

1 Peter Prows (SBN: 257819)
2 BRISCOE IVESTER & BAZEL LLP
3 235 Montgomery Street, Suite 935
4 San Francisco, CA 94104
5 Telephone: (415) 402-2700
6 E-mail: pprows@briscoelaw.net

7 *Attorney for Plaintiff Friends of the Earth*

8 Henry Weissmann (SBN: 132418)
9 MUNGER, TOLLES & OLSON LLP
10 350 South Grand Avenue, 50th Floor
11 San Francisco, CA 90071-3426
12 Telephone: (213) 683-9100
13 E-mail: henry.weissmann@mto.com

14 *Attorney for Defendant Pacific Gas and Electric Company*

15 Scott A. Kronland (SBN 171693)
16 ALTSHULER BERZON LLP
17 177 Post Street, Suite 300
18 San Francisco, CA 94108
19 Telephone: (415) 421-7151
20 E-mail: skronland@altber.com

21 *Attorney for Local 1245 and the Coalition of California Utility Employees*

22 [Additional Counsel On Signature Page]

23 SUPERIOR COURT OF THE STATE OF CALIFORNIA
24 COUNTY OF SAN FRANCISCO

25 FRIENDS OF THE EARTH,

26 Plaintiff,

27 v.

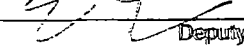
28 PACIFIC GAS AND ELECTRIC
COMPANY; INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL 1245;
COALITION OF CALIFORNIA UTILITY
EMPLOYEES; and DOES 1-20,

Defendants.

FILED
San Francisco County Superior Court

JUL 27 2023

CLERK OF THE COURT

BY:  Deputy Clerk

Case No. CGC-23-605757

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE HEARING ON
DEMURRERS**

Dept.: 304
Judge: Hon. Ethan P. Schulman
Action Filed: April 11, 2023
Trial Date: Not Set

Case No. CGC-23-605757

STIPULATION AND ~~PROPOSED~~ ORDER TO CONTINUE HEARING ON DEMURRERS

8183810L

1 **STIPULATION**

2 Plaintiff Friends of the Earth, Defendant Pacific Gas and Electric Company (“PG&E”),
3 Defendant International Brotherhood of Electrical Workers Local 1245 (“Local 1245”), and
4 Defendant Coalition of California Utility Employees (“CCUE”) (collectively, the “Parties”), by
5 and through their respective attorneys, hereby stipulate and agree as follows:

6 1. WHEREAS, Plaintiff filed the complaint on April 11, 2023;

7 2. WHEREAS, Defendants filed demurrers to the complaint on June 26, 2023,
8 Plaintiff filed its combined opposition on July 13, 2023, and Defendants filed their replies on July
9 19, 2023;

10 3. WHEREAS, Plaintiff filed an application for complex designation on July 6, 2023,
11 Defendants filed oppositions on July 13, 2023, and Plaintiff filed its reply on July 14, 2023;

12 4. WHEREAS, Defendants’ demurrers were scheduled to be heard on July 26, 2023;

13 5. WHEREAS, the Court issued an order granting complex designation on July 20,
14 2023 (“Order”);

15 6. WHEREAS, the Court’s Order vacated the hearing on Defendants’ demurrers
16 previously set for July 26, 2023, and set the hearing for August 1, 2023 in Department 304;

17 7. WHEREAS, the Court’s Order vacated the case management conference previously
18 set for September 13, 2023, and stated that an initial case management conference will be set at
19 the August 1, 2023 hearing;

20 8. WHEREAS, the Parties agree that, due to Defendants’ counsel’s scheduling
21 commitments, the hearing on Defendants’ Demurrers should be continued to August 21, 2023 or
22 August 23, 2023, or as soon as the matter can be heard by the Court thereafter, and that the timing
23 of an initial case management conference should be determined at the hearing on Defendant’s
24 demurrers;

25 IT IS HEREBY STIPULATED AND AGREED that:

26 The hearing on Defendants’ demurrers should be continued to August 21, 2023 at 9:00
27 a.m., or August 23, 2023, at 9:00 a.m., or as soon as the matter can be heard by the Court
28

1 thereafter. The timing of an initial case management conference should be determined at that
2 hearing.

3
4 **IT IS SO STIPULATED.**

5 Dated: July 25, 2023

MUNGER, TOLLES & OLSON LLP

6
7 By: /s/ Jeffrey Y. Wu
8 Henry Weissmann
9 Jeffrey Y. Wu
10 Attorney for Defendant PG&E

11 Dated: July 25, 2023

ALTSHULER BERZON LLP

12
13
14 By: /s/ Juhyung Harold Lee
15 Scott A. Kronland
16 Juhyung Harold Lee
17 Attorney for Defendants Local 1245 and CCUE

18 Dated: July 25, 2023

BRISCOE IVESTER & BAZEL LLP

19
20 By: /s/ Peter Prows
21 Lawrence S. Bazel
22 Peter Prows
23 Attorney for Plaintiff Friends of the Earth
24
25
26
27
28

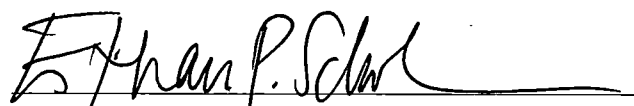
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


[PROPOSED] ORDER

Before the Court is a stipulation regarding the hearing date for the demurrers of Defendants [1] Pacific Gas and Electric; and [2] International Brotherhood of Electrical Workers Local 1245 and the Coalition of California Utility Employees. Good cause appearing therefor, the Court hereby APPROVES the stipulation. Defendants' demurrers shall be heard at ~~9:00~~^{11:00} a.m. on August 21, 2023] [~~9:00 a.m. on August 23, 2023~~]. The timing of an initial case management conference will be determined at that hearing.

IT IS SO ORDERED.

DATED: July 26, 2023


Hon. Ethan P. Schulman