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15

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **IN AND FOR THE COUNTY OF SAN MATEO**
18

19 Coordination Proceeding Special Title
(Rule 3.550)

20 PG&E "SAN BRUNO FIRE" CASES

21 TORT ACTIONS
22

JCCP No. 4648 A

TORT ACTIONS

**DEFENDANTS PACIFIC GAS AND
ELECTRIC COMPANY AND PG&E
CORPORATION'S AMENDED
MASTER ANSWER TO PLAINTIFFS'
UNVERIFIED MASTER COMPLAINT**

Before the Honorable Steven L. Dylina
Department 7

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27 Defendants Pacific Gas and Electric Company and PG&E Corporation file this amended
28 answer to make absolutely clear that PG&E does not blame the Plaintiffs and residents who

1 have been affected by this terrible accident and to specifically restate its long-held position
2 that none of the Plaintiffs or residents of San Bruno are at fault. The funds provided to the
3 Plaintiffs and residents immediately after the accident were given with no strings attached and
4 PG&E will not be seeking reimbursement. PG&E remains committed to assisting the Plaintiffs
5 and residents of San Bruno. The San Mateo County Superior Court has assured the parties that
6 resolution of these cases is its top priority and PG&E supports that goal. As required by law
7 and in accord with Case Management Order No. 1, defendants Pacific Gas and Electric
8 Company and PG&E Corporation (herein referred to as “answering defendants” and “PG&E”)
9 answer the Plaintiffs’ unverified Master Complaint and the adoption forms filed and to be filed
10 by the Plaintiffs (herein collectively referred to as the “Complaint”).

11 1. Pursuant to California Code of Civil Procedure section 431.30, in answering the
12 Complaint, answering defendants generally deny the allegations of the unverified Complaint.
13 As separate and affirmative defenses and in answer to the Complaint, without alleging fault by
14 the Plaintiffs for the incident, without the cause of the accident having been determined, and in
15 order to avoid any delay in the litigation, answering defendants now allege, as required by code:

16 2. The claims alleged in the Complaint fail to state facts sufficient to constitute a
17 cause of action against answering defendants.

18 3. The claims alleged in the Complaint are barred, in whole or in part, by the
19 applicable statute of limitations, including but not limited to California Code of Civil Procedure
20 section 338 (a)-(c).

21 4. The claims alleged in the Complaint are barred, in whole or in part, by law for
22 lack of jurisdiction, including but not limited to California Public Utilities Code section 1759.

23 5. The claims alleged in the Complaint are barred, in whole or in part, by accord
24 and satisfaction, payment and release, or estoppel. Notwithstanding the foregoing, the funds
25 provided to the Plaintiffs and residents immediately after the accident were given with no
26 strings attached and PG&E will not be seeking reimbursement.

27 6. The injuries or losses alleged in the Complaint were directly and proximately
28 caused, in whole or in part, by unforeseeable, intervening and/or superseding acts of persons or

1 entities other than answering defendants for whom answering defendants are not accountable.
2 PG&E does not blame the Plaintiffs and residents affected by the terrible accident and
3 specifically restates its long-held position that none of the Plaintiffs or residents are at fault.
4 The cause of the accident has not yet been determined so PG&E pleads a general response now
5 to avoid delay in the litigation.

6 7. To the extent the allegations in the Complaint are based on compliance with
7 applicable federal laws, regulations and rules, such claims are preempted by federal law.

8 8. The injuries or losses alleged in the Complaint are subject to the requirements of
9 the principles of mitigation.

10 9. The injuries or losses alleged in the Complaint may have been caused, in whole
11 or in part, by persons or entities, other than answering defendants, who may have been legally
12 responsible under the doctrine of comparative negligence, contributory negligence, or otherwise
13 at fault, for which the law provides apportionment of fault, reduction, off-set, indemnification or
14 contribution. PG&E does not blame the Plaintiffs or residents affected by the terrible accident
15 and specifically restates its long-held position that none of the Plaintiffs or residents are at fault.
16 The cause of the accident has not yet been determined so PG&E pleads a general response now
17 to avoid delay in the litigation.

18 10. The provisions of California Civil Code section 1431.2 are applicable to the
19 Complaint.

20 11. The claims alleged in the Complaint are barred, in whole or in part, by lack of
21 capacity or standing.

22 12. The claims in the Complaint are barred, in whole or in part, because they do not
23 meet the requirements of California Code of Civil Procedure sections 377.30 or 377.60, *et seq.*

24 13. The claims in the Complaint are barred, in whole or in part, because the
25 Complaint fails to join one or more necessary and/or indispensable parties.

26 14. The claims in the Complaint are barred, in whole or in part, because they have
27 been improperly joined in this action or proceeding.

28 15. Answering defendants allege that they complied with the applicable laws,

1 regulations, and rules and such compliance demonstrates that due care and reasonable prudence
2 were exercised.

3 16. The claims in the Complaint are barred, in whole or in part, because there is no
4 private right of action concerning matters regulated under applicable federal laws, regulations,
5 and/or other rules and requirements.

6 17. Alleged causes of action that are not pleaded in the Master Complaint are not at
7 issue or the subject of the proceeding.

8 18. Any allegations in the Complaint of deceit or misrepresentation fail to allege the
9 circumstances with particularity.

10 19. The claims in the Complaint, to the extent they arose from events occurring out-
11 of-state, are barred, in whole or in part, under principles of due process.

12 20. The claims in the Complaint are barred, in whole or in part, because materials
13 and matters alleged and complained about in the Complaint were consistent with available
14 technological, scientific and industrial state-of-the art and in compliance with applicable
15 regulations, and alternative product or facility design was not feasible or practical. PG&E does
16 not blame the Plaintiffs or residents affected by the terrible accident and specifically restates
17 its long-held position that none of the Plaintiffs or residents are at fault. The cause of the
18 accident has not yet been determined so PG&E pleads a general response now to avoid delay in
19 the litigation.

20 21. To the extent the claims are premised, in whole or in part, on alleged statements
21 or conduct in judicial, legislative, or administrative proceedings, such claims are barred under
22 the *Noerr-Pennington* doctrine and analogous provisions under the laws of California.

23 22. Under the circumstances alleged in the Complaint, restitution and/or
24 disgorgement are not an appropriate remedy.

25 23. Any claim by Plaintiffs for disgorgement is barred because any money or
26 property was not acquired by means of unfair competition or by means of any act in violation of
27 Business & Professions Code sections 17200 *et seq.*

28 24. The allegations in the Complaint do not permit the issuance or entry of injunctive

1 relief.

2 25. Alleged acts or omissions in the Complaint causing a nuisance on land were
3 unintentional and non-negligent and, therefore, not actionable.

4 26. The alleged acts in the Complaint were performed pursuant to statutory
5 authority, and thus cannot constitute a nuisance.

6 27. The allegations in the Complaint fail to state facts sufficient to support an award
7 of exemplary or punitive damages against answering defendants.

8 28. The Complaint fails to state a cause of action for which pre-judgment interest,
9 expert fees, or attorneys' fees may be awarded.

10 29. The damages alleged in the Complaint are not permitted by law or equity.

11 30. No alleged act or omission of answering defendants was oppressive, fraudulent,
12 or malicious under California Civil Code section 3294, and therefore, any award of punitive
13 damages is barred. Any claim for punitive damages also is barred under California Civil Code
14 section 3294(b).

15 31. No alleged act or omission of answering defendants was willful under California
16 Public Utilities Code section 2106, and therefore, any award of punitive damages is barred.

17 32. The claims in the Complaint for punitive damages are barred, in whole or in part,
18 because they violate state and federal constitutional rights, including but not limited to due
19 process, equal protection, and ex post facto provisions; the Fourth, Fifth, Sixth, Eighth and
20 Fourteenth Amendments; and the right not to be subjected to excessive awards and multiple
21 punishments; and any claim for punitive damages is limited by state and federal law, including
22 but not limited to the United States Supreme Court's decision in *State Farm Mutual Automobile*
23 *Ins. Co. v. Campbell* (2003) 123 S. Ct. 1513.

24 Inasmuch as the Complaint and/or Adoption Forms do not describe the claims alleged
25 by each plaintiff with sufficient particularity to enable answering defendants to determine all of
26 the affirmative defenses, answering defendants reserve the right to amend and/or supplement the
27 answer to assert any and all pertinent defenses ascertained through further investigation and
28 discovery. Answering defendants will rely on all defenses that may become available during

1 discovery or trial.

2 WHEREFORE, answering defendants pray that relief be afforded as provided by law
3 and for such other and further relief that the Court may deem just and proper.

4 **DEMAND FOR JURY**

5 Answering defendants respectfully request a trial by jury as to all issues so triable in
6 each action subject to the Complaint.

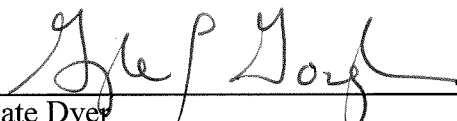
7 DATED: July 12, 2011

Respectfully submitted,

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By: 
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PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick LLP, One Market Plaza, Steuart Tower, 8th Floor, San Francisco, CA 94105-1008. On July 12, 2011, I served the within document(s):

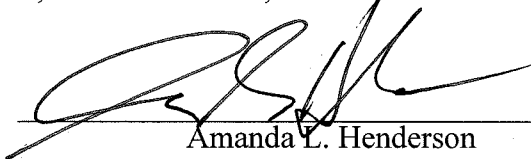
DEFENDANTS PACIFIC GAS AND ELECTRIC COMPANY AND PG&E CORPORATION'S AMENDED MASTER ANSWER TO PLAINTIFFS' UNVERIFIED MASTER COMPLAINT

- 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.
- 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.
- PERSONAL SERVICE - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- E-MAIL - by electronically transmitting the document(s) listed above to the email address(es) of the addressee listed below.
- 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.

SEE ATTACHED SERVICE LIST

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 12, 2011, at San Francisco, California.



Amanda L. Henderson

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SERVICE LIST SAN BRUNO LITIGATION

updated 6/30/2011

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Chiramberro, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 499865; *DeRenzi, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500340; *Falasco, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500341; *Lillie, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500363; *Magoolaghan, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 499867; *Maney v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500339; *Palavos v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500366; *Pellegrini, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 499863; *Ruggiero v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500365; *Vides, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 499866; *Whittemore, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500338. *Alash, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500502; *Chew, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500499; *Chung, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500557; *Hoenisch, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500501; *Montemarano, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500558; *Shurtz, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500559; *Wynschenk, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court Case No. 500500; *Barbieri, et al. v. Pacific Gas and Electric Company, et al.* San Mateo Superior Court 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 and Electric Company, et al.* San Mateo Superior Court Case No. 500785; *Migos, et al. v. Pacific*

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Gas and Electric Company, et al. San Mateo Superior Court Case No. 500926; Stokes, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 500927; Zastrow, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501233; Bologna v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501386; Franco v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501749; Balich v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501750; Salinda v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501751; Gibson v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501996; Reid v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 501997; Ferreira v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502096; Carney v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502529; Djunaidy v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502530; Pesce v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502531; Scerri v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502532; Welsh v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502896; Alarcon v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502897; Kim v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 502898; Darrah v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 503619; Guerrero v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 503620; Kang v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 503621; Caberto v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 503622; Tovar v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 504350; Levine v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 504351; Rogge v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 504352; Sandoval v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 505353; Diaz v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 506041; Guernsey, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 506042; Zapata, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 506043;

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	<i>Kayed, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 506044; Jensen, et al. v. Pacific Gas and Electric Company, et al. San Mateo Superior Court Case No. 506045</i>
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