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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

EVANGELINE IGLESIAS,)	
)	
PLAINTIFF,)	
)	
VS.)	
)	NO. 25NNCV00200
SOUTHERN CALIFORNIA EDISON)	
COMPANY, ET AL.,)	
)	
DEFENDANT.)	
)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS
VIRTUAL TOWN HALL MEETING
THURSDAY, FEBRUARY 26, 2026

APPEARANCES:

FOR PLAINTIFFS:	EDELSON PC
	BY: DEVIN R. CONLEY, ESQ.
	AMY HAUSMANN, ESQ.
	JULIA SMITH, ESQ.

1 CASE NUMBER: 25NNCV00200
2 CASE NAME: IGLESIAS V. SCE, ET AL.
3 LOS ANGELES, CALIFORNIA THURSDAY, FEBRUARY 26, 2026
4 REPORTER: CALLIE BLACK, CSR 13971
5 APPEARANCES: (AS HERETOFORE MENTIONED.)
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9 MS. CONLEY: WELCOME, EVERYONE. APPRECIATE YOU
10 JOINING US THIS EVENING. I'M IN THE PASADENA OFFICE.
11 I'M DEVIN CONLEY, MASTER TORT COUNSEL. I'M HERE HELPING
12 YOU ALL OUT. FEEL FREE TO STOP BY TOMORROW OR MONDAY IF
13 YOU WANT TO SAY HELLO.

14 WITH THAT, I JUST WANT TO REMIND EVERYONE, THIS
15 IS A PRIVATE CONFIDENTIAL EVENT. WE'LL RECORD IT AND
16 WE'LL PROVIDE A TRANSCRIPT, BUT PLEASE DON'T SHARE ANY
17 INFORMATION THAT WE DISCUSS TOGETHER WITH ANYONE OUTSIDE
18 EDELSON'S REPRESENTATION.

19 WITH THAT, I'LL START THE RECORDING, AND THEN
20 I'LL LEAVE IT. I'LL TURN IT OVER TO AMY HAUSMANN TO
21 DISCUSS WHAT'S GOING ON IN THE LITIGATION FRONT. AMY,
22 WHAT CAN YOU TELL US?

23 MS. HAUSMANN: GREAT, THANK YOU DEVIN. SO IT'S
24 GOOD TO SEE EVERYBODY. THANKS FOR COMING THIS EVENING.
25 AGAIN, MY NAME IS AMY. I'M ONE OF THE PARTNERS WORKING
26 ON THE CASE, AND I'M GOING TO PROVIDE A BRIEF UPDATE ON
27 WHERE THINGS STAND IN THE LITIGATION, BOTH WHAT WE'RE
28 DOING OFFENSIVELY AND ALSO JUST A VERY BRIEF REMINDER

1 THAT ALL OF THE STUFF THAT IS GOING ON FOR CLIENTS --
2 BECAUSE I KNOW, AT LEAST FOR MANY OF YOU, WE'VE BEEN IN
3 YOUR INBOXES A LOT, AND THEN I'LL RESPOND TO SOME OF THE
4 QUESTIONS THAT FOLKS SUBMITTED IN ADVANCE.

5 SO TO START WITH JUST AN UPDATE ON WHERE THE
6 LITIGATION IS, WE HAD A CASE MANAGEMENT CONFERENCE WITH
7 THE COURT JUST YESTERDAY. IT WAS A BUSY HEARING WITH
8 LOTS GOING ON. I THINK THAT ONE OF THE MAIN UPDATES OF
9 LATE IS THAT, AS YOU MAY HAVE SEEN OR WE MAY HAVE
10 DISCUSSED IN PREVIOUS TOWN HALLS, IS THAT SCE FILED
11 COMPLAINTS AGAINST A NUMBER OF OTHER ENTITIES, WHICH ARE
12 CALLED CROSS-DEFENDANTS, WHEN ONE DEFENDANT FILES A
13 CLAIM AGAINST SOMEBODY ELSE TRYING TO SHIFT THE BLAME.
14 SO THEY FILED THOSE KINDS OF COMPLAINTS AGAINST SOUTHERN
15 CALIFORNIA GAS, A SOFTWARE COMPANY CALLED GENASYS, AND A
16 SLEW OF PUBLIC ENTITIES, THE CITY OF PASADENA, CITY OF
17 SIERRA MADRE, LA COUNTY, FIRE DEPARTMENTS, THINGS LIKE
18 THAT.

19 BASICALLY, SCE IS CLAIMING THAT THESE OTHER
20 ENTITIES SHARE SOME OF THE BLAME FOR THE DAMAGE CAUSED
21 BY THE FIRE. THEY HAVE VARIOUS THEORIES ABOUT WHY THAT
22 WOULD BE THE CASE. I THINK THAT WE, THE PLAINTIFFS,
23 ACTUALLY PROBABLY HAVE THE SAME VIEW AS THESE NEW
24 CROSS-DEFENDANTS DO, WHICH IS THAT SCE'S CLAIMS DON'T
25 REALLY HAVE A LOT OF MERIT. WE THINK SCE IS THE ONE
26 THAT STARTED THE FIRE AND IS RESPONSIBLE FOR THE DAMAGE.

27 THESE NEW CROSS-DEFENDANTS MADE CLEAR THAT THEY
28 INTEND TO MOVE TO DISMISS THE COMPLAINTS AGAINST THEM,

1 AND THEY HAVE A NUMBER OF, WE THINK, PRETTY STRONG
2 ARGUMENTS AND DEFENSES AGAINST THOSE CLAIMS. A LOT OF
3 THE PUBLIC ENTITIES ARE IMMUNE FROM THIS KIND OF SUIT.
4 AND AGAIN I THINK THEY ALL SHARE THE VIEW WE DO, WHICH
5 IS THAT SCE IS THE ONE WHO REALLY CARRIES THE BLAME AND
6 CARRIES THE LIABILITY FOR THIS FIRE AND ALL OF THE
7 DAMAGE CAUSED. SO THEY ARE GOING TO FILE MOTIONS TO
8 DISMISS OVER THE NEXT MONTH OR SO. THEY WILL BE
9 BRIEFED, AND THE COURT WILL RULE ON THEM, HOPEFULLY,
10 THIS SPRING.

11 THE OTHER POSITIVE, I THINK, UPDATE FROM
12 YESTERDAY'S COURT HEARING IS THAT THE JUDGE HAS MADE
13 VERY CLEAR THAT SHE DOES NOT WANT TO MOVE THE TRIAL DATE
14 THAT'S SET FOR JANUARY OF NEXT YEAR JUST BECAUSE THESE
15 NEW ENTITIES WERE ADDED IN LATE. SHE FEELS VERY
16 STRONGLY SHE WANTS TO KEEP THAT TRIAL DATE. SHE KNOWS
17 THAT ALL OF THE PLAINTIFFS WHO ARE THE VICTIMS OF THIS
18 FIRE HAVE BEEN ALREADY WAITING AND ARE EAGER TO HAVE
19 THEIR DAY IN COURT, AND SHE FEELS STRONGLY ABOUT KEEPING
20 THAT. SO WE TAKE THAT AS A PRETTY GOOD SIGN. AND ALL
21 OF THE NEW CROSS-DEFENDANTS ALSO MADE CLEAR THAT THEY,
22 IN NO WAY, WANT TO DELAY INDIVIDUAL PLAINTIFF'S CASES.
23 THEY DON'T WANT TO DELAY THAT TRIAL DATE. THEY DON'T
24 WANT TO DELAY RECOVERIES FOR INDIVIDUAL PEOPLE.

25 SO IN ADDITION TO THE MOTIONS THEY WILL FILE TO
26 DISMISS CLAIMS, I THINK THAT THE INDIVIDUAL PLAINTIFFS,
27 WE'RE LIKELY TO FILE SOME KIND OF MOTION TO SEVER,
28 BASICALLY, ANY OF THE CLAIMS AGAINST THESE OTHER

1 ENTITIES FROM ALL OF YOUR DIRECT CLAIMS AGAINST SCE. WE
2 THINK THEY ARE SEPARATE ISSUES. WE CAN GO FORWARD WITH
3 A TRIAL THAT IS INDIVIDUAL PEOPLE AGAINST SCE, FIGURE
4 THAT OUT, AND PUT THE OTHER CROSS CLAIMS TO THE SIDE FOR
5 NOW. SO THAT'S SOMETHING THAT PLAINTIFFS ARE STILL
6 DISCUSSING AND STRATEGIZING THE BEST ARGUMENTS TO MAKE
7 THERE. BUT AGAIN, THE JUDGE SIGNALLED THAT SHE IS PRETTY
8 RECEPTIVE TO THAT END RESULT OF A SOLUTION TO MANAGE
9 THIS LITIGATION THAT KEEPS THAT JANUARY TRIAL DATE AND
10 LETS THE LITIGATION MOVE FORWARD AND NOT GET SIDETRACKED
11 OR DELAYED BY THE ADDITION OF THESE NEW ENTITIES. SO
12 THAT'S ONE UPDATE OF LATE.

13 THE OTHER ONE THAT WAS DISCUSSED FOR A WHILE AT
14 THE HEARING YESTERDAY WAS HOW THE COURT WANTS TO SELECT
15 WHO IS GOING TO BE IN THAT FIRST TRIAL. THERE IS
16 OBVIOUSLY THOUSANDS OF PLAINTIFFS WHO HAVE FILED SUIT
17 ALREADY, THOUSANDS OF PEOPLE WHO WERE HARMED BY THIS
18 FIRE. AND THE JUDGE HAS SO FAR JUST SET THE FIRST DATE
19 AND SHE'S JUST FIGURING OUT HOW WE'RE GOING TO CHOOSE
20 WHO IS GOING TO BE JUST IN THAT FIRST TRIAL DATE. AND
21 WHAT THE COURT AND THE JUDGE WANTS TO DO -- SHE CAME IN
22 WITH A PRETTY STRONG VIEW -- IS BASICALLY FOCUS ON A
23 GROUP OF PLAINTIFFS WHO FILED EARLY ON AND HAVE ALREADY
24 COMPLETED ALL OF THEIR QUESTIONNAIRES AND, FROM THAT,
25 RANDOMLY SELECT A GROUP OF PLAINTIFFS WHO WILL BE
26 POTENTIALLY IN THAT FIRST TRIAL, AND HER GOAL IS THAT WE
27 WOULD END UP WITH SORT OF A SMALL BATCH RANDOMLY
28 SELECTED THAT WOULD BE REPRESENTATIVE OF A COUPLE

1 DIFFERENT CATEGORIES OF PLAINTIFFS.

2 THE ONES SHE WANTS TO BE REPRESENTED AT THE
3 FIRST TRIAL ARE PEOPLE WHO HAD A TOTAL LOSS OF THEIR
4 HOME, PEOPLE WHO HAD A PARTIAL LOSS OF THEIR HOME, AND
5 THEN PEOPLE WHO SUFFERED SMOKE AND ASH DAMAGE TO THEIR
6 HOME, ARE SORT OF THE THREE BUCKETS SHE SAID, "I WANT
7 SOME PEOPLE FROM EACH OF THOSE BUCKETS IN THAT FIRST
8 TRIAL." AND SHE ALSO WANTS TO HAVE SOME OF THE
9 PLAINTIFFS IN THE FIRST TRIAL BE FOLKS WHO ARE ELDERLY
10 AND HAVE MEDICAL CONDITIONS SINCE, UNDER CALIFORNIA LAW,
11 THEY MIGHT BE ENTITLED TO SOME KIND OF PREFERENCE IN
12 GOING TO TRIAL. SO THE DETAILS ARE STILL TO BE WORKED
13 OUT, BUT THAT'S KIND OF THE GIST OF WHAT THE COURT
14 WANTS.

15 FROM OUR STANDPOINT, THIS IS ONLY THE FIRST
16 TRIAL, AND ULTIMATELY, THERE IS ONLY -- AGAIN, OUT OF
17 THOUSANDS OF PLAINTIFFS, IT'S GOING TO GET WHITTLED DOWN
18 SORT OF RANDOMLY, THEN THE JUDGE IS GOING TO CHOOSE
19 WHICH HOUSEHOLDS, ULTIMATELY, ARE IN THAT FIRST TRIAL.
20 IT PROBABLY IS ONLY GOING TO BE 5 TO 10 HOUSEHOLDS IN
21 THAT FIRST TRIAL DATE. THE GOAL IS THAT A FIRST TRIAL
22 WOULD GIVE US A LOT OF INFORMATION ABOUT EVERYBODY AND
23 WOULD PUT A TON OF PRESSURE ON SCE THAT WOULD BENEFIT
24 EVERYBODY.

25 OFTEN, HOW THESE KIND OF LITIGATIONS WORK WITH
26 LOTS OF PLAINTIFFS IS THAT YOU HAVE A FIRST TRIAL OR
27 TWO. THEY ARE OFTEN CALLED BELLWETHER PLAINTIFFS. THEY
28 ARE KIND OF JUST A SAMPLE. THEN THAT PUTS A LOT OF

1 PRESSURE ON THE DEFENDANT TO, PERHAPS, SETTLE GLOBALLY
2 WITH EVERYONE WHO FILED SUIT AGAINST THEM, AND IT JUST
3 WILL GIVE INFORMATION ABOUT WHAT AN EXAMPLE OF WHAT A
4 PERSON'S DAMAGES MIGHT BE, WHAT KIND OF JURY VERDICT CAN
5 A PLAINTIFF GET IN A CASE LIKE THIS. SO THAT'S SORT OF
6 THE HOPE FOR THIS FIRST TRIAL.

7 WE, AT EDELSON, PLAN TO KEEP ASKING THE COURT
8 TO SET ADDITIONAL TRIAL DATES. WE THINK IT IS IMPORTANT
9 THAT -- THE FIRST JANUARY DATE IS GREAT, AND WE WANT
10 THAT TO PUT PRESSURE ON SCE, BUT WE WANT TO KEEP THE
11 PRESSURE ON THEREAFTER, SO WE PLAN TO ASK THE COURT IS
12 TO SET MORE DATES SO THAT WE CAN KEEP THE PRESSURE ON
13 AND ALSO JUST MAKE SURE THAT FOLKS WHO WANT TO HAVE
14 THEIR DAY IN COURT HAVE A PATH AND AN OPPORTUNITY TO DO
15 THAT. SO THAT'S THE BULK OF WHAT WAS DISCUSSED AT THE
16 HEARING YESTERDAY.

17 A COUPLE OTHER GENERAL UPDATES ON HOW DISCOVERY
18 IS GOING IN THE LITIGATION AS A WHOLE, WE'VE GOTTEN A
19 LOT OF DOCUMENTS FROM SCE. WE'RE CONTINUING TO PUSH FOR
20 MORE. WE'VE STARTED TAKING DEPOSITIONS OF SCE EMPLOYEES
21 TO FIND OUT MORE ABOUT BOTH HOW THE FIRES STARTED,
22 EXACTLY WHY, WHAT WENT WRONG WITH THEIR ELECTRICAL
23 EQUIPMENT, BUT THEN ALSO TO FIND OUT THINGS ABOUT THEIR
24 COMPANY POLICIES. SO WE'RE GOING TO KEEP PURSUING THAT,
25 GETTING MORE DOCUMENTS, SETTING MORE DEPOSITIONS.

26 THE PLAINTIFFS ARE CURRENTLY FIGHTING TO TAKE
27 DEPOSITIONS OF CERTAIN OFFICERS AND EMPLOYEES OF EDELSON
28 INTERNATIONAL, WHICH IS THE PARENT COMPANY, WHO IS ALSO

1 NAMED AS A DEFENDANT IN THE LAWSUIT. SCE AND EDISON
2 INTERNATIONAL ARE RESISTING. THEY DON'T WANT THOSE
3 DEPOSITIONS TO BE TAKEN. WE FILED A MOTION TO COMPEL
4 THOSE DEPOSITIONS, AND WE'RE GOING TO FIGHT THAT OUT IN
5 COURT. I THINK THE HEARING IS SET FOR A MONTH FROM NOW.

6 IN TERMS OF ALL THE DISCOVERY THAT PLAINTIFFS
7 ARE DOING, ALL OF OUR CLIENTS AND PLAINTIFFS ACROSS THE
8 LITIGATION ARE ALL AT DIFFERENT PHASES. I'M SURE THAT
9 MOST, IF NOT ALL, OF YOU HAVE HEARD FROM US, MAYBE A LOT
10 OF REMINDERS ABOUT WHERE YOU ARE AND WHAT PHASE YOU'RE
11 AT. SO IF SOMEONE IS NOT YET ON FILE, WE'VE BEEN
12 REACHING OUT, TRYING TO GET IN TOUCH TO MAKE SURE WE GET
13 THE INFO WE NEED TO GET YOUR COMPLAINT ON FILE. AND
14 THEN FOLKS ARE AT DIFFERENT PHASES OF THE PROCESS OF
15 FILLING OUT THE QUESTIONNAIRES, FACT SHEET, LIABILITY
16 QUESTIONNAIRE, DAMAGE QUESTIONNAIRE, ALL THOSE E-MAILS
17 YOU'VE BEEN GETTING FROM US.

18 SO I JUST WANTED TO SAY THANK YOU FOR ALL OF
19 THE WORK THAT FOLKS HAVE BEEN PUTTING IN RESPONDING TO
20 THOSE. I KNOW THAT IT TAKES TIME AND IT CAN BE A PAIN,
21 AND WE REALLY APPRECIATE ALL YOUR HARD WORK. AND THEN
22 JUST ALSO TO REITERATE THAT, WHILE IT'S A PAIN, IT IS
23 REALLY IMPORTANT TO GET THOSE DONE IN ORDER TO COMPLY
24 WITH COURT DEADLINES. SO OUR TEAM HAS BEEN REACHING
25 OUT, E-MAIL, CALLS, AND WE JUST ASK THAT YOU CONTINUE TO
26 PAY ATTENTION TO THOSE, RESPOND TO THOSE, BECAUSE WE
27 WANT TO MAKE SURE THAT EVERYBODY STAYS ON TRACK, MEETS
28 THEIR DEADLINES SO THAT THEIR CASE CAN MOVE FORWARD.

1 SO THAT IS THE SORT OF SUMMARY OF WHERE THINGS
2 ARE. DEVIN, JULIA, DID I MISS ANYTHING BEFORE I MOVE ON
3 TO INDIVIDUAL QUESTIONS?

4 MS. CONLEY: NO. THANK YOU FOR THAT
5 INFORMATION, AMY.

6 I'LL JUST SAY, SHAMELESS PLUG HERE, THANK YOU,
7 EVERYONE, FOR PROVIDING US EVERYTHING YOU CAN SO THAT WE
8 CAN HELP MOVE YOU THROUGH THE DISCOVERY PROCESS. I WILL
9 SAY -- AMY ALREADY TOUCHED ON THIS, BUT I WANT TO SORT
10 OF REITERATE -- ONE THING THE JUDGE DID EMPHASIZE IS
11 THAT TO BE CONSIDERED AS PART OF THE TRIAL, DISCOVERY
12 HAS TO BE COMPLETE. SO IF THAT IS SOMETHING THAT YOU'RE
13 INTERESTED IN AND IF YOU'RE ELIGIBLE, WE WANT TO HELP
14 YOU GET THERE.

15 IF YOU ARE GOING THROUGH THE PHASE OF WHERE
16 YOU'RE NOT QUITE ON FILE YET, WE'RE HAPPY TO TRY TO GET
17 YOU THERE AND THEN WORK YOU THROUGH THE ADDITIONAL STEPS
18 NECESSARY. BOTH JULIA AND MYSELF AS WELL AS EVERYONE IN
19 THE PASADENA AND BRENTWOOD OFFICE AND THE REST OF THE
20 TEAM, WE'RE MORE THAN HAPPY TO CONNECT WITH YOU. IF YOU
21 NEED TO COME INTO THE OFFICE, IF THAT'S JUST GOING TO BE
22 EASIER, WE'RE HAPPY TO SCHEDULE A TIME. WE JUST WANT TO
23 MAKE SURE WE'RE COMPLYING WITH EVERYTHING, AND THEN ALSO
24 THAT JUST HELPS STRENGTHEN YOUR CASE DOWN THE ROAD, I'LL
25 SAY.

26 MS. HAUSMANN: GREAT. SO I'LL MOVE ON TO
27 QUESTIONS THAT FOLKS SUBMITTED IN ADVANCE. THANK YOU,
28 AGAIN, FOR PEOPLE WHO SEND THEM IN.

1 I'LL SAY, AT THE OUTSET, SOMEONE WANTED TO JUST
2 CONFIRM THAT QUESTIONS WON'T BE HELD AGAINST THEM IN ANY
3 WAY. THE ANSWER IS OF COURSE NOT. WE'RE HERE TO ANSWER
4 ANY QUESTIONS YOU HAVE. QUESTIONS YOU SUBMIT TO US ARE
5 COVERED BY THE ATTORNEY-CLIENT PRIVILEGE. THIS TOWN
6 HALL IS PRIVILEGED COMMUNICATION. SO YOU SHOULD FEEL
7 FREE TO CONTINUE TO SUBMIT QUESTIONS, EITHER HERE OR, OF
8 COURSE, YOU CAN ALWAYS REACH OUT TO YOUR POINT OF
9 CONTACT OR ANY OF US AND SHOULD NOT SHY AWAY FROM DOING
10 THAT.

11 SO ONE QUESTION THAT -- WE GOT A COUPLE
12 QUESTIONS ABOUT THIS, ACTUALLY. SOMEONE WANTED TO KNOW,
13 ARE WE ABLE TO REASSESS LOSSES BASED ON THE LONG-TERM
14 IMPACTS OF THE EATON FIRE? SIMILARLY, SOMEONE WANTED TO
15 KNOW IF IT'S POSSIBLE TO AMEND THEIR QUESTIONNAIRES OR
16 AMEND THEIR DESCRIPTION OF THEIR DAMAGES IF THEY THINK
17 THAT THEY LEFT SOMETHING OFF. SO THE ANSWER IS
18 ABSOLUTELY, WE CAN AMEND QUESTIONNAIRES AT ANY TIME UP
19 THROUGH SETTLEMENT NEGOTIATIONS AND TRIAL. WE CAN AND
20 WE SHOULD IF NEW INFORMATION COMES TO LIGHT. IT'S VERY
21 NORMAL, AND IT IS TO BE EXPECTED IN CASE LIKE THIS. A
22 LOT OF PEOPLE'S DAMAGES WILL CONTINUE TO EVOLVE.

23 I KNOW A LOT OF PEOPLE ARE CONTINUING TO ACCRUE
24 DAMAGES AS THEY REMEDIATE THEIR HOMES. A LOT OF PEOPLE
25 ARE STILL DISPLACED AND ARE ACCRUING DAMAGES AS THEY
26 HAVE TO PAY OUT-OF-POCKET TO NEW RENT AND WHAT NOT, NEW
27 SUPPLIES, NEW FURNITURE. SO IT'S NORMAL THAT DAMAGES
28 WILL CONTINUE TO EVOLVE. YOU MIGHT HAVE SOME LONG-TERM

1 IMPACTS THAT YOU DIDN'T REALIZE WHEN YOU FILLED OUT YOUR
2 QUESTIONNAIRE THAT COMES TO LIGHT, A MEDICAL ISSUE, A
3 MENTAL HEALTH CONCERN, ANYTHING LIKE THAT. SO
4 ABSOLUTELY, JUST KEEP US APPRISED, AND WE CAN AND WE
5 SHOULD AMEND RESPONSES AS NEW INFORMATION COMES TO
6 LIGHT.

7 A COUPLE OTHER FOLKS WERE ASKING ABOUT WHETHER
8 IT'S TRUE THAT SOME SURVIVORS HAVE ALREADY STARTED
9 DEPOSITIONS AND THAT PROCESS. THE ANSWER IS THAT SCE
10 HAS STARTED DOING DEPOSITIONS OF SOME FIRE SURVIVORS.
11 THEY ARE STARTING WITH THE CROWD THAT I MENTIONED
12 EARLIER, WHO ARE ELDERLY AND HAVE MEDICAL CONDITIONS.
13 THE REASON FOR THAT IS THAT, UNDER CALIFORNIA LAW, THOSE
14 FOLKS MIGHT BE ENTITLED TO SOME KIND OF PREFERENCE IN
15 TERMS OF SETTING TRIAL. IT'S ALSO JUST IT'S IMPORTANT
16 THAT THEY GET A CHANCE TO RECORD THEIR TESTIMONY NOW
17 JUST, OF COURSE, IN THE EVENT THAT THEIR CONDITION
18 DETERIORATES. SO THOSE ARE THE DEPOSITIONS GOING
19 FORWARD RIGHT NOW. REST ASSURED THAT IF AND WHEN IT
20 COMES TIME FOR YOU TO BE DEPOSED, WE'LL LET YOU KNOW.

21 ALSO, AS YOUR LAWYERS, WE WOULD BE WITH YOU
22 THROUGHOUT THAT WHOLE PROCESS. SO WE WOULD HELP YOU
23 PREPARE FOR DEPOSITION. WE CAN TELL YOU GENERALLY WHAT
24 DEPOSITIONS ARE LIKE, BUT ALSO WE'RE GETTING A LOT OF
25 INFORMATION ABOUT THE SPECIFIC QUESTIONS THAT SCE IS
26 ASKING PLAINTIFFS IN THIS CASE, SO WE'LL HAVE A PRETTY
27 GOOD IDEA OF WHAT THEY ARE LIKELY TO ASK IN PEOPLE'S
28 DEPOSITIONS. WE ALWAYS HELP CLIENTS PREPARE AND THEN

1 ARE WITH YOU, OF COURSE, AT THE ACTUAL DEPOSITION AND
2 ARE THERE AS YOUR ADVOCATE AT THE DEPOSITION. SO
3 NOTHING TO WORRY ABOUT YET, AND WE'LL LET YOU KNOW WHEN
4 THE TIME COMES. RIGHT NOW, IT'S FOCUSED, REALLY, ON THE
5 POPULATION OF FOLKS WHO ARE ELDERLY AND HAVE SERIOUS
6 MEDICAL CONDITIONS.

7 MS. CONLEY: TO CLARIFY, AMY, JUST BECAUSE YOU
8 HAVE A CASE ON FILE AND YOU'RE GOING THROUGH DISCOVERY,
9 THAT DOESN'T NECESSARILY MEAN THAT YOU'RE GOING TO BE
10 DEPOSED, JUST IN GENERAL, WE'LL SAY. THAT'S ALSO
11 SOMETHING THAT THE COURT IS ALSO CONSIDERING IS WHO,
12 OUTSIDE OF THESE SPECIFIC GROUPS OF THE ELDERLY
13 PLAINTIFFS, WHO OUTSIDE MAY HAVE TO BE DEPOSED, BUT NOT
14 NECESSARILY EVERYONE IN THE CASE.

15 MS. HAUSMANN: ABSOLUTELY. THAT IS A GREAT
16 POINT. IN A CASE OF THIS SIZE, IT'S UNLIKELY THAT SCE
17 WILL DEPOSE ALL THOUSANDS OF PLAINTIFFS WHO ARE ON FILE,
18 SO YOU MIGHT NEVER BE DEPOSED. IF YOU GET SET FOR
19 TRIAL, PERHAPS YOU WOULD BE -- IF THAT WERE TO COME UP,
20 WE WOULD BE WITH YOU EVERY STEP OF THE WAY.

21 A COUPLE OTHER FOLKS WERE ASKING WHEN THEY
22 WOULD START GETTING QUESTIONNAIRES AND ALSO IF THEIR
23 CASE NUMBER WOULD TELL THEM WHERE THEY ARE IN THE QUEUE.
24 SO THE DEADLINES FOR THE QUESTIONNAIRES ARE TRIGGERED
25 BASED ON WHEN YOUR CASE WAS FILED. BUT AGAIN, DON'T
26 WORRY, BECAUSE WE'RE KEEPING TRACK OF EVERYBODY'S
27 DEADLINES. AND IF YOU HAVE A DEADLINE COMING UP, I
28 ASSURE YOU, YOU'LL HEAR FROM US. AS I'M SURE MANY OF

1 YOU KNOW, WE'LL BE IN YOUR INBOX AND CALLING YOU A LOT,
2 SO YOU'LL KNOW.

3 AND IN TERMS OF THE QUEUE, FORGETTING A TRIAL
4 DATE, AS I EXPLAINED BEFORE, THE COURT IS, AS A FIRST
5 STEP, FIGURING OUT WHO SHE IS GOING TO SELECT FOR THAT
6 FIRST TRIAL DATE. THAT IS GOING TO BE FROM THE POOL OF
7 PEOPLE WHO WERE ON FILE FIRST, BUT IT'S GOING TO BE A
8 RANDOM SELECTION WITHIN THAT. SO THERE IS NOT REALLY A
9 CLEAR QUEUE IN THAT SENSE. SO AGAIN, WE'LL KEEP YOU
10 UPDATED AS ALL OF YOUR DEADLINES COME UP.

11 COUPLE QUESTIONS ABOUT POTENTIAL SETTLEMENT OF
12 THE LITIGATION. SOMEONE ASKED, "WILL THIS SETTLE BEFORE
13 THE TRIAL DATE?" WE DON'T KNOW FOR SURE. WE CAN NEVER
14 BE CERTAIN ABOUT THAT. I'LL SAY THAT THE VAST MAJORITY
15 OF -- REALLY ALL CIVIL LITIGATION SETTLES BEFORE TRIAL,
16 AND THAT IS TRUE IN WILDFIRE LITIGATION AS WELL. SO IF
17 I WERE A BETTING WOMAN, YES, I WOULD GUESS, BUT WE DON'T
18 KNOW ANYTHING FOR SURE AND JUST HAVE TO SEE HOW
19 EVERYTHING UNFOLDS. WHAT I THINK IS IMPORTANT IS THAT
20 HAVING THE TRIAL DATE AND MARCHING TOWARD THAT PUTS A
21 LOT OF PRESSURE ON SCE, SO THAT IS OUR FOCUS RIGHT NOW.

22 AND THEN SOMEONE ON THE OTHER SIDE OF
23 SETTLEMENT ASKED HOW LONG AFTER SETTLEMENT OFFER WOULD
24 YOU ACTUALLY GET THE FUNDS? I'LL GIVE A TWO-PART ANSWER
25 TO THAT ONE. IF THE QUESTION WAS ABOUT SCE'S DIRECT
26 COMPENSATION PROGRAM, THAT THAT LAYS OUT A SUGGESTED
27 TIMELINE UNDER THEIR FAST PAY OPTION THAT I THINK IT'S
28 90 DAYS FOR THEM TO MAKE AN OFFER, AND THEN THEY SAY

1 THAT THEY WILL SEND OUT PAYMENTS 30 DAYS AFTER THEY GET
2 ALL OF THE -- IF THE OFFER IS ACCEPTED, 30 DAYS AFTER
3 THEY GET ALL THE NECESSARY FORMS. FOR THE MORE DETAILED
4 REVIEW, THEY DON'T OFFER ANY KIND OF TIMELINE. THEY
5 THINK IT MIGHT TAKE UP TO NINE MONTHS TO REVIEW
6 MATERIALS, AND THEN THEY DON'T GIVE ANY KIND OF
7 ESTIMATES AS FAR AS WHEN PAYMENTS WOULD ACTUALLY GO OUT.
8 THAT IS THE INFORMATION WE HAVE ABOUT THEIR COMPENSATION
9 PROGRAM.

10 UNDER A SETTLEMENT REACHED THROUGH LITIGATION
11 THAT ATTORNEYS ARE NEGOTIATING, IT DEPENDS ON THE NATURE
12 OF THE SETTLEMENT. IF IT'S AN INDIVIDUAL SETTLEMENT,
13 SOMETIMES IT CAN BE QUITE QUICK. IF IT IS A GLOBAL
14 SETTLEMENT THAT INVOLVES ALL OF OUR CLIENTS OR ALL OF
15 THE PLAINTIFFS AS A WHOLE, THAT CAN BE A LONGER PROCESS.
16 SO UNFORTUNATELY, WE CAN'T OFFER TOO MUCH OF AN ESTIMATE
17 YET, BUT OF COURSE, IN THAT CIRCUMSTANCE, WE WOULD SHARE
18 YOUR GOAL OF GETTING FUNDS OUT AS QUICKLY AS WE COULD.

19 SOMEONE ASKED A GOOD QUESTION ABOUT THE STATE
20 WILDFIRE FUND AND WHETHER THAT MIGHT LIMIT A SETTLEMENT
21 OR RECOVERY IN THIS CASE. SO IT'S TRUE THAT CALIFORNIA
22 HAS A PUBLIC WILDFIRE FUND THAT SCE IS A PART OF. THE
23 WAY IT WORKS IS THAT SCE WOULD PAY THE FIRST BILLION
24 DOLLARS OF DAMAGE FOR A FIRE THEY CAUSED, AND THEN THE
25 FUND WOULD KICK IN TO COVER ADDITIONAL DAMAGE AFTER
26 THAT.

27 I THINK RIGHT NOW THE FUND HAS OVER \$20 BILLION
28 IN IT. AND IN THE FALL, THE CALIFORNIA LEGISLATURE

1 VOTED TO INCREASE THAT NUMBER EVEN MORE. THERE IS STILL
2 ONGOING ACTIVITY IN THE LEGISLATURE. I JUST SAW NEWS
3 THE OTHER DAY ABOUT THE LEGISLATURE ASKING THE FEDERAL
4 GOVERNMENT TO CHIP INTO THE STATE FUND. SO THAT FUND,
5 THERE IS STILL LEGISLATIVE ACTIVITY GOING ON. THE FUNDS
6 MIGHT INCREASE EVEN MORE.

7 I THINK THAT OUR VIEW IS THAT IT'S UNLIKELY
8 THAT ANY SETTLEMENT WILL BE LIMITED BY THAT STRUCTURE.
9 THE PURPOSE OF THE FUND WAS TO MAKE SURE THAT PEOPLE
10 COULD GET THE RECOVERIES THEY NEED IN A SITUATION LIKE
11 THIS. THE INCREASE OF FUNDING THAT HAPPENED IN THE
12 FALL, I THINK, WAS DRIVEN IN LARGE PART, IF NOT
13 ENTIRELY, BY THE EATON FIRE AND CONCERNS THAT THEY
14 WANTED TO MAKE SURE THERE WAS ENOUGH IN THE FUND TO
15 COVER THE DAMAGES THERE. SO I DON'T THINK THAT THERE IS
16 A CONCERN THAT THERE WILL BE A LIMIT ON ANY SETTLEMENT
17 BECAUSE OF THAT.

18 THERE WERE A NUMBER OF QUESTIONS ALSO ABOUT
19 INSURANCE COVERAGE AND HOW THAT MIGHT WORK. SOMEONE
20 ASKED, "IS IT TRUE THAT THE INSURANCE COMPANY WILL GET
21 PAID FROM MY PROCEEDS AND THEN I'LL GET WHAT IS LEFT?"
22 IT'S A GREAT QUESTION. IT'S IMPORTANT TO REMEMBER THAT
23 THE INSURANCE COMPANIES ARE ALL IN THIS LAWSUIT ALSO.
24 THEY ALL FILED CLAIMS THEMSELVES AGAINST SCE. SO WHAT
25 WE'VE SEEN IN OTHER WILDFIRE LITIGATION IS, OFTENTIMES,
26 THE INSURANCE COMPANIES WILL REACH SOME KIND OF
27 SETTLEMENT OR RESOLUTION FIRST, AND THEN THEY WILL JUST
28 KIND OF BE DONE.

1 THEY HAVE ALREADY GOTTEN SOME MONEY. THE LEGAL
2 RIGHTS ARE A LITTLE BIT COMPLICATED. WE'VE NOT SEEN
3 INSURANCE COMPANIES GO AFTER A FIRE VICTIM'S RECOVERY IN
4 THE PAST. LIKE, IF AN INDIVIDUAL GETS A SETTLEMENT OF
5 SOME KIND, WE HAVE NOT SEEN INSURANCE COMPANIES THAT
6 WILL COME AND TRY TO CLAIM A PORTION OF IT. USUALLY,
7 THEY GET THEIR OWN SEPARATE RECOVERY. SO I DON'T THINK
8 THAT THAT IS A CONCERN IN ANY KIND OF SETTLEMENT
9 SITUATION.

10 IN THE EVENT OF A TRIAL VERDICT, IT IS POSSIBLE
11 THAT IF A JURY WERE TO AWARD SOMEONE DAMAGES, THERE
12 MIGHT BE WHAT IS CALLED A SET-OFF FOR ANY AMOUNT THAT
13 WAS ALREADY COVERED BY INSURANCE, AND THAT JUST MAKES
14 SURE THAT IF, LET'S SAY YOU LOST WHAT IS WORTH A DOLLAR
15 AND INSURANCE COVERED \$0.50 OF IT, YOU WOULD STILL GET
16 THE OTHER \$0.50. THEY ARE JUST MAKING SURE YOU WOULDN'T
17 DOUBLE RECOVER. YOU WOULDN'T GET YOUR WHOLE DOLLAR PLUS
18 YOU GOT \$0.50 FROM INSURANCE, SO YOU GOT MORE THAN YOUR
19 LOSSES.

20 THERE MIGHT BE A SET-OFF LIKE THAT IF WE WERE
21 IN A TRIAL SITUATION, BUT I THINK THAT SCE IS HELD
22 LIABLE. THEY HAVE TO PAY THE FULL EXTENT OF THEIR
23 DAMAGES. THEN YOU DON'T HAVE TO WORRY ABOUT THE
24 INSURANCE COMPANY TAKING OUT OF YOUR PROCEEDS. THEY
25 WOULD RECOVER SEPARATELY.

26 MS. CONLEY: ALSO, JUST TO ADD ON TOP OF THAT,
27 I GET THIS QUESTION A LOT, SO I ALWAYS LIKE TO ADDRESS
28 IT. IF WE ARE IN A SITUATION WHERE IT IS A TRIAL

1 SETTING AND YOUR CLAIM HAS TO BE CONSIDERED, MAYBE BEING
2 OFFSET BY THE INSURANCE, THAT IS ALSO JUST ONLY RELATING
3 TO A COUPLE OF THE CLAIMS YOU HAVE THAT YOU WERE
4 SPECIFICALLY COVERED IN INSURANCE FOR. THERE IS A
5 MYRIAD OF OTHER CLAIMS WE CAN TRY TO RECEIVE
6 COMPENSATION OR RECOVERY FOR THAT INSURANCE DOESN'T
7 NECESSARILY IMPACT. SO THERE IS STILL AMPLE OPPORTUNITY
8 AND AREAS TO RECEIVE COMPENSATION, DESPITE IF YOU WERE
9 COMPLETELY COVERED BY INSURANCE.

10 MOST IMPORTANTLY, AS EVERYONE HERE HAS SEEN,
11 NON-ECONOMIC DAMAGES, THE EMOTIONAL AND MENTAL ANGUISH
12 YOU SUSTAINED, TYPICALLY ISN'T NECESSARILY IMPACTED BY
13 YOUR INSURANCE OFFSET. IT IS SOMETHING WE'VE SEEN
14 BEFORE. WE'RE USED TO HANDLING IT. WE'RE HAPPY TO HELP
15 YOU WITH YOUR INDIVIDUAL CIRCUMSTANCES, DEPENDING ON
16 WHAT YOUR INSURANCE POLICY MIGHT LOOK LIKE, BUT IT IS
17 SOMETHING WE'VE DEALT WITH BEFORE AND WE'RE HAPPY TO
18 ADDRESS SPECIFIC QUESTIONS RELATED TO YOUR POINT TOO.

19 MS. HAUSMANN: THAT IS A GREAT POINT. THANK
20 YOU, DEVIN.

21 THERE WAS SOME ADDITIONAL, MORE SPECIFIC
22 INSURANCE QUESTIONS ABOUT PEOPLE'S SPECIFIC
23 CIRCUMSTANCES. I CAN ANSWER GENERALLY. SOMEONE WAS
24 WONDERING ABOUT IF THEY HAVE INSURANCE BUT THEY
25 INTENTIONALLY CHOSE TO NOT FILE A CLAIM, IF THAT WOULD
26 SOMEHOW BE USED AGAINST THEM. THE ANSWER IS NOT REALLY.
27 I THINK YOU WOULD BE IN THE SAME BOAT AS SOMEONE WHO
28 JUST DIDN'T HAVE ANY INSURANCE COVERAGE AT ALL. BUT I

1 THINK THAT IF YOU HAVE SPECIFIC QUESTIONS ABOUT YOUR
2 INSURANCE POLICIES AND YOU'RE DEBATING WHETHER OR NOT TO
3 FILE A CLAIM, THAT IS SOMETHING, PROBABLY, WE SHOULD
4 JUST -- YOU CAN RAISE WITH US INDIVIDUALLY. AND FEEL
5 FREE TO REACH OUT. WE CAN TALK ABOUT YOUR INDIVIDUAL
6 CIRCUMSTANCES, THE SPECIFICS OF YOUR INSURANCE POLICY
7 AND SEE IF WE CAN HELP ANSWER SPECIFIC QUESTIONS THERE.

8 MS. CONLEY: ALSO, I KNOW A COUPLE OF QUESTIONS
9 HAVE COME UP BECAUSE MAYBE YOU'RE GETTING A LETTER IN
10 THE MAIL FROM YOUR INSURANCE COMPANY EXPLAINING THAT
11 THEY UNDERSTAND YOU'RE INVOLVED IN THE CASE BECAUSE THEY
12 ARE ALSO INVOLVED IN THE CASE. SOMETIMES THOSE LETTERS
13 COME OFF A LITTLE INTENSE SOMETIMES. THEY SOUND LIKE
14 THEY ARE GOING TO TAKE YOUR CHECK AND RUN AWAY WITH IT,
15 IF YOU WERE GOING TO RECEIVE ONE. WE'VE SEEN THAT. IT
16 IS COMMON. BUT IF YOU RECEIVE ONE, PLEASE FEEL FREE TO
17 SEND IT TO US JUST SO WE CAN TAKE A LOOK AT IT AND
18 VERIFY. BUT AGAIN, WE'RE PREPARED TO -- WE'VE SEEN THIS
19 SITUATION BEFORE. WE'RE PREPARED TO LOOK AT IT AND MAKE
20 SURE IT IS ON PAR FOR THE COURSE OF WHAT WE'VE SEEN
21 PREVIOUSLY.

22 MS. HAUSMANN: ALL RIGHT. THE TWO OTHER THINGS
23 I WANTED TO ADDRESS OF JUST QUESTIONS WE'VE BEEN GETTING
24 A LOT IN THE PAST COUPLE WEEKS THAT WE THOUGHT WE WOULD
25 JUST ADDRESS HERE, A HANDFUL OF PEOPLE, JUST IN THE PAST
26 WEEK, HAVE BEEN ASKING ABOUT FRIENDS THEY HAVE WHO ARE
27 POTENTIALLY INTERESTED IN SWITCHING FROM A DIFFERENT
28 FIRM TO US AND WERE JUST WONDERING IF THAT WAS STILL

1 POSSIBLE, ESPECIALLY IF THEY ALREADY HAVE A COMPLAINT ON
2 FILE. MAYBE THEY HAVE QUESTIONNAIRES UNDER WAY. AND AS
3 WE'VE BEEN TELLING PEOPLE AS THEY CALL IN INDIVIDUALLY,
4 THAT'S ABSOLUTELY DOABLE.

5 PEOPLE ALWAYS HAVE THE FREEDOM TO SWITCH
6 LAWYERS AT ANY TIME. AND AGAIN, IT'S NOT UNUSUAL, AND
7 THE TRANSITION IS RELATIVELY SMOOTH. ONE FIRM BASICALLY
8 JUST TRANSFERS THE ENTIRE CLIENT FILE OVER TO THE NEW
9 FIRM. SO IF ANYONE HAS THAT QUESTION, THEN FEEL FREE TO
10 REACH OUT TO US, AND THEY CAN GO TO OUR WEBSITE AND GET
11 IN TOUCH WITH OUR INTAKE TEAM THAT WAY.

12 SOMEWHAT SIMILARLY, A COUPLE PEOPLE HAD FRIENDS
13 WHO HADN'T REACHED OUT BECAUSE THEY WERE WORRIED THEY
14 WERE OUTSIDE OF THE FIRE PERIMETER. I THINK SCE, IN
15 THEIR COMPENSATION PROGRAM, TRIED TO DEFINE WHAT THEY
16 THOUGHT WAS THE PERIMETER OF AREAS THAT WERE AFFECTED.
17 THAT'S NOT REALLY A DEFINITIVE PERIMETER. THAT MIGHT BE
18 WHAT SCE THINKS. SO AGAIN, JUST BECAUSE SOMEONE MIGHT
19 BE OUTSIDE THAT REGION DOESN'T NECESSARILY MEAN THAT
20 THEY DON'T HAVE VERY REAL CLAIMS HERE.

21 AS JUST ONE CLEAR EXAMPLE, PEOPLE MILES AWAY
22 HAD SERIOUS SMOKE AND ASH DAMAGE, EVEN IF THEIR HOUSE
23 WASN'T BURNED, AND THERE'S VERY REAL ECONOMIC AND
24 NON-ECONOMIC HARMS FROM THAT. SO AGAIN, IF THAT IS
25 SOMETHING THAT APPLIES TO YOU OR YOUR FRIENDS, PEOPLE
26 SHOULD FEEL FREE TO REACH OUT, AND WE'RE HAPPY TO
27 DISCUSS WITH THEM.

28 I THINK THAT COVERS ALL OF THE QUESTIONS THAT

1 WE RECEIVED. AGAIN, UNLESS DEVIN OR JULIA HAVE ANYTHING
2 TO ADD, I THINK THAT PROBABLY IS IT FOR TONIGHT.

3 WE APPRECIATE EVERYONE COMING, TAKING THE TIME.
4 AND IF YOU HAVE OTHER QUESTIONS, ALWAYS FEEL FREE TO
5 REACH OUT TO DEVIN, TO ME, TO JULIA OR TO YOUR NORMAL
6 POINT OF CONTACT. WE'RE ALWAYS HERE FOR YOU AND HAPPY
7 TO ANSWER YOUR QUESTIONS.

8 MS. CONLEY: THANK YOU SO MUCH, AMY. I
9 APPRECIATE IT. THANK YOU, JULIA, FOR JOINING US. HAVE
10 A GOOD NIGHT EVERYONE. TAKE CARE. STAY SAFE OUT THERE.

11

12 (END OF PROCEEDINGS.)

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