Estate Plaintiff on this Plaintiff Fact Sheet asserting a claim:
 - a. Estate name
 - b. Personal Representative name(s) (First, Middle, Last)
7. Has any plaintiff on this Plaintiff Fact Sheet been a debtor in a bankruptcy proceeding that (a) commenced on or after the date of the Eaton Fire or (b) commenced before but remained open on the date of the Eaton Fire? If so, provide the bankruptcy case number.

B. Affected Properties

1. **List all properties** that were affected by the fire identified in this Fact Sheet. For each property:
 - a. Address (Street, City, State, Zip)
 - b. APN
 - c. Insured (Y/N)
 - If yes,
 - Carrier
 - Policy Number
 - Claim Number
 - d. For each individual plaintiff(s) on this Plaintiff Fact Sheet who has any claim associated with this Loss Location
 - Name
 - Relationship to Property
 - Owned
 - Rented
 - Occupied
 - Other: _____
2. **For each Affected Property:**
 - a. Was there a dwelling at this Loss Location that was destroyed, damaged, or sustained smoke and/or soot damage only?
 - If yes, select destroyed, damaged, or smoke and/or soot damage only.
 - b. Was there a commercial structure at this Loss Location that was destroyed, damaged, or sustained smoke and/or soot damage only?
 - If yes, select destroyed, damaged, or smoke and/or soot damage only.
 - c. Were there other structures at this Loss Location that were destroyed, damaged, or sustained smoke and/or soot damage only?

- If yes, select destroyed, damaged, or smoke and/or soot damage only.
- d. [Owners Only] Did the real property at this Loss Location sustain a diminution in value? (N/A for Renters)
- e. Was there personal property at this Loss Location owned by any plaintiff on this Plaintiff Fact Sheet that was destroyed, damaged, or sustained smoke and/or soot damage only?
 - If yes, select destroyed, damaged, or smoke and/or soot damage only.
- f. If the property housed a business, was there business equipment at this Loss Location that was destroyed, damaged, or sustained smoke and/or soot damage only?
 - If yes, select destroyed, damaged, or smoke and/or soot damage only.
- g. [Owners Only] Did you experience loss of use of real property (economic damages) that was damaged or destroyed at this Loss Location?
- h. Did you experience the loss of use of personal property or business equipment that was damaged or destroyed at this Loss Location?

3. **For each Individual Plaintiff:**

- a. Did the Individual Plaintiff evacuate or shelter in place as a result of the Eaton Fire?
 - Evacuate or shelter-in-place?
 - Select the applicable Loss Location(s) from which the Individual Plaintiff evacuated.
 - Did the Individual Plaintiff suffer emotional distress as a result of evacuating or sheltering in place?
- b. Did the Individual Plaintiff suffer the loss of use and enjoyment of real property (non-economic damages)?
 - Select the applicable Loss Location(s).
- c. Did the Individual Plaintiff suffer a physical bodily injury as a result of the Fire?
 - If yes, for each physical bodily injury:
 - What was the general nature of the injury?
 - Burn
 - Smoke inhalation
 - Other: _____
 - Was the Individual Plaintiff hospitalized as a result of this physical bodily injury?
- d. Did the Individual Plaintiff suffer loss of personal income as a result of damage to or destruction to a Loss Location, or as a result of physical bodily injury caused by the Eaton Fire?
 - Personal income loss caused by Loss Location damage or destruction and/or physical bodily injury.
 - Select the applicable Loss Location(s).

4. **For each Business Entity Plaintiff:**
- a. Did the Business Entity Plaintiff suffer loss of business profits as a result of damage to or destruction to a Loss Location?
 - Select the applicable Loss Location(s).
5. **For each Vehicle damaged or destroyed by the Fire:**
- a. Title Owner(s) (Check all that apply)
 - b. Vehicle Information:
 - Make
 - Model
 - Year
 - VIN (Vehicle Identification Number)
 - c. Was the vehicle destroyed, damaged, or smoke and/or soot damage only?
 - If yes, select destroyed, damaged, or smoke and/or soot damage only.
 - d. Insured (Y/N)
 - Carrier
 - Policy Number
 - Claim Number

C. Wrongful Death

1. Is any plaintiff on this Plaintiff Fact Sheet asserting a claim for wrongful death or a survival claim as a result of the Eaton Fire?
 - a. If yes, (per decedent)
 - Please state the name of the deceased.
 - Date of death.
 - Place of death.
 - List all known heirs of the deceased.
 - Plaintiffs on this Plaintiff Sheet making a wrongful death claim or a survival claim related to this deceased:
 - Plaintiff name.
 - Plaintiff relationship to deceased.