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DUGAN BARR.....State Bar No. 40663
DOUGLAS MUDFORDState Bar No. 156392
ESTEE LEWIS.....State Bar No. 268358
CATIE BARR.....State Bar No. 295538
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CLERK OF THE SUPERIOR COURT
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D.H.
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OF COUNSEL:

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Attorneys for Plaintiffs

**THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SHASTA**

W. JAXON BAKER,
KATE BAKER,
JAROD ABRAHAM,
ROSEY ABRAHAM,
DONALD ADAMS,
DEBORAH ADAMS,
LYNN ADAMS,
BARBARA ALEXANDER,
CHRISTOPHER ALEXANDER,
DENNIS ALFARO,
MAILE ALFARO,
DEBRA ALLEN,
HEATHER ALVAREZ,
EDWARD ANDERSON,
ALBERT ANGEL,
RUTH ANGEL,
DEBHORA AUKLAND,
TED AUKLAND,
MICHAEL AUTORE,
RALPH AUTORE,
CHARLOTTE BAILEY,
JOE BAKER,
SHAUNA BAKER,
CHRISTOPHER BARNHART,

No. **192661**

**CLASS ACTION
COMPLAINT FOR DAMAGES**

- [1. Dangerous Condition of Property – As to State of California]
- [2. Dangerous Condition of Property – As to City of Redding]
- [3. Inverse Condemnation]
- [4. Trespass By Fire]
- [5. Timber Trespass]
- [6. Public Nuisance]
- [7. Private Nuisance]
- [8. Conversion]
- [9. Negligent Infliction of Emotional Distress]
- [10. Negligent Interference with Prospective Economic Advantage]
- [11. Wrongful Death - Ed Bledsoe and Sherry Bledsoe]
- [12. Wrongful Death – Terri Webb]

1 JO ELLEN BARNART,
2 JESUS BARRIOS,
3 ANGELEA BEARD,
4 JAMES BEARD,
5 DARRELL BENNEAU,
6 ASHLEY BERLINGHOFF,
7 LEANNE BERLINGHOFF,
8 ROY BERLINGHOFF,
9 THOMAS BIGDELY,
10 KIP BLANKENHEIM,
11 MELVIN BLANKENHEIM,
12 TED BLANKENHEIM,
13 AMBER BOLLMANN,
14 TIMOTHY BOLLMANN,
15 ROY BONGARD,
16 DENNIS BRADFORD,
17 SCOTT BREAR,
18 JOSE BRIONES,
19 LUIS BRIONES,
20 BRUCE BROWN,
21 ERIN BROWN,
22 MARIZ BROWN,
23 RUSSELL BROWN,
24 WILLIAM BROWN,
25 WINSTON BROWN,
26 ROBERT BRUCE,
27 LEE BRUSHETT,
28 MICHAEL BRUSHETT,
LORENE BRUSHETT,
TERRY BRUSHETT,
NEIL CARL BUCHHOLZ,
AMPARO BUCK,
TODD BUCK,
AMBER BUSH,
JENNIFER BUTLER,
KIM CAMERON,
STEVE CAMERON,
JEFF CARMACK,
MICHELLE CARMACK,
KATHLEEN CARPENTER,
SAMUEL CARPENTER,
ALICE CARTER,
PARVIN CARTER,
MAX CARTER STANLEY,
ARNEL CASTELO,
LUCY CASTELO,
CHRISTOPHER CATON,
KIM CATON,
TRISA CHAPARRO,
JAMES CHARLTON,
DOLORES CHIARA,
ROBERT CHIARA,
MARK CHITWOOD,
JULIE CHRISTIE,
NEIL CHRISTIE,

1 BENJAMINA COFFEY,
2 MICHAEL COFFEY,
3 EVELYN COLON,
4 JESUS CORONA,
5 TINA CORONA,
6 STEPHEN CORTOPASSI,
7 SUSAN CORTOPASSI,
8 ROBERT COTTRELL,
9 ALAN CRABTREE,
10 THE TRUST OF ALAN CRABTREE,
11 JON CROUSEY,
12 MISTIE CRUZ,
13 KOURTNIE CRUZ-MALENTINO,
14 KIM CRUZ-MALENTINO, a dependent adult
15 by and through her Guardian ad Litem, MISTIE
16 CRUZ,
17 JONATHAN DAGG,
18 SHARON DAGG,
19 ADAM DAHL,
20 ALICIA DAHL,
21 FLORA DAVIS,
22 WILLIAM DAVIS,
23 SUISIN DEAN,
24 KALPANA DHURVA,
25 SHISHIR DHURVA,
26 VICTORIA DOTY,
27 DAVID DUMALSKI,
28 MICHELE DUMALSKI,
SANDRA DURAN,
JUDY ECHELBERGER,
GARY EDWARDS,
PEGGY EDWARDS,
ROBERT EILER,
THERESA ELFORD,
SCOTT ELFORD,
JEANIE ELIASSEN,
NEIL ELIASSEN,
ADELE ENGLE,
ROBERT ENGLE,
AMELIA EVANS,
PAUL EVANS,
BERNEICE EVEREST,
GLEN EVEREST,
JENNIFER EVERETT,
JOHN EVERETT D.O. III,
RICHARD FALLER,
DIVAN FARD,
JOHN FELANDO,
MARCI FERNANDES,
BRETT FLOURNOY,
KATHLEEN FLOURNOY,
SUSAN GALEN,
MARIA GARCIA,
ALEXANDER GAXIOLA,
REBECCA GAXIOLA,

1 MARY ANN LARSON-GERKE,
2 ROBERT GERKE,
3 LOUISE GIRARD,
4 RONALD GIRARD,
5 RENEE GLASSBURN,
6 STEPHEN GLASSBURN,
7 JESSE GOMEZ,
8 ANGELA GONZALES,
9 CHRISTIAN GONZALEZ,
10 DAVID GONZELES,
11 JAMES GONZALEZ,
12 LINDA GONZALEZ,
13 GONZALEZ TRUST 2005,
14 CATHERINE GOSIN,
15 JASON GOSIN,
16 ROBERT GOSIN,
17 RYAN GOSIN,
18 MARVIN GRIM,
19 MONICA GRIM,
20 MELISSA GRUHLER,
21 SCOTT GRUHLER,
22 LAURINE GUARINO,
23 RODNEY GUARINO,
24 SARAH HADDOX,
25 VERN HADDOX,
26 CATHY HANDA,
27 MADELINE HARLAND,
28 JOHN HARRINGTON,
MICHELLE HARRINGTON,
JOSEPH HARRIS,
PENNY HARTMAN,
WILLIE HARTMAN,
LARRY HARTMAN,
CHRISTIEL HARTMAN,
CHARLENE HATTON,
ROGER HATTON,
JAMES HEPLER,
FAYE HICKENBOTTOM,
JAMES HICKENBOTTOM,
BENSON HODGES,
MARK HODGETTS,
ROBIN HOLLIS,
DARLENE HOLTEL,
DAVID HOLTEL,
RONALD HOOD,
TERRI HORSTMAYER,
BRENDA HUDSON,
DARRELL HUDSON,
KENNETH HUMBLE,
CHRIS HUNTER,
KIMBERLY HURST,
CHRISTI IMBODEN,
ARTHUR INDIE JR,
MARK INGALLS,
AMERICAN CONSTRUCTION

1 HANDYMAN,
2 TYLER INGALLS,
3 EPHRAIM INGALS,
4 VERA HOFER-INGALS,
5 JEANETTE ISITT,
6 PATRICIA JOHNSON,
7 JASON JONES,
8 TIFFANY JONES,
9 KATHERINE JONES,
10 DENNIS JONES-RUSSO,
11 JACQUELINE JONES-RUSSO,
12 BRANDIE JORDAN,
13 THOMAS JUSTI,
14 JOAN KAFEL,
15 RUSSELL KAFEL,
16 SHANNON KASS,
17 JAYNE ACCETTA KAUFMAN,
18 ROBERT KAUFMAN,
19 GREG KELLER,
20 HARRIETTE KELLER,
21 BETTY KERBY,
22 JAMES KING,
23 TRINA KING,
24 CORINA KOUSEN,
25 KAREL KOUSEN,
26 CHRISTOPHER KUTRAS,
27 TERRI KUTRAS,
28 MARK LARRAMENDY,
RAMONA LARRAMENDY,
LARRY LARSON,
KIT LAUDERDALE,
RICHARD LAUDERDALE,
MICHAEL LAW,
GARLAND LEDBETTER,
PATRICIA J. LEDBETTER,
DIANA LEININGER,
SCOTT LEININGER,
BRENT LEMLER,
DONNA LEMLER,
RICKY LEMLER,
GRACE LEMON,
JUDY MCKAY-LIFQUIST,
ARTHUR LIFQUIST,
THEODORE LILLY,
LINDA LORENZ,
ANN LUKASZEWICZ,
PAUL LUKASZEWICZ,
DOUGLAS LUNSFORD,
JOSEPH LUNSFORD,
PHYLLIS LUNSFORD,
GLENN LYNCH,
HEATHER LYNCH,
DEANNA MAIER,
LARRY MAIER,
JENNIFER MANSFIELD,

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**SHERRIE MANSFIELD,
MAKAIYA MANSFIELD-HUNTER,
BENJAMIN MARTIN,
JERRY MARTIN,
JUDY MARTIN,
MADELINE MARTIN,
CRISPIN MARTINEZ,
ISAAC MARTINEZ,
MARIANNE MCALEER,
MICHELE MCCLASKEY,
SCOTT MCCLASKEY,
DOUGLAS MCDONALD,
LAURA MCHANEY,
DOUGLAS MCHANEY,
CINDY MCLAUGHLIN,
FRANLKIN MCLAUGHLIN,
MADELINE MILLER,
STEPHEN MILLER,
MATTHEW MITCHELL,
LYNSEY MITCHELL,
MARK MLCOCH,
FRANK MOJARRO,
JODI MONTOYA,
BARBARA MOORE,
LOUIS MOORE,
TIMOTHY MORELAND,
VALERIE MORELAND,
DIANE NAPOLI,
MICHAEL NAPOLI,
CORY NICKELL,
JORDAN NICKELL,
SUSAN NICKELL,
MIGUEL NUNEZ,
TODD O'CONNOR,
SALLY O'CONNOR,
MIKE OESTEREICH,
ROBERT OLSEN,
JOIE ORR,
JODI ORTIZ,
LOUIS ORTIZ,
JAMES OSTERDAY,
TRACY OSTERDAY,
PHILLIP OWEN,
REID OWEN,
JUSTIN PARKER,
JENNIE PEIKERT,
JOLAINA PELTIER,
LENORA PESSETTI,
MARILYN PETERS,
NICHOLAS PETERS,
LEE PLOTKIN,
LIZETTE POHLMAYER,
MATTHEW POHLMAYER,
TIMOTHY POLAND,
MICHAEL POWELL,**

1 TERESA POWELL,
ERNEST PRICE,
2 LAURA RATHE,
WAYNE RATHE,
3 CHERYL RENSHAW,
RANDALL RENSHAW,
4 BONNIE RHODES-MARTIN,
KENNETH RHODES,
5 TRAVIS RHODES,
JAMES RICH,
6 STELLA RICH,
LANCE RICHARDS,
7 RHONDA RICHARDS,
ALEJANDRO RIVERA,
8 NICOLE RIVERA,
CHARLES ROBERSON,
9 FRANCES ROBERTS,
CHRISTINA ROBINSON,
10 MICHAEL ROBINSON,
JEAN MARIE RUA,
11 LOW SAECHAO,
MELISSA SAECHAO,
12 DAVID SANDERSON,
SUSHMA SANGITA,
13 TIMOTHY SHARP,
JAIMIE SHARP,
14 JANET SHIRLEY,
GEORGE SHIRLEY,
15 JARED SMITH,
JENNIFER SMITH,
16 JODY SMITH,
REBECCA SMITH,
17 ROBERT SMITH,
SARAH SMITH,
18 MARIA SNYDER-DURAN,
PAUL SNYDER,
19 LAN SOKSODA-BENNETT,
GLORIA SPEIGLE,
20 CHRISTOPHER SPLIETHOF,
KENNETH SPLIETHOF,
21 KURTIS SPLIETHOF,
MARY SPLIETHOF,
22 SCOTT STANFIELD,
LARRY STAUP,
23 SHAWNA STAUP,
MARGARET STEDDOM,
24 CALLIE STERRETT,
RAND STERRETT,
25 LORI STILLIE,
KAREN STRAND,
26 STEVEN STRAND,
ALL ROOF COATINGS SEASONS,
27 TIM STROHMAYER,
TIMOTHY STUMPF,
28 WALTER SUTTON,

1 CARL TAYLOR,
2 FRANCES SUE TAYLOR,
3 IRON MOUNTAIN MANUFACTURING,
4 YASODA THIRUVOIPATI,
5 NANDAKUMAR THIRUVOIPATI,
6 ANTOINETTE TRIZUTO,
7 JEANNINE TRUJILLO,
8 JUAN TRUJILLO,
9 PELE TUPUOLOA,
10 THOM TURNER,
11 CLARK TUTHILL,
12 LOUISE TUTHILL,
13 MICHAEL VAUGHAN,
14 JOANN VAYO,
15 PAUL VAYO,
16 STEVEN WALKER,
17 WALKER WILLIAMS RANCH LLC,
18 JEFFREY WALSH,
19 KATHLEEN WALSH,
20 BRIAN WATTS,
21 BLAIR WATTS,
22 TERRI WEBB,
23 DONALD WERT,
24 PAMELA WERT,
25 NANCY WHITE,
26 LINDA WICKEL,
27 TRACY WILL,
28 STEPHEN WILL,
JOSEPH WILLIAMS,
KARI WILLIAMS,
DALE WOODS,
PEGGY WOODS,
RACHAL YARNALL,
ROGER YARNALL,
YARNALL CONSTRUCTION,
DARLENE YOST,
JACOB YOST,
LILLIAN YOST,
NICKOLAS YOST,
NANCY ZAWADA,
EDWARD ZAWADA,
RAY ZELLER,
THERESA ZELLER,
ED BLEDSOE, on behalf of himself and all
other legal heirs and successors in interest of
decedent, MELODY BLEDSOE; and
SHERRY BLEDSOE, on behalf of herself and
all other legal heirs and successors in interest
of Decedents, JAMES ARNOLD ROBERTS,
and EMILY LEANN ROBERTS;
TERRI WEBB, on behalf of herself and all
other legal heirs and successors in interest of
decedent, MICHAEL O'SHEA,

The aforementioned plaintiffs are suing

1 individually, on behalf of themselves, and on
2 behalf of all others similarly situated,

3 Plaintiffs,

4 vs.

5 STATE OF CALIFORNIA;
6 STATE OF CALIFORNIA, DEPARTMENT
7 OF TRANSPORTATION;
8 CITY OF REDDING; and
9 DOES 1 through 500, Inclusive

10 Defendants.

11 Plaintiffs, on behalf of themselves, and as representatives of others similarly
12 situated, allege as follows:

13 **INTRODUCTION**
14 **(As to All Causes of Action)**

15 1. Plaintiffs are informed and believe and thereon allege that, on or about July 23,
16 2018 at approximately 1:15 PM, a vegetation fire started on the shoulder of and within the right
17 of way of SR-299 near Carr Powerhouse Road, in the Whiskeytown National Recreation Area,
18 Shasta County, California, and spread throughout Shasta and Trinity counties, including the
19 City of Redding. Plaintiffs are informed and believe and thereon allege that the fire started due
20 to a disabled car igniting vegetation on the shoulder of and within the right-of-way of SR-299,
21 near Whiskeytown Lake, in the County of Shasta.

22 2. As a result of the Carr Fire, plaintiffs are informed and believe, and thereon
23 allege, that at least 1,079 residences, 22 commercial structures and 503 outbuildings were
24 destroyed, many within the City of Redding. Moreover, hundreds of additional residences,
25 commercial structures and outbuildings were damaged. Additionally, the Carr Fire destroyed or
26 damaged personal property of plaintiffs. Finally, many of the plaintiffs sustained emotional
27 damage, bodily injury or had loved ones who suffered fatal injuries as a result of the Carr Fire.
28 Those individuals who lost real or personal property or were injured or lost loved ones in the
Carr Fire are the class of plaintiffs for whom this Complaint is being brought.

///

THE PARTIES
(As to Defendants, State of California; State of California Department of Transportation; Does 1 through 250 ONLY)

3. As to defendants, State of California, State of California Department of Transportation, and Does 1 through 250: The Plaintiffs set forth below, bring this lawsuit on behalf of themselves, individually, and as representatives on behalf of those similarly situated, to wit: a) all owners of real property (both personal and business property) that was damaged or destroyed as a result of the Carr Fire; b) all owners of personal property (both business and personal property) that was damaged or destroyed as a result of the Carr Fire; and c) all persons who have claims for emotional damage, bodily injury or wrongful death as a result of the Carr Fire.

Plaintiffs as to Government Tort Claims filed on November 5, 2018 (original claim), November 14, 2018 (first amended claim), December 7, 2018 (second amended claim), and/or January 23, 2019 (third amended claim.)

4. At all relevant times herein, Plaintiff W. JAXON BAKER was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 812 Santa Cruz Drive, Redding, California 96003.

5. At all relevant times herein, Plaintiff KATE BAKER was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 812 Santa Cruz Drive, Redding, California 96003.

6. At all relevant times herein, Plaintiff JAROD ABRAHAM was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1050 Albion Avenue, Redding, California 96003.

7. At all relevant times herein, Plaintiff ROSEY ABRAHAM was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1050 Albion Avenue, Redding, California 96003.

8. At all relevant times herein, Plaintiff DONALD ADAMS was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1703 Ridge Drive, Redding, California, 96001.

1 9. At all relevant times herein, Plaintiff DEBORAH ADAMS was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 1703 Ridge Drive, Redding, California, 96001.

4 10. At all relevant times herein, Plaintiff DEBRA ALLEN was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 3474 Showboat Court, Redding, California 96003.

7 11. At all relevant times herein, Plaintiff CHRISTOPHER ALEXANDER was an
8 owner and/or occupant of real property and owner of personal property damaged by the Carr
9 Fire, located at 11052 Wingfield Lane, Shasta, California 96087.

10 12. At all relevant times herein, Plaintiff BARBARA ALEXANDER was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 11052 Wingfield Lane, Shasta, California 96087.

13 13. At all relevant times herein, Plaintiff RUTH ANGEL was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 15500 Bally View Lane, Redding, California 96001.

16 14. At all relevant times herein, Plaintiff ALBERT ANGEL was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15500 Bally View Lane, Redding, California 96001.

19 15. At all relevant times herein, Plaintiff TED AUKLAND was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 871 Santa Cruz Drive, Redding, California 96003.

22 16. At all relevant times herein, Plaintiff DEBHORA AUKLAND was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at 871 Santa Cruz Drive, Redding, California 96003.

25 17. At all relevant times herein, Plaintiff MICHAEL AUTORE was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 13651 Whiskeycreek Road, Whiskeytown, California 96095.

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18. At all relevant times herein, Plaintiff RALPH AUTORE was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 13651 Whiskeycreek Road, Whiskeytown, California 96095.

19. At all relevant times herein, Plaintiff CHARLOTTE KELLER BAILEY was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1339 River Ridge Drive, Redding, California 96003.

20. At all relevant times herein, Plaintiff THOMAS BIGDELY was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11433 Gold Brush Drive, Shasta, California 96087.

21. At all relevant times herein, Plaintiff JOSE BRIONES was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11151 Baker Rd., Redding, California 96003.

22. At all relevant times herein, Plaintiff LUIS BRIONES was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11151 Baker Rd., Redding, California 96003.

23. At all relevant times herein, Plaintiff BRUCE BROWN was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11398 Muletown Road, Space #24, Shasta, California 96087.

24. At all relevant times herein, Plaintiff ERIN BROWN was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 15270 Whispering Pines Drive, Shasta, California 96087.

25. At all relevant times herein, Plaintiff ROBERT BRUCE was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11310 Iron Mountain Road, Redding, California 96001.

26. At all relevant times herein, Plaintiff TODD BUCK was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1208 Yacht Court, Redding, California 96003.

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27. At all relevant times herein, Plaintiff AMPARO BUCK was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1208 Yacht Court, Redding, California 96003.

28. At all relevant times herein, Plaintiff NEIL CARL BUCHHOLZ was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 15581 Surprise Lane, Old Shasta, California 96087.

29. At all relevant times herein, Plaintiff LEANNE BERLINGHOFF was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 16290 Laurie Anne Lane, Redding, California, 96001.

30. At all relevant times herein, Plaintiff ROY BERLINGHOFF was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 16290 Laurie Anne Lane, Redding, California, 96001.

31. At all relevant times herein, Plaintiff ASHLEY BERLINGHOFF was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 16290 Laurie Anne Lane, Redding, California, 96001.

32. At all relevant times herein, Plaintiff AMBER BUSH was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1392 Ridge Drive, Redding, California 96001.

33. At all relevant times herein, Plaintiff JEFF CARMACK was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1372 Spinnaker Drive, Redding, California 96003.

34. At all relevant times herein, Plaintiff MICHELLE CARMACK was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1372 Spinnaker Drive, Redding, California 96003.

35. At all relevant times herein, Plaintiff PARVIN CARTER was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 859 Santa Cruz Drive, Redding, California 96001.

1 36. At all relevant times herein, Plaintiff MAX STANLEY CARTER was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 10119 Victoria Drive, Redding, California 96001.

4 37. At all relevant times herein, Plaintiff ALICE CARTER was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 10119 Victoria Drive, Redding, California 96001.

7 38. At all relevant times herein, Plaintiff KIM CATON was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 3530 First Cabin Court #3, Redding, California 96003.

10 39. At all relevant times herein, Plaintiff CHRISTOPHER CATON was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 3530 First Cabin Court #3, Redding, California 96003.

13 40. At all relevant times herein, Plaintiff JAMES CHARLTON was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 11260 Quartz Hill Road, Redding, California 96003.

16 41. At all relevant times herein, Plaintiff MARK CHITWOOD was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 4744 Ferrington Court, Redding, California 96003.

19 42. At all relevant times herein, Plaintiff MICHAEL COFFEY was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 990 Coggins Street, Redding, California 96003.

22 43. At all relevant times herein, Plaintiff BENJAMINA COFFEY was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at 990 Coggins Street, Redding, California 96003.

25 44. At all relevant times herein, Plaintiff COURTNEY COLUNGA was an owner
26 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
27 located at 957 Abion Avenue, Redding, California 96003.

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1 45. At all relevant times herein, Plaintiff STEPHEN CORTOPASSI was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 10123 Victoria Drive, Redding, California 96001.

4 46. At all relevant times herein, Plaintiff SUSAN CORTOPASSI was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 10123 Victoria Drive, Redding, California 96001.

7 47. At all relevant times herein, Plaintiff JAMES COWEE was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 16212 Laurie Anne Lane, Redding, California 96001.

10 48. At all relevant times herein, Plaintiff CAROL COWEE was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 16212 Laurie Anne Lane, Redding, California 96001.

13 49. At all relevant times herein, Plaintiff JONATHAN DAGG was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 827 Santa Cruz Drive, Redding, California 96003.

16 50. At all relevant times herein, Plaintiff SHARON DAGG was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 827 Santa Cruz Drive, Redding, California 96003.

19 51. At all relevant times herein, Plaintiff FLORA DAVIS was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 11460 Quartz Hill Road, Redding, California 96003.

22 52. At all relevant times herein, Plaintiff WILLIAM DAVIS was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 11460 Quartz Hill Road, Redding, California 96003.

25 53. At all relevant times herein, Plaintiff SHISHIR DHRUVA was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 3728 Sunflower Dr, Redding, California 96001.

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1 80. At all relevant times herein, Plaintiff LAURINE GUARINO was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 11177 Muletown Road, Shasta, California 96087.

4 81. At all relevant times herein, Plaintiff JOHN HARRINGTON was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 4723 Ferrington Ct, Redding, California 96003.

7 82. At all relevant times herein, Plaintiff MICHELLE HARRINGTON was an owner
8 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
9 located at 4723 Ferrington Ct, Redding, California 96003.

10 83. At all relevant times herein, Plaintiff JAMES HICKENBOTTOM was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 4795 Brincard Way, Redding, California 96003.

13 84. At all relevant times herein, Plaintiff FAYE HICKENBOTTOM was an owner
14 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
15 located at 4795 Brincard Way, Redding, California 96003.

16 85. At all relevant times herein, Plaintiff MARK HODGETTS was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, to wit a
18 Bulldozer.

19 86. At all relevant times herein, Plaintiff ROBIN HOLLIS was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 16921 Keswick Dam Road, Redding, California 96003.

22 87. At all relevant times herein, Plaintiff TERRI HORSTMAYER was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at 16097 Swift Fox Drive, Redding, California 96001.

25 88. At all relevant times herein, Plaintiff CHRISTOPHER HUNTER was an owner
26 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
27 located at 16265 Laurie Ann Lane, Redding, California 96001.

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1 54. At all relevant times herein, Plaintiff KALPANA DHURVA was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 3728 Sunflower Dr, Redding, California 96001.

4 55. At all relevant times herein, Plaintiff JUDY ECHELBERGER was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 16953 Cape Cod Dr., Redding, California 96003.

7 56. At all relevant times herein, Plaintiff SCOTT ELFORD was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 1336 River Ridge Drive, Redding, California 96003.

10 57. At all relevant times herein, Plaintiff THERESA ELFORD was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 1336 River Ridge Drive, Redding, California 96003.

13 58. At all relevant times herein, Plaintiff ROBERT ENGLE was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 864 Coggins Street, Redding, California 96003.

16 59. At all relevant times herein, Plaintiff ADELE ENGLE was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 864 Coggins Street, Redding, California 96003.

19 60. At all relevant times herein, Plaintiff PAUL EVANS was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 15926 Cindee Lane, Redding, California 96001.

22 61. At all relevant times herein, Plaintiff AMELIA EVANS was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 15926 Cindee Lane, Redding, California 96001.

25 62. At all relevant times herein, Plaintiff RICHARD FALLER was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 15901 Cindee Lane, Redding, California 96001.

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63. At all relevant times herein, Plaintiff DIVAN FARD was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 859 Santa Cruz Drive, Redding, California 96001.

64. At all relevant times herein, Plaintiff JOHN FELANDO was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 16086 Shasta Street, Redding, California 96001.

65. At all relevant times herein, Plaintiff MARIA GARCIA was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11151 Baker Rd., Redding, California 96003.

66. At all relevant times herein, Plaintiff ALEXANDER GAXIOLA was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 3459 Footbridge Court, Redding, California 96003.

67. At all relevant times herein, Plaintiff REBECCA GAXIOLA was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 3459 Footbridge Court, Redding, California 96003.

68. At all relevant times herein, Plaintiff STEPHEN GLASSBURN was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 8499 Zogg Mine Road, Igo, California 96047.

69. At all relevant times herein, Plaintiff RENEE GLASSBURN was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 8499 Zogg Mine Road, Igo, California 96047.

70. At all relevant times herein, Plaintiff DAVID GONZALES was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 15890 Cindee Lane, Redding, California 96001.

71. At all relevant times herein, Plaintiff ANGELA GONZALES was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 15890 Cindee Lane, Redding, California 96001.

1 72. At all relevant times herein, Plaintiff CHRISTIAN GONZALES was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 15361 Crocker Alley, Old Shasta, California, 96087.

4 73. At all relevant times herein, Plaintiff GONZALEZ 2005 TRUST was an owner of
5 real property damaged by the Carr Fire, located at 15034 Lamplight Drive, Old Shasta,
6 California, 96087; 15289 Lamplight Drive, Old Shasta, California 96087 and 15361 Crocker
7 Alley, Old Shasta, California 96087.

8 74. At all relevant times herein, Plaintiff JAMES GONZALEZ (owner of Gonzalez
9 2005 Trust) was an owner of real property damaged by the Carr Fire, located at 15034
10 Lamplight Drive, Old Shasta, California, 96087; 15289 Lamplight Drive, Old Shasta, California
11 96087 and 15361 Crocker Alley, Old Shasta, California 96087.

12 75. At all relevant times herein, Plaintiff LINDA GONZALEZ (owner of Gonzalez
13 2005 Trust) was an owner of real property damaged by the Carr Fire, located at 15034
14 Lamplight Drive, Old Shasta, California, 96087; 15289 Lamplight Drive, Old Shasta, California
15 96087 and 15361 Crocker Alley, Old Shasta, California 96087.

16 76. At all relevant times herein, Plaintiff JESSE GOMEZ was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 1313 River Ridge Dr., Redding, California 96003.

19 77. At all relevant times herein, Plaintiff MELISSA GRUHLER was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 1265 Coggins St., Redding, California 96003.

22 78. At all relevant times herein, Plaintiff SCOTT GRUHLER was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 1265 Coggins St., Redding, California 96003.

25 79. At all relevant times herein, Plaintiff RODNEY GUARINO was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 11177 Muletown Road, Shasta, California 96087.

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1 89. At all relevant times herein, Plaintiff KIMBERLY HURST was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 14841 Highway 299 West, Shasta, California 96087.

4 90. At all relevant times herein, Plaintiff AMERICAN HANDYMAN
5 CONSTRUCTION was a business located at 11333 Millie Street, Shasta, California 96087,
6 which provided handyman and construction services in and around Shasta County, which was
7 destroyed or damaged by the Carr Fire.

8 91. At all relevant times herein, Plaintiff MARK INGALLS was an owner and/or
9 occupant of real property and owner of personal property damaged by the Carr Fire, located at
10 11333 Millie Street, Shasta, California 96087, and was the owner or operator of AMERICAN
11 HANDYMAN CONSTRUCTION.

12 92. At all relevant times herein, Plaintiff TYLER INGALLS was an owner and/or
13 occupant of real property and owner of personal property damaged by the Carr Fire, located at
14 11333 Millie Street, Shasta, California 96087.

15 93. At all relevant times herein, Plaintiff PATRICIA JOHNSON was an owner and/or
16 occupant of real property and owner of personal property damaged by the Carr Fire, located at
17 15406 Trinity Mountain Road, French Gulch, California 96033.

18 94. At all relevant times herein, Plaintiff DENNIS JONES-RUSSO was an owner
19 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
20 located at 1189 Kellinger Street, Redding, California 96003.

21 95. At all relevant times herein, Plaintiff JACQUELINE JONES-RUSSO was an
22 owner and/or occupant of real property and owner of personal property damaged by the Carr
23 Fire, located at 1189 Kellinger Street, Redding, California 96003.

24 96. At all relevant times herein, Plaintiff TIFFANY JONES was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 16981 Catalina Way, Redding, California 96003.

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1 97. At all relevant times herein, Plaintiff JASON JONES was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 16981 Catalina Way, Redding, California 96003.

4 98. At all relevant times herein, Plaintiff RUSSELL KAFEL was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 983 Coggins Street, Redding, California 96003.

7 99. At all relevant times herein, Plaintiff JOAN KAFEL was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 983 Coggins Street, Redding, California 96003.

10 100. At all relevant times herein, Plaintiff GREG KELLER was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 9700 Thatcher Mill Road, Shingletown, California 96088.

13 101. At all relevant times herein, Plaintiff JAMES KING was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 15217 Mountain Shadow Drive, Redding, California 96001.

16 102. At all relevant times herein, Plaintiff TRINA KING was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15217 Mountain Shadow Drive, Redding, California 96001.

19 103. At all relevant times herein, Plaintiff LARRY LARSON was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 11398 Muletown Road, Shasta, California 96087.

22 104. At all relevant times herein, Plaintiff RICHARD LAUDERDALE was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at Trinity Mountain Road, Parcel Number 024-330-002-000.

25 105. At all relevant times herein, Plaintiff KIT LAUDERDALE was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 Trinity Mountain Road, Parcel Number 024-330-002-000.

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1 106. At all relevant times herein, Plaintiff ANN LUKASZEWICZ was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 13651 Whiskeycreek Road, Whiskeytown, California 96095.

4 107. At all relevant times herein, Plaintiff PAUL LUKASZEWICZ was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 13651 Whiskeycreek Road, Whiskeytown, California 96095.

7 108. At all relevant times herein, Plaintiff JENNIFER MANSFIELD was an owner
8 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
9 located at 16265 Laurie Ann Lane, Redding, California 96001.

10 109. At all relevant times herein, Plaintiff MAKAIYA MANSFIELD-HUNTER was
11 an owner and/or occupant of real property and owner of personal property damaged by the Carr
12 Fire, located at 16265 Laurie Ann Lane, Redding, California 96001.

13 110. At all relevant times herein, Plaintiff SHERRIE MANSFIELD-HUNTER was an
14 owner and/or occupant of real property and owner of personal property damaged by the Carr
15 Fire, located at 16265 Laurie Ann Lane, Redding, California 96001.

16 111. At all relevant times herein, Plaintiff JERRY MARTIN was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 1147 Coggins Street, Redding, California 96003.

19 112. At all relevant times herein, Plaintiff MADELINE MARTIN was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 1147 Coggins Street, Redding, California 96003.

22 113. At all relevant times herein, Plaintiff MARIANNE MCALEER was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at 15715 Highland Circle, Redding, California 96001.

25 114. At all relevant times herein, Plaintiff MARK MLCOCH was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 16097 Swift Fox Drive, Redding, California 96001.

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1 115. At all relevant times herein, Plaintiff LAURA MCHANEY was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 828 Santa Cruz Dr., Redding, California 96003.

4 116. At all relevant times herein, Plaintiff DOUGLAS MCDONALD was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 15078 Rock Creek Road, Shasta, California 96087.

7 117. At all relevant times herein, Plaintiff FRANKLIN MCLAUGHLIN was an owner
8 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
9 located at 11114 1/2 Salvation Flat Road, Redding, California 96001.

10 118. At all relevant times herein, Plaintiff CINDY MCLAUGHLIN was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 11114 1/2 Salvation Flat Road, Redding, California 96001.

13 119. At all relevant times herein, Plaintiff MATTHEW MITCHELL was an owner
14 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
15 located at 1051 Wildwood Lane, Redding, California 96001.

16 120. At all relevant times herein, Plaintiff LYNSEY MITCHELL was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 1051 Wildwood Lane, Redding, California 96001.

19 121. At all relevant times herein, Plaintiff VALERIE MORELAND was an owner
20 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
21 located at 15882 Lower Springs Road, Redding, California 96001.

22 122. At all relevant times herein, Plaintiff TIMOTHY MORELAND was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at 15882 Lower Springs Road, Redding, California 96001.

25 123. At all relevant times herein, Plaintiff CHRISTIAN MUNGUIA was an owner
26 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
27 located at 15698 Highland Circle, Redding, California 96001.

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1 124. At all relevant times herein, Plaintiff BREANNA MUNGUIA was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 15698 Highland Circle, Redding, California 96001.

4 125. At all relevant times herein, Plaintiff MICHAEL NAPOLI was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 3608 Steamboat Street, Redding, California 96003.

7 126. At all relevant times herein, Plaintiff DIANE NAPOLI was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 3608 Steamboat Street, Redding, California 96003.

10 127. At all relevant times herein, Plaintiff MIKE OESTEREICH was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 16921 Keswick Dam Road, Redding, California 96003.

13 128. At all relevant times herein, Plaintiff ROBERT OLSEN was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 11305 Menlo Way, Redding, California 96003.

16 129. At all relevant times herein, Plaintiff JAMES OSTERDAY was an owner and/or
17 occupant of personal property damaged by the Carr Fire, located at the Oak Bottom Marina in
18 Shasta County California, and who was a resident of the City of Redding, California.

19 130. At all relevant times herein, Plaintiff TRACY OSTERDAY was an owner of
20 personal property damaged by the Carr Fire, located at the Oak Bottom Marina in Shasta County
21 California, and who was a resident of the City of Redding, California.

22 131. At all relevant times herein, Plaintiff MARILYN PETERS was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 986 Albion Avenue, Redding, California 96003.

25 132. At all relevant times herein, Plaintiff NICHOLAS PETERS was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 986 Albion Avenue, Redding, California 96003.

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1 133. At all relevant times herein, Plaintiff LEE PLOTKIN was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 11455 Gold Rush Drive, Shasta, California 96087.

4 134. At all relevant times herein, Plaintiff MATTHEW POHLMAYER was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 1010 Albion Avenue, Redding, California 96003.

7 135. At all relevant times herein, Plaintiff LIZETTE POHLMAYER was an owner
8 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
9 located at 1010 Albion Avenue, Redding, California 96003.

10 136. At all relevant times herein, Plaintiff ERNEST PRICE was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 591 Turquoise Ct., Redding, California 96003.

13 137. At all relevant times herein, Plaintiff LARUA RATHE was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 8390 Potosi Road, Redding, California 96001.

16 138. At all relevant times herein, Plaintiff WAYNE RATHE was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 8390 Potosi Road, Redding, California 96001.

19 139. At all relevant times herein, Plaintiff RANDALL RENSHAW was an owner
20 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
21 located at 11042 Sugar Pine Lane #A, Shasta, California 96087.

22 140. At all relevant times herein, Plaintiff CHERYL RENSHAW was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 11042 Sugar Pine Lane #A, Shasta, California 96087.

25 141. At all relevant times herein, Plaintiff JAMES RICH was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 1132 Coggins Street, Redding, California 96003.

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1 142. At all relevant times herein, Plaintiff STELLA RICH was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 1132 Coggins Street, Redding, California 96003.

4 143. At all relevant times herein, Plaintiff KENNETH RHODES was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 4831 Ferrington Court, Redding, California 96003.

7 144. At all relevant times herein, Plaintiff FRANCES ROBERTS was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 910 Santa Cruz Dr., Redding, California 96003.

10 145. At all relevant times herein, Plaintiff MICHAEL ROBINSON was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 16678 Middle Creek Road, Redding, California 96001.

13 146. At all relevant times herein, Plaintiff CHRISTINA ROBINSON was an owner
14 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
15 located at 16678 Middle Creek Road, Redding, California 96001.

16 147. At all relevant times herein, Plaintiff SUSHMA SANGITA was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 824 Santa Cruz Dr., Redding, California 96003.

19 148. At all relevant times herein, Plaintiff TIMOTHY SHARP was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 1058 Coggins Street, Redding, California, 96003.

22 149. At all relevant times herein, Plaintiff JAIMIE SHARP was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 1058 Coggins Street, Redding, California, 96003.

25 150. At all relevant times herein, Plaintiff GEORGE SHIRLEY was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 3545 First Cabin Court, Redding, California 96003.

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1 151. At all relevant times herein, Plaintiff JANET SHIRLEY was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 3545 First Cabin Court, Redding, California 96003.

4 152. At all relevant times herein, Plaintiff ROBERT SMITH was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 1057 Coggins Street, Redding, California 96003.

7 153. At all relevant times herein, Plaintiff JODY SMITH was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 1057 Coggins Street, Redding, California 96003.

10 154. At all relevant times herein, Plaintiff SARAH SMITH was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 10745 French Alley Unit #3, Shasta, California 96087.

13 155. At all relevant times herein, Plaintiff SHAWNA STAUP was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 15211 Rock Creek Road, Shasta, California 96087.

16 156. At all relevant times herein, Plaintiff LARRY STAUP was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15211 Rock Creek Road, Shasta, California 96087.

19 157. At all relevant times herein, Plaintiff RAND STERRETT was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 1095 Albion Avenue, Redding, California, 96003.

22 158. At all relevant times herein, Plaintiff CALLIE STERRETT was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 1095 Albion Avenue, Redding, California, 96003.

25 159. At all relevant times herein, Plaintiff TIM STROHMAYER was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 973 Albion Avenue, Redding, California 96003.

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1 160. At all relevant times herein, Plaintiff THIRUVOIPATI NANDAKUMAR was an
2 owner and/or occupant of real property and owner of personal property damaged by the Carr
3 Fire, located at 824 Santa Cruz Dr., Redding, California 96003.

4 161. At all relevant times herein, Plaintiff YASODA THIRUVOIPATI was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 824 Santa Cruz Dr., Redding, California 96003.

7 162. At all relevant times herein, Plaintiff THOM TURNER was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 15830 Whispering Woods Trail, Redding, California 96001.

10 163. At all relevant times herein, Plaintiff MICHAEL VAUGHAN was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 11042 Sugar Pine Lane, Shasta, California 96087.

13 164. At all relevant times herein, Plaintiff PAUL VAYO was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 15217 Rock Creek Road, Shasta, California 96087.

16 165. At all relevant times herein, Plaintiff JO ANN VAYO was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15217 Rock Creek Road, Shasta, California 96087.

19 166. At all relevant times herein, Plaintiff STEVEN WALKER was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located in
21 Shasta County, to wit: Walker Williams Ranch, Gladstone Mine, Cline Gulch, in French Gulch,
22 California.

23 167. At all relevant times herein, Plaintiff WALKER WILLIAMS RANCH LLC was a
24 business located in Shasta County, which was destroyed or damaged by the Carr Fire. At all
25 relevant times, STEVEN WALKER was an owner or operator of WALKER WILLIAMS
26 RANCH LLC.

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1 168. At all relevant times herein, Plaintiff NANCY WHITE was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 15830 Whispering Woods Trail, Redding, California 96001.

4 169. At all relevant times herein, Plaintiff LINDA WICKEL was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 879 Santa Cruz Drive, Redding, California 96003.

7 170. At all relevant times herein, Plaintiff STEPHEN WILL was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 15661 Shasta Estates Drive, Redding, California 96001.

10 171. At all relevant times herein, Plaintiff TRACY WILL was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 15661 Shasta Estates Drive, Redding, California 96001.

13 172. At all relevant times herein, Plaintiff EDWARD ZAWADA was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 4660 Kilkee Drive, Redding, California 96001.

16 173. At all relevant times herein, Plaintiff NANCY ZAWADA was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 4660 Kilkee Drive, Redding, California 96001.

19 174. At all relevant times herein, Plaintiff ED BLEDSOE was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 11245 Quartz Hill Road, Redding, California 96003. Further, that, at all times pertinent hereto,
22 plaintiff ED BLEDSOE is the surviving spouse of MELODY BLEDSOE, deceased. Plaintiff is
23 the heir at law and successor in interest to MELODY BLEDSOE, deceased, and ED BLEDSOE
24 brings this lawsuit in that capacity. A Declaration as to Heir at Law and Successor in Interest
25 will be submitted concurrently herewith.

26 175. At all relevant times herein, Plaintiff SHERRY BLEDSOE was a resident of the
27 City of Redding, County of Shasta, State of California. Further, that, at all times pertinent
28 hereto, plaintiff SHERRY BLEDSOE is the surviving mother of JAMES ARNOLD ROBERTS

1 and EMILY LEANNE ROBERTS, deceased, who perished at a residence located at 11245
2 Quartz Hill Road, Redding, California 96003. Plaintiff is the heir at law and successor in interest
3 to JAMES ARNOLD ROBERTS and EMILY LEANNE ROBERTS, deceased, and SHERRY
4 BLEDSOE brings this lawsuit in that capacity. A Declaration as to Heir at Law and Successor in
5 Interest will be submitted concurrently herewith.

6 176. The above-referenced complied with all administrative claim requirements prior
7 to filing this Complaint. More specifically,

- 8 a. On November 2, 2018, plaintiffs (except for Ed and Sherry Bledsoe)
9 timely submitted their fully-executed "*Government Claims Form*" to
10 defendants STATE. (Copy available upon request).
- 11 b. On November 14, 2018, plaintiffs timely submitted their fully-executed
12 "*First Amended Government Claims Form*" to defendants STATE. (Copy
13 available upon request).
- 14 c. On December 7, 2018, plaintiffs timely submitted their fully-executed
15 "*Second Amended Government Claims Form*" to Defendant STATE. (Copy
16 available upon request).
- 17 d. On January 23, 2019, plaintiffs timely submitted their fully-executed
18 "*Third Amended Government Claims Form*" to Defendant STATE. A true
19 and correct copy of that fully-executed "*Third Amended Government Claims*
20 *Form*" is attached hereto as **Exhibit "A"** and incorporated herein by
21 reference.
- 22 e. Defendants STATE rejected the afore-mentioned claims on January 29,
23 2019. A true and correct copy of the rejection letters are attached hereto as
24 **Exhibit "B"** and incorporated herein by reference.
- 25 f. Additionally, on January 23, 2019, plaintiffs SHERRY BLEDSOE and
26 ED BLEDSOE timely submitted their fully-executed "*Second Amended*
27 *Government Claims Form*" to Defendant STATE. A true and correct copy
28 of that fully-executed "*Second Amended Government Claims Form*" is

1 attached hereto as **Exhibit “C”** and **Exhibit “D”**, respectively, and
2 incorporated herein by reference.

3 g. Defendants STATE rejected the SHERRY BLEDSOE and ED
4 BLEDSOE’s claims on February 25, 2019. A true and correct copy of the
5 rejection letters are attached hereto as **Exhibit “E”** and **Exhibit “F”** and
6 incorporated herein by reference.

7 h. Additionally, on January 18, 2019, STEVEN WALKER and WALKER
8 WILLIAMS RANCH LLC timely submitted their fully-executed
9 *Government Claims Form* to defendant STATE. The claim was rejected on
10 February 19, 2019. A true and correct copy of the Rejection Letter is
11 attached hereto as **Exhibit “O”**.

12 Plaintiffs for Government Tort Claims filed on February 8, 2019

13 177. On February 8, 2019, the following plaintiffs filed a Government Tort Claim and
14 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
15 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
16 presentation requirements on behalf of the following plaintiffs, and the late claim was not
17 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
18 not required for the inverse condemnation cause of action (Government Code section 905.1);
19 and 3) several of the claims against defendants only involve damage to property, which has a
20 one year statute of limitation (Government Code section 911.2) and the February 8, 2019, claim
21 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
22 upon request.

23 178. The STATE rejected the Application for Leave to Present Late Claim on May
24 15, 2019. A true and correct copy of the rejection letter is attached hereto as **Exhibit “G”** and
25 incorporated herein by reference. However, the STATE was silent as to the property claim, or
26 address plaintiffs’ arguments regarding inverse condemnation and the class claim aspect.
27 Therefore, plaintiffs believe that all claims were denied through this letter.

28 179. A Petition for Relief of the Late Claim Presentation Requirements will be filed,

1 again out of an excess of caution even though plaintiffs do not believe the late claim is required
2 for the reasons set forth in paragraph 177 above.

3 180. At all times pertinent hereto AMBER BOLLMANN was an owner and/or
4 occupant of real property and owner of personal property damaged by the Carr Fire, located at
5 1192 Coggins Street, Redding, California 96003.

6 181. At all times pertinent hereto TIMOTHY BOLLMANN was an owner and/or
7 occupant of real property and owner of personal property damaged by the Carr Fire, located at
8 1192 Coggins Street, Redding, California 96003.

9 182. At all times pertinent hereto SCOTT BREAR was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 333 Bedrock
11 Lane, Redding, California 96001.

12 183. At all times pertinent hereto WINSTON BROWN was an owner and/or occupant
13 of real property and owner of personal property damaged by the Carr Fire, located at 10996 Bud
14 Lane, Redding, California 96001 and 112890 Iron Mountain Road, Redding, California, 96001.

15 184. At all times pertinent hereto, petitioners MARIZ BROWN was an owner and/or
16 occupant of real property and owner of personal property damaged by the Carr Fire, located at
17 10996 Bud Lane, Redding, California 96001 and 112890 Iron Mountain Road, Redding,
18 California, 96001.

19 185. At all times pertinent hereto ALAN CRABTREE and the TRUST OF ALAN
20 CRABTREE was an owner and/or occupant of real property and owner of personal property
21 damaged by the Carr Fire, located at 11435 Market Street, Redding, California 96001 and 11449
22 Market Street, Redding, California 96001.

23 186. At all times pertinent hereto CATHERINE GOSIN was an owner and/or occupant
24 of real property and owner of personal property damaged by the Carr Fire, located at 15268
25 Ruggles Road, Shasta, California 96087.

26 187. At all times pertinent hereto ROBERT GOSIN was an owner and/or occupant of
27 real property and owner of personal property damaged by the Carr Fire, located at 15268
28 Ruggles Road, Shasta, California 96087.

1 188. At all times pertinent hereto JASON GOSIN was an owner and/or occupant of
2 real property and owner of personal property damaged by the Carr Fire, located at 15268
3 Ruggles Road, Shasta, California 96087.

4 189. At all times pertinent hereto RYAN GOSIN was an owner and/or occupant of real
5 property and owner of personal property damaged by the Carr Fire, located at 15268 Ruggles
6 Road, Shasta, California 96087.

7 190. At all times pertinent hereto CATHY HANDA was an owner and/or occupant of
8 real property and owner of personal property damaged by the Carr Fire, located at 8581 Zogg
9 Mine Road, Igo, California 96047.

10 191. At all times pertinent hereto HARRIETTE KELLER was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 15510 Red Bluff Road #7, Shasta, California 96087.

13 192. At all times pertinent hereto LINDA LORENZ was an owner and/or occupant of
14 real property and owner of personal property damaged by the Carr Fire, located at 333 Bedrock
15 Lane, Redding, California 96001.

16 193. At all times pertinent hereto DOUGLAS LUNSFORD was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 2985 Harlan Drive, Redding, California 96003.

19 194. At all times pertinent hereto PHYLLIS LUNSFORD was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 2985 Harlan Drive, Redding, California 96003.

22 195. At all times pertinent hereto CORY NICKELL was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 9810 Swasey
24 Drive, Redding, California 96001.

25 196. At all times pertinent hereto JORDAN NICKELL was an owner and/or occupant
26 of real property and owner of personal property damaged by the Carr Fire, located at 9810
27 Swasey Drive, Redding, California 96001.

28 197. At all times pertinent hereto SUSAN NICKELL was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 9810 Swasey
2 Drive, Redding, California 96001.

3 198. At all times pertinent hereto SALLY O'CONNOR was an owner and/or occupant
4 of real property and owner of personal property damaged by the Carr Fire, located at 10141
5 Sandy Lane, Redding, California 96001.

6 199. At all times pertinent hereto TODD O'CONNOR was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at 10141
8 Sandy Lane, Redding, California 96001.

9 200. At all times pertinent hereto LENORA PESSETTI was an owner and/or occupant
10 of real property and owner of personal property damaged by the Carr Fire, located at 11322 Iron
11 Mountain Road, Redding, California 96001.

12 201. At all times pertinent hereto LOW SAECHAO was an owner and/or occupant of
13 real property and owner of personal property damaged by the Carr Fire, located at 16105 Shasta
14 Street, Shasta, California 96087, and 11324 Menlo Way, Redding, California 96003.

15 202. At all times pertinent hereto MELISSA SAECHAO was an owner and/or
16 occupant of real property and owner of personal property damaged by the Carr Fire, located at
17 16105 Shasta Street, Shasta, California 96087, and 11324 Menlo Way, Redding, California
18 96003.

19 203. At all times pertinent hereto GLORIA SPEIGLE was an owner and/or occupant
20 of real property and owner of personal property damaged by the Carr Fire, located at 9976 Tilton
21 Mine Road, Redding, California 96001.

22 204. At all times pertinent hereto STEVE STRAND was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 11349 Puffin
24 Way, Redding, California 96003. Further, at all times pertinent hereto, plaintiff was the
25 owner/operator or had an interest in a business, ALL SEASONS ROOF COATINGS operating
26 under the laws of the State of California, with its principal place of business located at 11349
27 Puffin Way, Redding, California 96003.

28 205. At all times pertinent hereto KAREN STRAND was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 11349 Puffin
2 Way, Redding, California 96003. Further, at all times pertinent hereto, plaintiff was the
3 owner/operator or had an interest in a business, ALL SEASONS ROOF COATINGS operating
4 under the laws of the State of California, with its principal place of business located at 11349
5 Puffin Way, Redding, California 96003.

6 Plaintiffs for Government Tort Claims filed on February 22, 2019

7 206. On February 22, 2019, the following plaintiffs filed a Government Tort Claim
8 and Application for Leave to Present Late Claim with the STATE **out of an excess of caution**
9 **only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
10 presentation requirements on behalf of the following plaintiffs, and the late claim was not
11 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
12 not required for the inverse condemnation cause of action (Government Code section 905.1);
13 and 3) several of the claims against defendants only involve damage to property, which has a
14 one year statute of limitation (Government Code section 911.2) and the February 22, 2019,
15 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
16 available upon request.

17 207. The STATE has not yet acted on the Application for Leave to Present Late
18 Claim. As such, the claim and application for leave to present late claim were denied as a
19 matter of law on April 8, 2019. (See Government Code section 911.6). Additionally, the claims
20 filed before and after this claim were denied, as such, plaintiffs believe that this claim would
21 likewise have been denied.

22 208. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
23 again out of an excess of caution even though plaintiffs do not believe the late claim is required
24 for the reasons set forth in paragraph 206 above, should it be necessary.

25 209. At all times pertinent hereto ARNEL CASTELO was an owner and/or occupant
26 of real property and owner of personal property damaged by the Carr Fire, located at 10030
27 Chateau Woods Drive, Redding, California 96001.

28 210. At all times pertinent hereto LUCY CASTELO was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 10030
2 Chateau Woods Drive, Redding, California 96001.

3 211. At all times pertinent hereto ROBERT CHIARA was an owner and/or occupant
4 of real property and owner of personal property damaged by the Carr Fire, located at Mule Town
5 Road, Redding, California 96003.

6 212. At all times pertinent hereto DOLORES CHIARA was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at Mule Town
8 Road, Redding, California 96003.

9 213. At all times pertinent hereto MARIA SNYDER-DURAN was an owner and/or
10 occupant of real property and owner of personal property damaged by the Carr Fire, located at
11 3492 Grey Cape Ct, Redding, California 96003.

12 214. At all times pertinent hereto SANDRA DURAN was an owner and/or occupant of
13 real property and owner of personal property damaged by the Carr Fire, located at 3492 Grey
14 Cape Ct, Redding, California 96003.

15 215. At all times pertinent hereto NEIL ELIASSEN was an owner and/or occupant of
16 real property and owner of personal property damaged by the Carr Fire, located at 16156 Stone
17 Street, Redding, California 96001.

18 216. At all times pertinent hereto JEANIE ELIASSEN was an owner and/or occupant
19 of real property and owner of personal property damaged by the Carr Fire, located at 16156
20 Stone Street, Redding, California 96001.

21 217. At all times pertinent hereto JAYNE KAUFMAN was an owner and/or occupant
22 of real property and owner of personal property damaged by the Carr Fire, located at 10867
23 Trinity Alley, Shasta, California 96087.

24 218. At all times pertinent hereto ROBERT KAUFMAN was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 10867 Trinity Alley, Shasta, California 96087.

27 219. At all times pertinent hereto MARK LARRAMENDY was an owner and/or
28 occupant of real property and owner of personal property damaged by the Carr Fire, located at

1 12962 Cline Gulch Road, French Gulch, California 96033.

2 220. At all times pertinent hereto RAMONA LARRAMENDY was an owner and/or
3 occupant of real property and owner of personal property damaged by the Carr Fire, located at
4 12962 Cline Gulch Road, French Gulch, California 96033.

5 221. At all times pertinent hereto TERESA POWELL was an owner and/or occupant
6 of real property and owner of personal property damaged by the Carr Fire, located at 15952
7 Highland Drive, Redding, California 96001.

8 222. At all times pertinent hereto MICHAEL POWELL was an owner and/or occupant
9 of real property and owner of personal property damaged by the Carr Fire, located at 15952
10 Highland Drive, Redding, California 96001.

11 223. At all times pertinent hereto LANCE RICHARDS was an owner and/or occupant
12 of real property and owner of personal property damaged by the Carr Fire, located at 10722
13 McDonald Alley, Shasta, California 96087.

14 224. At all times pertinent hereto RHONDA RICHARDS was an owner and/or
15 occupant of real property and owner of personal property damaged by the Carr Fire, located at
16 10722 McDonald Alley, Shasta, California 96087.

17 225. At all times pertinent hereto MARGARET STEDDOM was an owner and/or
18 occupant of real property and owner of personal property damaged by the Carr Fire, located at
19 11398 Muletown Road #12, Shasta, California 96087

20 226. At all times pertinent hereto PAUL SNYDER was an owner and/or occupant of
21 real property and owner of personal property damaged by the Carr Fire, located at 3492 Grey
22 Cape Ct, Redding, California 96003.

23 Plaintiffs for Government Tort Claims filed on March 1, 2019

24 227. On March 1, 2019, the following plaintiffs filed a Government Tort Claim and
25 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
26 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
27 presentation requirements on behalf of the following plaintiffs, and the late claim was not
28 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is

1 not required for the inverse condemnation cause of action (Government Code section 905.1);
2 and 3) several of the claims against defendants only involve damage to property, which has a
3 one year statute of limitation (Government Code section 911.2) and the March 1, 2019, claim
4 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
5 upon request.

6 228. The STATE rejected the Application for Leave to Present Late Claim on May
7 13, 2019. A true and correct copy of the rejection letter is attached hereto as **Exhibit "H"** and
8 incorporated herein by reference. However, the STATE was silent as to the property claim, or
9 address plaintiffs' arguments regarding inverse condemnation and the class claim aspect.
10 Therefore, plaintiffs believe that all claims were denied through this letter.

11 229. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
12 again out of an excess of caution even though plaintiffs do not believe the late claim is required
13 for the reasons set forth in paragraph 227 above, should it be necessary.

14 230. At all times pertinent hereto WILLIAM BROWN was an owner and/or occupant
15 of real property and owner of personal property damaged by the Carr Fire, located at 16035
16 High Street, Redding, California 96001.

17 231. At all times pertinent hereto TERRY BRUSHETT was an owner and/or occupant
18 of real property and owner of personal property damaged by the Carr Fire, located at 15844
19 Briarwood Drive, Redding, California 96001; and 15488 Nova Lane, Shasta, California 96087.

20 232. At all times pertinent hereto STEVE CAMERON was an owner and/or occupant
21 of real property and owner of personal property damaged by the Carr Fire, located at 10604
22 High Street and 10604 High Street, Old Shasta, California 96087.

23 233. At all times pertinent hereto KIM CAMERON was an owner and/or occupant of
24 real property and owner of personal property damaged by the Carr Fire, located at 10604 High
25 Street and 10604 High Street, Old Shasta, California 96087.

26 234. At all times pertinent hereto GARY EDWARDS was an owner and/or occupant
27 of real property and owner of personal property damaged by the Carr Fire, located at 16553
28 Middle Creek Road, Redding, California 96001.

1 235. At all times pertinent hereto PEGGY EDWARDS was an owner and/or occupant
2 of real property and owner of personal property damaged by the Carr Fire, located at 16553
3 Middle Creek Road, Redding, California 96001.

4 236. At all times pertinent hereto BERNEICE EVEREST was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 16327 North Street, Redding, California 96003.

7 237. At all times pertinent hereto GLEN EVEREST was an owner and/or occupant of
8 real property and owner of personal property damaged by the Carr Fire, located at 16327 North
9 Street, Redding, California 96003.

10 238. At all times pertinent hereto JOHN EVERETT III, DO was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 846 Leisha Lane, Redding, California 96001.

13 239. At all times pertinent hereto JENNIFER EVERETT was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 846 Leisha Lane, Redding, California 96001.

16 240. At all times pertinent hereto MARCI FERNANDES was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15888 Rock Creek Road, Redding, California 96001.

19 241. At all times pertinent hereto SARAH HADDOX was an owner and/or occupant of
20 real property and owner of personal property damaged by the Carr Fire, located at 15662 Mule
21 Mountain Parkway, Redding, California 96001.

22 242. At all times pertinent hereto VERN HADDOX was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 15662 Mule
24 Mountain Parkway, Redding, California 96001.

25 243. At all times pertinent hereto CHARLENE HATTON was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 4469 Eureka Way, / 299 W, Redding, California 96001.

28 244. At all times pertinent hereto ROGER HATTON was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 4469 Eureka
2 Way, / 299 W, Redding, California 96001.

3 245. At all times pertinent hereto KENNETH HUMBLE was an owner and/or
4 occupant of real property and owner of personal property damaged by the Carr Fire, located
5 approximately 1 Mile Up Grizzly Gulch, Whiskeytown, California 96095.

6 246. At all times pertinent hereto CHRISTI IMBODEN was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at 16164
8 Bush Street, Redding, California 96001.

9 247. At all times pertinent hereto JANET LANDLES was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 11569 Hwy
11 299 W, French Gulch, California 96033.

12 248. At all times pertinent hereto HEATHER LYNCH was an owner and/or occupant
13 of real property and owner of personal property damaged by the Carr Fire, located at 15317
14 McComb Hill Road, Shasta, California 96087.

15 249. At all times pertinent hereto GLENN LYNCH was an owner and/or occupant of
16 real property and owner of personal property damaged by the Carr Fire, located at 15317
17 McComb Hill Road, Shasta, California 96087.

18 250. At all times pertinent hereto FRANK MOJARRO was an owner and/or occupant
19 of real property and owner of personal property damaged by the Carr Fire, located at 280
20 Moonstone Way, Redding, California 96003.

21 251. At all times pertinent hereto ALEJANDRO RIVERA was an owner and/or
22 occupant of real property and owner of personal property damaged by the Carr Fire, located at
23 16937 Cape Code Drive, Redding, California 96003.

24 252. At all times pertinent hereto NICOLE RIVERA was an owner and/or occupant of
25 real property and owner of personal property damaged by the Carr Fire, located at 16937 Cape
26 Code Drive, Redding, California 96003.

27 253. At all times pertinent hereto JEAN MARIE RUA was an owner and/or occupant
28 of real property and owner of personal property damaged by the Carr Fire, located at 15844

1 Briarwood Drive, Redding, California 96001; and 15488 Nova Lane, Shasta, California 96087.

2 254. At all times pertinent hereto SARAH SMITH was an owner and/or occupant of
3 real property and owner of personal property damaged by the Carr Fire, located at 10745 French
4 Gulch Alley #3, Shasta, California 96087.

5 255. At all times pertinent hereto SCOTT STANFIELD was an owner and/or occupant
6 of real property and owner of personal property damaged by the Carr Fire, located at 16019
7 Sacramento Street, Redding, California 96001.

8 256. At all times pertinent hereto CARL TAYLOR was an owner and/or occupant of
9 real property and owner of personal property damaged by the Carr Fire, located at 10565 Iron
10 Mountain Road, Redding, California 96001.

11 257. At all times pertinent hereto FRANCES SUE TAYLOR was an owner and/or
12 occupant of real property and owner of personal property damaged by the Carr Fire, located at
13 10565 Iron Mountain Road, Redding, California 96001. Additionally, at all times pertinent
14 hereto, FRANCES SUE TAYLOR and CARL TAYLOR were the owners and/or operators of
15 IRON MOUNTAIN MANUFACTURING which was destroyed in the fire.

16 Plaintiffs for Government Tort Claims filed on March 8, 2019

17 258. On March 8, 2019, the following plaintiffs filed a Government Tort Claim and
18 Application for Leave to Present Late Claim with the STATE out of an excess of caution only
19 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
20 presentation requirements on behalf of the following plaintiffs, and the late claim was not
21 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
22 not required for the inverse condemnation cause of action (Government Code section 905.1);
23 and 3) several of the claims against defendants only involve damage to property, which has a
24 one year statute of limitation (Government Code section 911.2) and the March 8, 2019, claim
25 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
26 upon request.

27 259. The STATE has not yet acted on the Application for Leave to Present Late
28 Claim. As such, the claim and application for leave to present late claim were denied as a

1 matter of law on April 22, 2019. (See Government Code section 911.6). Additionally, the
2 claims filed before and after this claim were denied, as such, plaintiffs believe that this claim
3 would likewise have been denied.

4 260. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
5 again out of an excess of caution even though plaintiffs do not believe the late claim is required
6 for the reasons set forth in paragraph 258 above.

7 261. At all times pertinent hereto DENNIS ALFARO was an owner and/or occupant
8 of real property and owner of personal property damaged by the Carr Fire, located at 892
9 Coggins Street, Redding, California 96003.

10 262. At all times pertinent hereto RUSSELL BROWN was an owner and/or occupant
11 of real property and owner of personal property damaged by the Carr Fire, located at 11335
12 George Street, Redding, California 96001.

13 263. At all times pertinent hereto MICHAEL BRUSHETT was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 11050 Stardust Lane, Shasta, California 96087.

16 264. At all times pertinent hereto TRISA CHAPARRO was an owner and/or occupant
17 of real property and owner of personal property damaged by the Carr Fire, located at 11571
18 Weiland Street, Redding, California 96001.

19 265. At all times pertinent hereto ADAM DAHL was an owner and/or occupant of
20 real property and owner of personal property damaged by the Carr Fire, located at 15936
21 Cindee Lane, Redding, California 96001.

22 266. At all times pertinent hereto ALICIA DAHL was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 15936
24 Cindee Lane, Redding, California 96001.

25 267. At all times pertinent hereto MADELINE HARLAND was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 10126 Sandy Lane, Redding, California 96001.

28 268. At all times pertinent hereto THOMAS JUSTI was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 10717
2 Second Street, Shasta, California 96087.

3 269. At all times pertinent hereto SHANNON KASS was an owner and/or occupant
4 of real property and owner of personal property damaged by the Carr Fire, located at 11308
5 Iron Mountain Road, Redding, California 96001.

6 270. At all times pertinent hereto BENJAMIN MARTIN was an owner and/or
7 occupant of real property and owner of personal property damaged by the Carr Fire, located at
8 11636 Market Street, Redding, California 96001; 11625 Market Street, Redding, California
9 96001; 11616 Market Street, Redding, California 96001; and 11612 Market Street, Redding,
10 California 96001.

11 271. At all times pertinent hereto JUDY MARTIN was an owner and/or occupant of
12 real property and owner of personal property damaged by the Carr Fire, located at 11636
13 Market Street, Redding, California 96001; 11625 Market Street, Redding, California 96001;
14 11616 Market Street, Redding, California 96001; and 11612 Market Street, Redding, California
15 96001.

16 272. At all times pertinent hereto JODI ORTIZ was an owner and/or occupant of real
17 property and owner of personal property damaged by the Carr Fire, located at 10722 McDonald
18 Alley, Shasta, California 96087, and 10740 McDonald Alley, Shasta, California 96087.

19 273. At all times pertinent hereto JUSTIN PARKER was an owner and/or occupant of
20 real property and owner of personal property damaged by the Carr Fire, located at 11571
21 Weiland Street, Redding, California 96001.

22 274. At all times pertinent hereto LORI STILLIE was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 1421
24 Spinnaker Drive, Redding, California 96002.

25 275. At all times pertinent hereto ANTOINETTE TRIZUTO was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 1284 Diamond Bar Ct., Redding, California 96003.

28 276. At all times pertinent hereto JEANNINE TRUJILLO was an owner and/or

1 occupant of real property and owner of personal property damaged by the Carr Fire, located at
2 15417 Papas Road, Shasta, California 96087.

3 277. At all times pertinent hereto JUAN TRUJILLO was an owner and/or occupant of
4 real property and owner of personal property damaged by the Carr Fire, located at 15417 Papas
5 Road, Shasta, California 96087.

6 278. At all times pertinent hereto DONALD WERT was an owner and/or occupant of
7 real property and owner of personal property damaged by the Carr Fire, located at 11333 Puffin
8 Way, Redding, California 96003.

9 279. At all times pertinent hereto PAMELA WERT was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 11333 Puffin
11 Way, Redding, California 96003.

12 280. At all times pertinent hereto JOSEPH WILLIAMS was an owner and/or
13 occupant of real property and owner of personal property damaged by the Carr Fire, located at
14 11561 Market St. Redding, California 96001.

15 Plaintiffs for Government Tort Claims filed on March 15, 2019

16 281. On March 8, 2019, the following plaintiffs filed a Government Tort Claim and
17 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
18 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
19 presentation requirements on behalf of the following plaintiffs, and the late claim was not
20 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
21 not required for the inverse condemnation cause of action (Government Code section 905.1);
22 and 3) several of the claims against defendants only involve damage to property, which has a
23 one year statute of limitation (Government Code section 911.2) and the March 8, 2019, claim
24 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
25 upon request.

26 282. The STATE has not yet acted on the Application for Leave to Present Late
27 Claim. As such, the claim and application for leave to present late claim were denied as a
28 matter of law on April 29, 2019. (See Government Code section 911.6). Additionally, the

1 claims filed before and after this claim were denied, as such, plaintiffs believe that this claim
2 would likewise have been denied.

3 283. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
4 again out of an excess of caution even though plaintiffs do not believe the late claim is required
5 for the reasons set forth in paragraph 281 above.

6 284. At all times pertinent hereto MAILE ALFARO was an owner and/or occupant of
7 real property and owner of personal property damaged by the Carr Fire, located at 892 Coggins
8 Street, Redding, California 96003.

9 285. At all times pertinent hereto JULIE CHRISTIE was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 10572 High
11 Street, Shasta, California 96087.

12 286. At all times pertinent hereto NEIL CHRISTIE was an owner and/or occupant of
13 real property and owner of personal property damaged by the Carr Fire, located at 10572 High
14 Street, Shasta, California 96087.

15 287. At all times pertinent hereto VICTORIA DOTY was an owner and/or occupant
16 of real property and owner of personal property damaged by the Carr Fire, located at 15380
17 Buell Alley, Shasta, California 96087.

18 288. At all times pertinent hereto DEANNA MAIER was an owner and/or occupant
19 of real property and owner of personal property damaged by the Carr Fire, located at 9714
20 Swasey Drive, Redding, California 96001.

21 289. At all times pertinent hereto LARRY MAIER was an owner and/or occupant of
22 real property and owner of personal property damaged by the Carr Fire, located at 9714 Swasey
23 Drive, Redding, California 96001.

24 290. At all times pertinent hereto TIMOTHY STUMPF was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 15707 Swasey Mine Lane, Redding, California 96001.

27 291. At all times pertinent hereto KARI WILLIAMS was an owner and/or occupant
28 of real property and owner of personal property damaged by the Carr Fire, located at 11561

1 Market Street, Redding, California 96001.

2 Plaintiffs for Government Tort Claims filed on March 25, 2019

3 292. On March 25, 2019, the following plaintiffs filed a Government Tort Claim and
4 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
5 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
6 presentation requirements on behalf of the following plaintiffs, and the late claim was not
7 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
8 not required for the inverse condemnation cause of action (Government Code section 905.1);
9 and 3) several of the claims against defendants only involve damage to property, which has a
10 one year statute of limitation (Government Code section 911.2) and the March 25, 2019, claim
11 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
12 upon request.

13 293. The STATE rejected the Application for Leave to Present Late Claim on May
14 13, 2019. A true and correct copy of the rejection letter is attached hereto as **Exhibit "I"** and
15 incorporated herein by reference. However, the STATE was silent as to the property claim, or
16 address plaintiffs' arguments regarding inverse condemnation and the class claim aspect.
17 Therefore, plaintiffs believe that all claims were denied through this letter.

18 294. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
19 again out of an excess of caution even though plaintiffs do not believe the late claim is required
20 for the reasons set forth in paragraph 292 above.

21 295. At all times pertinent hereto JESUS BARRIOS was an owner and/or occupant of
22 real property and owner of personal property damaged by the Carr Fire, located at 17075
23 Wagon Drive, Redding, California 96003.

24 296. At all times pertinent hereto JENNIFER BUTLER was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 11322 Iron Mountain Road, Redding, California 96001.

27 297. At all times pertinent hereto ROBERT COTTRELL was an owner and/or
28 occupant of real property and owner of personal property damaged by the Carr Fire, located at

1 11308 Iron Mountain Road, Shasta, California 96087.

2 298. At all times pertinent hereto ROBERT EILER was an owner and/or occupant of
3 real property and owner of personal property damaged by the Carr Fire, located at 9941 Tilton
4 Mine Road, Redding, California 96001.

5 299. At all times pertinent hereto RONALD HOOD was an owner and/or occupant of
6 real property and owner of personal property damaged by the Carr Fire, located at 11455
7 California Street, Redding, California 96001.

8 300. At all times pertinent hereto BRENDA HUDSON was an owner and/or occupant
9 of real property and owner of personal property damaged by the Carr Fire, located at 11371
10 Menlo Way, Redding, California 96003.

11 301. At all times pertinent hereto DARRELL HUDSON was an owner and/or
12 occupant of real property and owner of personal property damaged by the Carr Fire, located at
13 11371 Menlo Way, Redding, California 96003.

14 302. At all times pertinent hereto EPHRAIM INGALS was an owner and/or occupant
15 of real property and owner of personal property damaged by the Carr Fire, located at 448
16 Turquoise Court, Redding, California 96003.

17 303. At all times pertinent hereto VERA INGALS was an owner and/or occupant of
18 real property and owner of personal property damaged by the Carr Fire, located at 448
19 Turquoise Court, Redding, California 96003.

20 304. At all times pertinent hereto JEANETTE ISITT was an owner and/or occupant
21 of real property and owner of personal property damaged by the Carr Fire, located at 15317
22 McComb Hill Road, Shasta, California 96087.

23 305. At all times pertinent hereto CRISPIN MARTINEZ was an owner and/or
24 occupant of real property and owner of personal property damaged by the Carr Fire, located at
25 16917 Spring Creek Road, Redding, California 96003.

26 306. At all times pertinent hereto ISAAC MARTINEZ was an owner and/or occupant
27 of real property and owner of personal property damaged by the Carr Fire, located at 16917
28 Spring Creek Road, Redding, California 96003.

1 307. At all times pertinent hereto JODI MONTOYA was an owner and/or occupant of
2 real property and owner of personal property damaged by the Carr Fire, located at 9941 Tilton
3 Mine Road, Redding, California 96001.

4 Plaintiffs for Government Tort Claims filed on April 1, 2019

5 308. On April 1, 2019, the following plaintiffs filed a Government Tort Claim and
6 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
7 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
8 presentation requirements on behalf of the following plaintiffs, and the late claim was not
9 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
10 not required for the inverse condemnation cause of action (Government Code section 905.1);
11 and 3) several of the claims against defendants only involve damage to property, which has a
12 one year statute of limitation (Government Code section 911.2) and the April 1, 2019, claim
13 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
14 upon request.

15 309. The STATE rejected the Application for Leave to Present Late Claim on May
16 16, 2019. A true and correct copy of the rejection letter is attached hereto as **Exhibit “J”** and
17 incorporated herein by reference. However, the STATE was silent as to the property claim, or
18 address plaintiffs’ arguments regarding inverse condemnation and the class claim aspect.
19 Therefore, plaintiffs believe that all claims were denied through this letter.

20 310. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
21 again out of an excess of caution even though plaintiffs do not believe the late claim is required
22 for the reasons set forth in paragraph 308 above.

23 311. At all times pertinent hereto CHRISTIEL HARTMAN was an owner and/or
24 occupant of real property and owner of personal property damaged by the Carr Fire, located at
25 17075 Wagon Drive, Redding, California 96003.

26 312. At all times pertinent hereto TINA CORONA was an owner and/or occupant of
27 real property and owner of personal property damaged by the Carr Fire, located at 420
28 Turquoise Court, Redding, California 96003.

1 313. At all times pertinent hereto JESUS CORONA was an owner and/or occupant of
2 real property and owner of personal property damaged by the Carr Fire, located at 420
3 Turquoise Court, Redding, California 96003.

4 314. At all times pertinent hereto SUSUIN DEAN was an owner and/or occupant of
5 real property and owner of personal property damaged by the Carr Fire, located at 15980 Lower
6 Springs Road, Redding, California 96001.

7 315. At all times pertinent hereto JOSEPH HARRIS was an owner and/or occupant of
8 real property and owner of personal property damaged by the Carr Fire, located at 15980 Lower
9 Springs Road, Redding, California 96001.

10 316. At all times pertinent hereto CHRISTOPHER KUTRAS was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 890 Sunriver Lane, Redding, California 96001, and Kutras ranch, Trinity Mountain Road.

13 317. At all times pertinent hereto TERRI KUTRAS was an owner and/or occupant of
14 real property and owner of personal property damaged by the Carr Fire, located at 890 Sunriver
15 Lane, Redding, California 96001, and Kutras ranch, Trinity Mountain Road.

16 318. At all times pertinent hereto MICHELE MCCLASKEY was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15786 Rock Creek Road, Redding, California 96001.

19 319. At all times pertinent hereto SCOTT MCCLASKEY was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 15786 Rock Creek Road, Redding, California 96001.

22 320. At all times pertinent hereto JARED SMITH was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 15115
24 Middletown Park Dr., Redding, California 96001.

25 321. At all times pertinent hereto JENNIFER SMITH was an owner and/or occupant
26 of real property and owner of personal property damaged by the Carr Fire, located at 15115
27 Middletown Park Dr., Redding, California 96001.

28 322. At all times pertinent hereto BLAIR WATTS was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 16182 Bush
2 Street, Redding, California 96001.

3 Plaintiffs for Government Tort Claims filed on April 8, 2019

4 323. On April 8, 2019, the following plaintiffs filed a Government Tort Claim and
5 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
6 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
7 presentation requirements on behalf of the following plaintiffs, and the late claim was not
8 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
9 not required for the inverse condemnation cause of action (Government Code section 905.1);
10 and 3) several of the claims against defendants only involve damage to property, which has a
11 one year statute of limitation (Government Code section 911.2) and the April 8, 2019, claim
12 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
13 upon request.

14 324. The STATE rejected the Application for Leave to Present Late Claim on May
15 16, 2019. A true and correct copy of the rejection letter is attached hereto as **Exhibit “K”** and
16 incorporated herein by reference. However, the STATE was silent as to the property claim, or
17 address plaintiffs’ arguments regarding inverse condemnation and the class claim aspect.
18 Therefore, plaintiffs believe that all claims were denied through this letter.

19 325. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
20 again out of an excess of caution even though plaintiffs do not believe the late claim is required
21 for the reasons set forth in paragraph 323 above.

22 326. At all times pertinent hereto JOE BAKER was an owner and/or occupant of real
23 property and owner of personal property damaged by the Carr Fire, located at 15515 Ballyview
24 Lane, Redding, California 96001.

25 327. At all times pertinent hereto SHAUNA BAKER was an owner and/or occupant
26 of real property and owner of personal property damaged by the Carr Fire, located at 15515
27 Ballyview Lane, Redding, California 96001.

28 328. At all times pertinent hereto KIP BLANKENHEIM was an owner and/or

1 occupant of real property and owner of personal property damaged by the Carr Fire, located at
2 10786 McDonald Alley, Shasta, California 96087.

3 329. At all times pertinent hereto MELVIN BLANKENHEIM was an owner and/or
4 occupant of real property and owner of personal property damaged by the Carr Fire, located at
5 10786 McDonald Alley, Shasta, California 96087.

6 330. At all times pertinent hereto TED BLANKENHEIM was an owner and/or
7 occupant of real property and owner of personal property damaged by the Carr Fire, located at
8 15188 Nova Lane, Shasta, California 96087.

9 331. At all times pertinent hereto DAVID DUMALSKI was an owner and/or
10 occupant of real property and owner of personal property damaged by the Carr Fire, located at
11 11390 Muletown Road, Shasta, California 96087, and 11398 Muletown Road, Shasta,
12 California 96087.

13 332. At all times pertinent hereto MICHELE DUMALSKI was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 11390 Muletown Road, Shasta, California 96087, and 11398 Muletown Road, Shasta,
16 California 96087.

17 333. At all times pertinent hereto MARVIN GRIM was an owner and/or occupant of
18 real property and owner of personal property damaged by the Carr Fire, located 16135 Stone
19 Street, Redding, California 96001.

20 334. At all times pertinent hereto MONICA GRIM was an owner and/or occupant of
21 real property and owner of personal property damaged by the Carr Fire, located 16135 Stone
22 Street, Redding, California 96001.

23 335. At all times pertinent hereto LARRY HARTMAN was an owner and/or occupant
24 of real property and owner of personal property damaged by the Carr Fire, located at 17103
25 Wagon Drive, Redding, California 96003.

26 336. At all times pertinent hereto PENNY HARTMAN was an owner and/or occupant
27 of real property and owner of personal property damaged by the Carr Fire, located at 17085
28 Wagon Drive, Redding, California 96003.

1 337. At all times pertinent hereto WILLIE HARTMAN was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 17103 Wagon Drive, Redding, California 96003.

4 338. At all times pertinent hereto BRANDIE JORDAN was an owner and/or occupant
5 of real property and owner of personal property damaged by the Carr Fire, located at 16107
6 Cagle Lane, Redding, California 96001.

7 339. At all times pertinent hereto JOIE ORR was an owner and/or occupant of real
8 property and owner of personal property damaged by the Carr Fire, 11588 Market Street,
9 Redding, California 96001.

10 340. At all times pertinent hereto CHARLES ROBERSON was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, 11519
12 California Street, Redding, California 96001.

13 341. At all times pertinent hereto DAVID SANDERSON was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 17085 Wagon Drive, Redding, California 96003.

16 342. At all times pertinent hereto KURTIS SPLIETHOF was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 16107 Cagle Lane, Redding, California 96001.

19 343. At all times pertinent hereto WALTER SUTTON was an owner and/or occupant
20 of real property and owner of personal property damaged by the Carr Fire, located at 11519
21 California Street, Redding, California 96001.

22 344. At all times pertinent hereto CLARK TUTHILL was an owner and/or occupant
23 of real property and owner of personal property damaged by the Carr Fire, located at 10150
24 Tilton Mine Road, Redding, California 96001.

25 345. At all times pertinent hereto LOUISE TUTHILL was an owner and/or occupant
26 of real property and owner of personal property damaged by the Carr Fire, located at 10150
27 Tilton Mine Road, Redding, California 96001.

28 346. At all times pertinent hereto DALE WOODS was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 16212
2 Sanders Lane, Redding, California 96001 and 11655 Market Street, Redding, California 96001.

3 347. At all times pertinent hereto PEGGY WOODS was an owner and/or occupant of
4 real property and owner of personal property damaged by the Carr Fire, located at 16212
5 Sanders Lane, Redding, California 96001 and 11655 Market Street, Redding, California 96001.

6 348. At all times pertinent hereto DARLENE YOST was an owner and/or occupant of
7 real property and owner of personal property damaged by the Carr Fire, located at 11588
8 Market Street, Redding, California 96001.

9 349. At all times pertinent hereto JACOB YOST was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 11588
11 Market Street, Redding, California 96001.

12 Plaintiffs for Government Tort Claims filed on April 29, 2019

13 350. On April 29, 2019, the following plaintiffs filed a Government Tort Claim and
14 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
15 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
16 presentation requirements on behalf of the following plaintiffs, and the late claim was not
17 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
18 not required for the inverse condemnation cause of action (Government Code section 905.1);
19 and 3) several of the claims against defendants only involve damage to property, which has a
20 one year statute of limitation (Government Code section 911.2) and the April 29, 2019, claim
21 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
22 upon request.

23 351. The time has not yet expired for the STATE to accept or reject the claim /
24 Application for Leave to Present Late Claim. However, based on the previous denials in this
25 case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
26 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
27 arise, and this Complaint will be amended once the late claim is denied to include the operative
28 denial date.

1 352. At all times pertinent hereto ANGELA BEARD was an owner and/or occupant
2 of real property and owner of personal property damaged by the Carr Fire, located at 1005
3 Albion Ave, Redding, California, 96003.

4 353. At all times pertinent hereto JAMES BEARD was an owner and/or occupant of
5 real property and owner of personal property damaged by the Carr Fire, located at 1005 Albion
6 Ave, Redding, California, 96003.

7 354. At all times pertinent hereto DARRELL BENNEAU was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 16138 Sanders Lane, Redding, California, 96001.

10 355. At all times pertinent hereto LEE BRUSHETT was an owner and/or occupant of
11 real property and owner of personal property damaged by the Carr Fire, located at 10657
12 Shurtleff, Shasta, California 96087.

13 356. At all times pertinent hereto LORENE BRUSHETT was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 10657 Shurtleff, Shasta, California 96087.

16 357. At all times pertinent hereto BRETT FLOURNOY was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15992 Rock Creek Rd, Redding, California 96001.

19 358. At all times pertinent hereto KATHLEEN FLOURNOY was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 15992 Rock Creek Rd, Redding, California 96001.

22 359. At all times pertinent hereto ROBERT GERKE was an owner and/or occupant of
23 real property and owner of personal property damaged by the Carr Fire, located at 1276
24 Diamond Bar Court, Redding, California 96003.

25 360. At all times pertinent hereto MARY ANN LARSON-GERKE was an owner
26 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
27 located at 1276 Diamond Bar Court, Redding, California 96003.

28 361. At all times pertinent hereto DAVID HOLTEL was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 11573 Center
2 Street, Redding, California 96001.

3 362. At all times pertinent hereto DARLENE HOLTEL was an owner and/or
4 occupant of real property and owner of personal property damaged by the Carr Fire, located at
5 11573 Center Street, Redding, California 96001.

6 363. At all times pertinent hereto ARTHUR INDIE JR. was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at 1370
8 Ridge Drive, Redding, California 96001.

9 364. At all times pertinent hereto BETTY KERBY was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 16182 Bush
11 Street, Redding, California 96001.

12 365. At all times pertinent hereto DIANA LEININGER was an owner and/or
13 occupant of real property and owner of personal property damaged by the Carr Fire, located at
14 4321 Eureka Way, Redding, California 96001.

15 366. At all times pertinent hereto SCOTT LEININGER was an owner and/or
16 occupant of real property and owner of personal property damaged by the Carr Fire, located at
17 4321 Eureka Way, Redding, California 96001.

18 367. At all times pertinent hereto CHRIS SPLIETHOF was an owner and/or occupant
19 of real property and owner of personal property damaged by the Carr Fire, located at 11547
20 Weiland Street, Redding, California 96001.

21 368. At all times pertinent hereto KENNETH SPLIETHOF was an owner and/or
22 occupant of real property and owner of personal property damaged by the Carr Fire, located at
23 10987 Bud Lane, Redding, California 96001.

24 369. At all times pertinent hereto MARY SPLIETHOF was an owner and/or occupant
25 of real property and owner of personal property damaged by the Carr Fire, located at 11547
26 Weiland Street, Redding, California 96001.

27 370. At all times pertinent hereto CLARK TUTHILL was an owner and/or occupant
28 of real property and owner of personal property damaged by the Carr Fire, located at 10150

1 Tilton Mine Road, Redding, California 96001.

2 371. At all times pertinent hereto LOUISE TUTHILL was an owner and/or occupant
3 of real property and owner of personal property damaged by the Carr Fire, located at 10150
4 Tilton Mine Road, Redding, California 96001.

5 372. At all times pertinent hereto JEFFREY WALSH was an owner and/or occupant
6 of real property and owner of personal property damaged by the Carr Fire, located at 17007
7 Keswick Damn Road, Redding, California 96003.

8 373. At all times pertinent hereto KATHLEEN WALSH was an owner and/or
9 occupant of real property and owner of personal property damaged by the Carr Fire, located at
10 17007 Keswick Damn Road, Redding, California 96003.

11 374. At all times pertinent hereto BRIAN WATTS was an owner and/or occupant of
12 real property and owner of personal property damaged by the Carr Fire, located at 16182 Bush
13 Street, Redding, California 96001.

14 375. At all relevant times herein, Plaintiff TERRI WEBB was an owner and/or
15 occupant of real property and owner of personal property damaged by the Carr Fire, located at
16 17007 Keswick Damn Road, Redding, California 96003. Further, that, at all times pertinent
17 hereto, plaintiff TERRI WEBB is the surviving spouse of MICHAEL O'SHEA, deceased.
18 Plaintiff is the heir at law and successor in interest to MICHAEL O'SHEA, deceased, who
19 passed away due to injuries exacerbated and sustained during the Carr Fire, and TERRI WEBB
20 brings this lawsuit in that capacity. A Declaration as to Heir at Law and Successor in Interest
21 will be submitted concurrently herewith.

22 376. At all times pertinent hereto NICKOLAS YOST was an owner and/or occupant
23 of real property and owner of personal property damaged by the Carr Fire, located at 11588
24 Market Street, Redding, California 96001 and 16027 Sacramento Street, Redding, California
25 96001.

26 377. At all times pertinent hereto LILLIAN YOST was an owner and/or occupant of
27 real property and owner of personal property damaged by the Carr Fire, located at 11588
28 Market Street, Redding, California 96001 and 16027 Sacramento Street, Redding, California

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96001.

Plaintiffs for Government Tort Claims filed on May 3, 2019

378. On May 3, 2019, the following plaintiffs filed a Government Tort Claim and Application for Leave to Present Late Claim with the STATE **out of an excess of caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim presentation requirements on behalf of the following plaintiffs, and the late claim was not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is not required for the inverse condemnation cause of action (Government Code section 905.1); and 3) several of the claims against defendants only involve damage to property, which has a one year statute of limitation (Government Code section 911.2) and the May 3, 2019, claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is available upon request.

379. The time has not yet expired for the STATE to accept or reject the claim / Application for Leave to Present Late Claim. However, based on the previous denials in this case, plaintiffs believe that this claim/application for late claim will likewise be denied. A Petition for Relief of the Late Claim Presentation Requirements will be filed should the need arise, and this Complaint will be amended once the late claim is denied to include the operative denial date.

380. At all times pertinent hereto CHRISTOPHER BARNHART was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 9657 Swasey Drive, Redding, California 96001.

381. At all times pertinent hereto JO ELLEN BARNHART was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 9657 Swasey Drive, Redding, California 96001.

382. At all times pertinent hereto BENSON HODGES was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 15207 Rock Creek Rd, Shasta, California 96087, and 15191 Rock Creek Rd, Shasta, California 96087.

383. At all times pertinent hereto MICHAEL LAW was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 11354 Menlo
2 Way, Redding, California 96002.

3 384. At all times pertinent hereto BRENT LEMLER was an owner and/or occupant of
4 real property and owner of personal property damaged by the Carr Fire, located at 10095 Tilton
5 Mine Road, Redding, California 96001.

6 385. At all times pertinent hereto DONNA LEMLER was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at 10095
8 Tilton Mine Road, Redding, California 96001.

9 386. At all times pertinent hereto RICKY LEMLER was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 10095 Tilton
11 Mine Road, Redding, California 96001.

12 387. At all times pertinent hereto GRACE LEMON was an owner and/or occupant of
13 real property and owner of personal property damaged by the Carr Fire, located at 15207 Rock
14 Creek Rd, Shasta, California 96087, and 15191 Rock Creek Rd, Shasta, California 96087.

15 388. At all times pertinent hereto MADELINE MILLER was an owner and/or
16 occupant of real property and owner of personal property damaged by the Carr Fire, located at
17 15606 Hwy 299 W, Shasta, California 96087.

18 389. At all times pertinent hereto STEPHEN MILLER was an owner and/or occupant
19 of real property and owner of personal property damaged by the Carr Fire, located at 15606
20 Hwy 299 W, Shasta, California 96087.

21 390. At all times pertinent hereto REBECCA SMITH was an owner and/or occupant
22 of real property and owner of personal property damaged by the Carr Fire, located at 11547
23 Weiland Street, Redding, California 96001.

24 391. At all times pertinent hereto RACHAL YARNALL was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 11341 Puffin Way, Redding, California 96003.

27 392. At all times pertinent hereto ROGER YARNALL was an owner and/or occupant
28 of real property and owner of personal property damaged by the Carr Fire, located at 11341

1 Puffin Way, Redding, California 96003.

2 393. At all relevant times herein, Plaintiff YARNALL CONSTRUCTION was a
3 business located at 11341 Puffin Way, Redding, California 96003, which provided construction
4 services in and around Shasta County, which was destroyed or damaged by the Carr Fire. At all
5 relevant times herein, Plaintiff ROGER YARNALL was an owner or operator of YARNALL
6 CONSTRUCTION.

7 Plaintiffs for Government Tort Claims filed on May 15, 2019

8 394. On May 15, 2019, the following plaintiffs filed a Government Tort Claim and
9 Application for Leave to Present Late Claim with the STATE **out of an excess of caution only**
10 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
11 presentation requirements on behalf of the following plaintiffs, and the late claim was not
12 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
13 not required for the inverse condemnation cause of action (Government Code section 905.1);
14 and 3) several of the claims against defendants only involve damage to property, which has a
15 one year statute of limitation (Government Code section 911.2) and the May 15, 2019, claim
16 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
17 upon request.

18 395. The time has not yet expired for the STATE to accept or reject the claim /
19 Application for Leave to Present Late Claim. However, based on the previous denials in this
20 case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
21 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
22 arise, and this Complaint will be amended once the late claim is denied to include the operative
23 denial date.

24 396. At all times pertinent hereto LAN SOKSODA-BENNETT was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 11292 Dekkas Pom Ct, Shasta, California 96087, and 15611 Rock Creek Rd, Shasta, California
27 96087.

28 397. At all times pertinent hereto KATHLEEN CARPENTER was an owner and/or

1 occupant of real property and owner of personal property damaged by the Carr Fire, located at
2 16103 School Street, Redding, California 96001.

3 398. At all times pertinent hereto SAMUEL CARPENTER was an owner and/or
4 occupant of real property and owner of personal property damaged by the Carr Fire, located at
5 16103 School Street, Redding, California 96001.

6 399. At all times pertinent hereto JON CROPSEY was an owner and/or occupant of
7 real property and owner of personal property damaged by the Carr Fire, located at 11342 1/2
8 Cactus Lane, Redding, California 96003.

9 400. At all times pertinent hereto MISTIE CRUZ was an owner and/or occupant of
10 real property and owner of personal property damaged by the Carr Fire, located at 1375
11 Spinnaker Drive, Redding, California 96003.

12 401. At all times pertinent hereto KIM CRUZ-MALENTINO was an owner and/or
13 occupant of real property and owner of personal property damaged by the Carr Fire, located at
14 1375 Spinnaker Drive, Redding, California 96003. At all times pertinent hereto, KIM CRUZ-
15 MALENTINO was a dependent adult, and will be represented by her Guardian ad Litem,
16 MISTIE CRUZ.

17 402. At all times pertinent hereto KATHERINE JONES was an owner and/or
18 occupant of real property and owner of personal property damaged by the Carr Fire, located at
19 3426 Grey Cape Court, Redding, California 96003.

20 403. At all times pertinent hereto PELE TUPUOLA CRUZ was an owner and/or
21 occupant of real property and owner of personal property damaged by the Carr Fire, located at
22 1375 Spinnaker Drive, Redding, California 96003.

23 Plaintiffs for Government Tort Claims filed on May 20, 2019

24 404. On May 20, 2019, the following plaintiffs filed a Government Tort Claim and
25 Application for Leave to Present Late Claim with the STATE out of an excess of caution only
26 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
27 presentation requirements on behalf of the following plaintiffs, and the late claim was not
28 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is

1 not required for the inverse condemnation cause of action (Government Code section 905.1);
2 and 3) several of the claims against defendants only involve damage to property, which has a
3 one year statute of limitation (Government Code section 911.2) and the May 20, 2019, claim
4 was therefore timely. A copy of the Application for Late Claim, and Late Claim is available
5 upon request.

6 405. The STATE rejected the claim for property damage by letter on May 29, 2019.
7 A true and correct copy of the rejection letter is attached hereto as **Exhibit "L"** and
8 incorporated herein by reference.

9 406. The time has not yet expired for the STATE to accept or reject the claim /
10 Application for Leave to Present Late Claim. However, based on the previous denials in this
11 case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
12 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
13 arise, and this Complaint will be amended once the late claim is denied to include the operative
14 denial date.

15 407. At all times pertinent hereto FLORA DAVIS was an owner and/or occupant of
16 real property and owner of personal property damaged by the Carr Fire, located at 11462
17 Quartz Hill Rd, Redding, California 96003.

18 408. At all times pertinent hereto SUSAN GALEN was an owner and/or occupant of
19 real property and owner of personal property damaged by the Carr Fire, located at 2737 Swasey
20 Drive, Redding, California 96001.

21 409. At all times pertinent hereto GARLAND LEDBETTER was an owner and/or
22 occupant of real property and owner of personal property damaged by the Carr Fire, located at
23 12801 East Fork Road, French Gulch, California 96033.

24 410. At all times pertinent hereto PATRICIA J. LEDBETTER was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 12801 East Fork Road, French Gulch, California 96033.

27 411. At all times pertinent hereto KOURTNIE CRUZ-MALENTINO was an owner
28 and/or occupant of real property and owner of personal property damaged by the Carr Fire,

1 located at 1375 Spinnaker Drive, Redding, California 96003.

2 412. At all times pertinent hereto BONNIE RHODES-MARTIN was an owner and/or
3 occupant of real property and owner of personal property damaged by the Carr Fire, located at
4 16179 Stone Street, Redding, California 96001.

5 413. At all times pertinent hereto PHILLIP OWEN was an owner and/or occupant of
6 real property and owner of personal property damaged by the Carr Fire, located at 11489
7 California Street, Redding, California 96001.

8 414. At all times pertinent hereto REID OWEN was an owner and/or occupant of real
9 property and owner of personal property damaged by the Carr Fire, located at 11489 California
10 Street, Redding, California 96001.

11 415. At all times pertinent hereto JENNIE PEIKERT was an owner and/or occupant
12 of real property and owner of personal property damaged by the Carr Fire, located at 11489
13 California Street, Redding, California 96001.

14 416. At all times pertinent hereto TIMOTHY POLAND was an owner and/or
15 occupant of real property and owner of personal property damaged by the Carr Fire, located at
16 12801 East Fork Road, French Gulch, California 96033.

17 417. At all times pertinent hereto TRAVIS RHODES was an owner and/or occupant
18 of real property and owner of personal property damaged by the Carr Fire, located at 16179
19 Stone Street, Redding, California 96001.

20 418. At all times pertinent hereto RAY ZELLER was an owner and/or occupant of
21 real property and owner of personal property damaged by the Carr Fire, located at 825 Redbud
22 Drive, Redding, California 96001.

23 419. At all times pertinent hereto THERESA ZELLER was an owner and/or occupant
24 of real property and owner of personal property damaged by the Carr Fire, located at 825
25 Redbud Drive, Redding, California 96001.

26 Plaintiffs for Government Tort Claims filed on June 3, 2019

27 420. On June 3, 2019, the following plaintiffs filed a Government Tort Claim and
28 Application for Leave to Present Late Claim with the STATE out of an excess of caution only

1 since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied any claim
2 presentation requirements on behalf of the following plaintiffs, and the late claim was not
3 required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A claim is
4 not required for the inverse condemnation cause of action (Government Code section 905.1);
5 and 3) several of the claims against defendants only involve damage to property, which has a
6 one year statute of limitation (Government Code section 911.2) and the June 3, 2019, claim was
7 therefore timely. A copy of the Application for Late Claim, and Late Claim is available upon
8 request.

9 421. The time has not yet expired for the STATE to accept or reject the claim /
10 Application for Leave to Present Late Claim. However, based on the previous denials in this
11 case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
12 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
13 arise, and this Complaint will be amended once the late claim is denied to include the operative
14 denial date.

15 422. At all times pertinent hereto LYNN ADAMS was an owner and/or occupant of
16 real property and owner of personal property damaged by the Carr Fire, located at 11342 Cactus
17 Lane, Redding, California 96003.

18 423. At all times pertinent hereto HEATHER ALVAREZ was an owner and/or
19 occupant of real property and owner of personal property damaged by the Carr Fire, located at
20 11478 California Street, Redding, California 96001.

21 424. At all times pertinent hereto EDWARD ANDERSON was an owner and/or
22 occupant of real property and owner of personal property damaged by the Carr Fire, located at
23 16050 Laurie Ann Lane, Redding, California 96001.

24 425. At all times pertinent hereto ROY BONGARD was an owner and/or occupant of
25 real property and owner of personal property damaged by the Carr Fire, located at 15380 Buell
26 Alley, Shasta, California 96087.

27 426. At all times pertinent hereto DENNIS BRADFORD was an owner and/or
28 occupant of real property and owner of personal property damaged by the Carr Fire, located at

1 11528 Market Street, Redding, California 96001.

2 427. At all times pertinent hereto EVELYN COLON was an owner and/or occupant
3 of real property and owner of personal property damaged by the Carr Fire, located at 11474
4 California Street, Redding, California 96001; and 11478 California Street, Redding, California
5 96001

6 428. At all times pertinent hereto LOUISE GIRARD was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at 3352
8 Harlan Drive, Redding, California 96003.

9 429. At all times pertinent hereto RONALD GIRARD was an owner and/or occupant
10 of real property and owner of personal property damaged by the Carr Fire, located at 3352
11 Harlan Drive, Redding, California 96003.

12 430. At all times pertinent hereto JAMES HEPLER was an owner and/or occupant of
13 real property and owner of personal property damaged by the Carr Fire, located at 4802 Trinity
14 Mountain Road, French Gulch, California, 96032.

15 431. At all times pertinent hereto CORINA KOUSEN was an owner and/or occupant
16 of real property and owner of personal property damaged by the Carr Fire, located at 11258
17 Iron Mountain Road, Redding, California 96001.

18 432. At all times pertinent hereto KAREL KOUSEN was an owner and/or occupant
19 of real property and owner of personal property damaged by the Carr Fire, located at 11258
20 Iron Mountain Road, Redding, California.

21 433. At all times pertinent hereto ARTHUR MCKAY-LIFQUIST was an owner
22 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
23 located at 16084 Laurie Ann Lane, Redding, California 96001 and 16050 Laurie Ann Lane,
24 Redding, California 96001.

25 434. At all times pertinent hereto JUDY MCKAY-LIFQUIST was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 16084 Laurie Ann Lane, Redding, California 96001 and 16050 Laurie Ann Lane, Redding,
28 California 96001.

1 435. At all times pertinent hereto THEODORE LILLY was an owner and/or occupant
2 of real property and owner of personal property damaged by the Carr Fire, located at 2985
3 Harlan Drive, Redding, California 96003.

4 436. At all times pertinent hereto JOSEPH LUNSFORD was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 2985 Harlan Drive, Redding, California 96003.

7 437. At all times pertinent hereto BARBARA MOORE was an owner and/or occupant
8 of real property and owner of personal property damaged by the Carr Fire, located at 3344
9 Harlan Drive, Redding, California 96003.

10 438. At all times pertinent hereto LOUIS MOORE was an owner and/or occupant of
11 real property and owner of personal property damaged by the Carr Fire, located at 3344 Harlan
12 Drive, Redding, California 96003.

13 439. At all times pertinent hereto MIGUEL NUNEZ was an owner and/or occupant of
14 real property and owner of personal property damaged by the Carr Fire, located at 15606 Hwy
15 299, West Shasta, California 96087.

16 440. At all times pertinent hereto JOLAINA PELTIER was an owner and/or occupant
17 of real property and owner of personal property damaged by the Carr Fire, located at 1189
18 Kellinger Street, Redding, California 96003.

19 441. All of the aforementioned plaintiffs set forth in paragraphs 4 - 440 are
20 hereinafter collectively referred to as "the STATE Plaintiffs" or individually by name.

21 STATE Defendants

22 442. Plaintiffs are informed and believe and thereon allege that, at all times pertinent
23 hereto, defendants THE STATE OF CALIFORNIA and THE STATE OF CALIFORNIA,
24 DEPARTMENT OF TRANSPORTATION were, respectively, a public entity, to wit, a state
25 government, and one of its departments operating in and under the laws of the State of
26 California, with their principal place(s) of business located in the City of Sacramento, County
27 of Sacramento, State of California. Defendants THE STATE OF CALIFORNIA and THE
28 STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION are hereinafter

1 collectively referred to as “defendants STATE.”

2 443. That the true names or capacities, whether individual, corporate, associate or
3 otherwise, of defendant DOES 1 through 500, inclusive, are unknown to plaintiffs, who,
4 therefore, sue said defendants by such fictitious names. Plaintiffs are informed and believe and
5 thereon allege that each of the defendants designated herein as a DOE is negligently,
6 intentionally, or in some other manner, responsible for the events and happenings herein
7 referred to and negligently, intentionally, or in some other manner, caused injury and damages
8 proximately thereby to the plaintiffs as herein alleged.

9 444. That, at all times pertinent hereto, each of the defendants was the agent and/or
10 employee of each of the remaining defendants and was acting within the purpose and scope of
11 said agency and/or employment, and each defendant has ratified and/or approved the acts of the
12 remaining defendants.

13 **THE PARTIES**
14 **(As to Defendants, City of Redding and Does 250 through 500 ONLY)**

15 445. **As to defendant, City of Redding, and Does 251-500:** The plaintiffs set forth
16 below, bring this lawsuit on behalf of themselves, individually, and as representatives on behalf
17 of those similarly situated, to wit: a) all owners of real property (both personal and business
18 property) within the City of Redding that was damaged or destroyed as a result of the Carr Fire;
19 b) all owners of personal property (both business and personal property) within the City of
20 Redding that was damaged or destroyed as a result of the Carr Fire; and c) all persons who have
21 claims for emotional damage, bodily injury or wrongful death within the City of Redding as a
22 result of the Carr Fire.

23 Plaintiffs as to Government Tort Claims filed on November 5, 2018 (original claim), November
24 14, 2018 (first amended claim), December 7, 2018 (second amended claim), and/or January 23,
25 2019 (third amended claim.)

26 446. At all relevant times herein, Plaintiff W. JAXON BAKER was an owner and/or
27 occupant of real property and owner of personal property damaged by the Carr Fire, located at
28 812 Santa Cruz Drive, Redding, California 96003.

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447. At all relevant times herein, Plaintiff KATE BAKER was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 812 Santa Cruz Drive, Redding, California 96003.

448. At all relevant times herein, Plaintiff JAROD ABRAHAM was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1050 Albion Avenue, Redding, California 96003.

449. At all relevant times herein, Plaintiff ROSEY ABRAHAM was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1050 Albion Avenue, Redding, California 96003.

450. At all relevant times herein, Plaintiff DONALD ADAMS was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1703 Ridge Drive, Redding, California, 96001.

451. At all relevant times herein, Plaintiff DEBORAH ADAMS was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1703 Ridge Drive, Redding, California, 96001.

452. At all relevant times herein, Plaintiff DEBRA ALLEN was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 3474 Showboat Court, Redding, California 96003.

453. At all relevant times herein, Plaintiff TED AUKLAND was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 871 Santa Cruz Drive, Redding, California 96003.

454. At all relevant times herein, Plaintiff DEBHORA AUKLAND was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 871 Santa Cruz Drive, Redding, California 96003.

455. At all relevant times herein, Plaintiff CHARLOTTE KELLER BAILEY was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 1339 River Ridge Drive, Redding, California 96003.

1 456. At all relevant times herein, Plaintiff JOSE BRIONES was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 11151 Baker Rd., Redding, California 96003.

4 457. At all relevant times herein, Plaintiff LUIS BRIONES was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 11151 Baker Rd., Redding, California 96003.

7 458. At all relevant times herein, Plaintiff TODD BUCK was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 1208 Yacht Court, Redding, California 96003.

10 459. At all relevant times herein, Plaintiff AMPARO BUCK was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 1208 Yacht Court, Redding, California 96003.

13 460. At all relevant times herein, Plaintiff AMBER BUSH was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 1392 Ridge Drive, Redding, California 96001.

16 461. At all relevant times herein, Plaintiff JEFF CARMACK was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 1372 Spinnaker Drive, Redding, California 96003.

19 462. At all relevant times herein, Plaintiff MICHELLE CARMACK was an owner
20 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
21 located at 1372 Spinnaker Drive, Redding, California 96003.

22 463. At all relevant times herein, Plaintiff PARVIN CARTER was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 859 Santa Cruz Drive, Redding, California 96001.

25 464. At all relevant times herein, Plaintiff KIM CATON was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 3530 First Cabin Court #3, Redding, California 96003.

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465. At all relevant times herein, Plaintiff CHRISTOPHER CATON was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 3530 First Cabin Court #3, Redding, California 96003.

466. At all relevant times herein, Plaintiff JAMES CHARLTON was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11260 Quartz Hill Road, Redding, California 96003.

467. At all relevant times herein, Plaintiff MARK CHITWOOD was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 4744 Ferrington Court, Redding, California 96003.

468. At all relevant times herein, Plaintiff MICHAEL COFFEY was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 990 Coggins Street, Redding, California 96003.

469. At all relevant times herein, Plaintiff BENJAMINA COFFEY was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 990 Coggins Street, Redding, California 96003.

470. At all relevant times herein, Plaintiff COURTNEY COLUNGA was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 957 Abion Avenue, Redding, California 96003.

471. At all relevant times herein, Plaintiff JONATHAN DAGG was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 827 Santa Cruz Drive, Redding, California 96003.

472. At all relevant times herein, Plaintiff SHARON DAGG was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 827 Santa Cruz Drive, Redding, California 96003.

473. At all relevant times herein, Plaintiff WILLIAM DAVIS was an owner and/or occupant of real property and owner of personal property damaged by the Carr Fire, located at 11460 Quartz Hill Road, Redding, California 96003.

1 474. At all relevant times herein, Plaintiff SHISHIR DHRUVA was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 3728 Sunflower Dr, Redding, California 96001.

4 475. At all relevant times herein, Plaintiff KALPANA DHRUVA was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 3728 Sunflower Dr, Redding, California 96001.

7 476. At all relevant times herein, Plaintiff JUDY ECHELBERGER was an owner
8 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
9 located at 16953 Cape Cod Dr., Redding, California 96003.

10 477. At all relevant times herein, Plaintiff SCOTT ELFORD was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 1336 River Ridge Drive, Redding, California 96003.

13 478. At all relevant times herein, Plaintiff THERESA ELFORD was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 1336 River Ridge Drive, Redding, California 96003.

16 479. At all relevant times herein, Plaintiff ROBERT ENGLE was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 864 Coggins Street, Redding, California 96003.

19 480. At all relevant times herein, Plaintiff ADELE ENGLE was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 864 Coggins Street, Redding, California 96003.

22 481. At all relevant times herein, Plaintiff DIVAN FARD was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 859 Santa Cruz Drive, Redding, California 96001.

25 482. At all relevant times herein, Plaintiff MARIA GARCIA was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 11151 Baker Rd., Redding, California 96003.

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1 483. At all relevant times herein, Plaintiff ALEXANDER GAXIOLA was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 3459 Footbridge Court, Redding, California 96003.

4 484. At all relevant times herein, Plaintiff REBECCA GAXIOLA was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 3459 Footbridge Court, Redding, California 96003.

7 485. At all relevant times herein, Plaintiff JESSE GOMEZ was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 1313 River Ridge Dr., Redding, California 96003.

10 486. At all relevant times herein, Plaintiff MELISSA GRUHLER was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 1265 Coggins St., Redding, California 96003.

13 487. At all relevant times herein, Plaintiff SCOTT GRUHLER was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 1265 Coggins St., Redding, California 96003.

16 488. At all relevant times herein, Plaintiff JOHN HARRINGTON was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 4723 Ferrington Ct, Redding, California 96003.

19 489. At all relevant times herein, Plaintiff MICHELLE HARRINGTON was an owner
20 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
21 located at 4723 Ferrington Ct, Redding, California 96003.

22 490. At all relevant times herein, Plaintiff JAMES HICKENBOTTOM was an owner
23 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
24 located at 4795 Brincard Way, Redding, California 96003.

25 491. At all relevant times herein, Plaintiff FAYE HICKENBOTTOM was an owner
26 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
27 located at 4795 Brincard Way, Redding, California 96003.

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1 492. At all relevant times herein, Plaintiff DENNIS JONES-RUSSO was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 1189 Kellinger Street, Redding, California 96003.

4 493. At all relevant times herein, Plaintiff JACQUELINE JONES-RUSSO was an
5 owner and/or occupant of real property and owner of personal property damaged by the Carr
6 Fire, located at 1189 Kellinger Street, Redding, California 96003.

7 494. At all relevant times herein, Plaintiff RUSSELL KAFEL was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 983 Coggins Street, Redding, California 96003.

10 495. At all relevant times herein, Plaintiff JOAN KAFEL was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 983 Coggins Street, Redding, California 96003.

13 496. At all relevant times herein, Plaintiff JAMES KING was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 15217 Mountain Shadow Drive, Redding, California 96001.

16 497. At all relevant times herein, Plaintiff TRINA KING was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 15217 Mountain Shadow Drive, Redding, California 96001.

19 498. At all relevant times herein, Plaintiff JERRY MARTIN was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 1147 Coggins Street, Redding, California 96003.

22 499. At all relevant times herein, Plaintiff MADELINE MARTIN was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 1147 Coggins Street, Redding, California 96003.

25 500. At all relevant times herein, Plaintiff LAURA MCHANEY was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 828 Santa Cruz Dr., Redding, California 96003.

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1 501. At all relevant times herein, Plaintiff DOUGLAS MCDONALD was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 15078 Rock Creek Road, Shasta, California 96087.

4 502. At all relevant times herein, Plaintiff FRANKLIN MCLAUGHLIN was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 11114 1/2 Salvation Flat Road, Redding, California 96001.

7 503. At all relevant times herein, Plaintiff CINDY MCLAUGHLIN was an owner
8 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
9 located at 11114 1/2 Salvation Flat Road, Redding, California 96001.

10 504. At all relevant times herein, Plaintiff MATTHEW MITCHELL was an owner
11 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
12 located at 1051 Wildwood Lane, Redding, California 96001.

13 505. At all relevant times herein, Plaintiff LYNSEY MITCHELL was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 1051 Wildwood Lane, Redding, California 96001.

16 506. At all relevant times herein, Plaintiff MICHAEL NAPOLI was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 3608 Steamboat Street, Redding, California 96003.

19 507. At all relevant times herein, Plaintiff DIANE NAPOLI was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 3608 Steamboat Street, Redding, California 96003.

22 508. At all relevant times herein, Plaintiff MARILYN PETERS was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 986 Albion Avenue, Redding, California 96003.

25 509. At all relevant times herein, Plaintiff NICHOLAS PETERS was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 986 Albion Avenue, Redding, California 96003.

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1 510. At all relevant times herein, Plaintiff MATTHEW POHLMAYER was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 1010 Albion Avenue, Redding, California 96003.

4 511. At all relevant times herein, Plaintiff LIZETTE POHLMAYER was an owner
5 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
6 located at 1010 Albion Avenue, Redding, California 96003.

7 512. At all relevant times herein, Plaintiff ERNEST PRICE was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 591 Turquoise Ct., Redding, California 96003.

10 513. At all relevant times herein, Plaintiff JAMES RICH was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 1132 Coggins Street, Redding, California 96003.

13 514. At all relevant times herein, Plaintiff STELLA RICH was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 1132 Coggins Street, Redding, California 96003.

16 515. At all relevant times herein, Plaintiff KENNETH RHODES was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 4831 Ferrington Court, Redding, California 96003.

19 516. At all relevant times herein, Plaintiff FRANCES ROBERTS was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 910 Santa Cruz Dr., Redding, California 96003.

22 517. At all relevant times herein, Plaintiff SUSHMA SANGITA was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 824 Santa Cruz Dr., Redding, California 96003.

25 518. At all relevant times herein, Plaintiff TIMOTHY SHARP was an owner and/or
26 occupant of real property and owner of personal property damaged by the Carr Fire, located at
27 1058 Coggins Street, Redding, California, 96003.

28

1 519. At all relevant times herein, Plaintiff JAIMIE SHARP was an owner and/or
2 occupant of real property and owner of personal property damaged by the Carr Fire, located at
3 1058 Coggins Street, Redding, California, 96003.

4 520. At all relevant times herein, Plaintiff GEORGE SHIRLEY was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 3545 First Cabin Court, Redding, California 96003.

7 521. At all relevant times herein, Plaintiff JANET SHIRLEY was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 3545 First Cabin Court, Redding, California 96003.

10 522. At all relevant times herein, Plaintiff ROBERT SMITH was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 1057 Coggins Street, Redding, California 96003.

13 523. At all relevant times herein, Plaintiff JODY SMITH was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 1057 Coggins Street, Redding, California 96003.

16 524. At all relevant times herein, Plaintiff RAND STERRETT was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 1095 Albion Avenue, Redding, California, 96003.

19 525. At all relevant times herein, Plaintiff CALLIE STERRETT was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 1095 Albion Avenue, Redding, California, 96003.

22 526. At all relevant times herein, Plaintiff TIM STROHMAYER was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 973 Albion Avenue, Redding, California 96003.

25 527. At all relevant times herein, Plaintiff THIRUVOIPATI NANDAKUMAR was an
26 owner and/or occupant of real property and owner of personal property damaged by the Carr
27 Fire, located at 824 Santa Cruz Dr., Redding, California 96003.

28

1 528. At all relevant times herein, Plaintiff YASODA THIRUVOIPATI was an owner
2 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
3 located at 824 Santa Cruz Dr., Redding, California 96003.

4 529. At all relevant times herein, Plaintiff THOM TURNER was an owner and/or
5 occupant of real property and owner of personal property damaged by the Carr Fire, located at
6 15830 Whispering Woods Trail, Redding, California 96001.

7 530. At all relevant times herein, Plaintiff NANCY WHITE was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 15830 Whispering Woods Trail, Redding, California 96001.

10 531. At all relevant times herein, Plaintiff LINDA WICKEL was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 879 Santa Cruz Drive, Redding, California 96003.

13 532. At all relevant times herein, Plaintiff EDWARD ZAWADA was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 4660 Kilkee Drive, Redding, California 96001.

16 533. At all relevant times herein, Plaintiff NANCY ZAWADA was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 4660 Kilkee Drive, Redding, California 96001.

19 534. At all relevant times herein, Plaintiff ED BLEDSOE was an owner and/or
20 occupant of real property and owner of personal property damaged by the Carr Fire, located at
21 11245 Quartz Hill Road, Redding, California 96003. Further, that, at all times pertinent hereto,
22 plaintiff ED BLEDSOE is the surviving spouse of MELODY BLEDSOE, deceased. Plaintiff is
23 the heir at law and successor in interest to MELODY BLEDSOE, deceased, and ED BLEDSOE
24 brings this lawsuit in that capacity.

25 535. At all relevant times herein, Plaintiff SHERRY BLEDSOE was a resident of the
26 City of Redding, County of Shasta, State of California. Further, that, at all times pertinent
27 hereto, plaintiff SHERRY BLEDSOE is the surviving mother of JAMES ARNOLD ROBERTS
28 and EMILY LEANNE ROBERTS, deceased, who perished at a residence located at 11245

1 Quartz Hill Road, Redding, California 96003. Plaintiff is the heir at law and successor in interest
2 to JAMES ARNOLD ROBERTS and EMILY LEANNE ROBERTS, deceased, and SHERRY
3 BLEDSOE brings this lawsuit in that capacity.

4 536. Plaintiffs are informed and believe and thereon allege that, at all times pertinent
5 hereto, defendant THE CITY OF REDDING was, a body politic, to wit, a local government,
6 with its principal places of business located in the City of Redding, County of Shasta, State of
7 California.

8 537. Plaintiffs complied with all administrative claim requirements prior to filing this
9 Complaint. More specifically,

- 10 a. On November 2, 2018, plaintiffs timely submitted their fully-executed
11 "*Government Claims Form*" to defendant CITY. (Copy available upon
12 request).
- 13 b. On November 14, 2018, plaintiffs timely submitted their fully-executed
14 "*First Amended Government Claims Form*" to defendant CITY. (Copy
15 available upon request).
- 16 c. On December 7, 2018, plaintiffs timely submitted their fully-executed
17 "*Second Amended Government Claims Form*" to defendant CITY. (Copy
18 available upon request).
- 19 d. On January 23, 2019, plaintiffs timely submitted their fully-executed
20 "*Third Amended Government Claims Form*" to defendant CITY.
- 21 e. On February 11, 2019, Defendant CITY sent a Notice of Insufficiency as
22 to the Third Amended Claim. A true and correct copy of Notice of
23 Insufficiency is attached hereto as **Exhibit "M"** and incorporated herein by
24 reference.
- 25 f. On February 26, 2019, plaintiffs timely submitted their fully-executed
26 "*Fourth Amended Government Claims Form*" to defendant CITY in response
27 to the Notice of Insufficiency. A true and correct copy of that fully-executed
28 "*Fourth Amended Government Claims Form*" is attached hereto as **Exhibit**

1 "N" and incorporated herein by reference (Exhibit A (pictures of parcels)
2 excluded, but available upon request.)

3 g. Defendant CITY rejected the aforementioned claims by operation of law
4 on April 12, 2019. (Government Code section 911.6.)

5 Plaintiffs for Government Tort Claims filed on February 8, 2019

6 538. On February 8, 2019, the following plaintiffs filed a Government Tort Claim and
7 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
8 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
9 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
10 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
11 claim is not required for the inverse condemnation cause of action (Government Code section
12 905.1); and 3) several of the claims against defendants only involve damage to property, which
13 has a one year statute of limitation (Government Code section 911.2) and the February 8, 2019,
14 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
15 available upon request.

16 539. The CITY OF REDDING has not yet acted on the Application for Leave to
17 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
18 late claim were denied as a matter of law on March 24, 2019. (See Government Code section
19 911.6).

20 540. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
21 again out of an excess of caution even though plaintiffs do not believe the late claim is required
22 for the reasons set forth in paragraph 538 above.

23 541. At all times pertinent hereto AMBER BOLLMANN was an owner and/or
24 occupant of real property and owner of personal property damaged by the Carr Fire, located at
25 1192 Coggins Street, Redding, California 96003.

26 542. At all times pertinent hereto TIMOTHY BOLLMANN was an owner and/or
27 occupant of real property and owner of personal property damaged by the Carr Fire, located at
28 1192 Coggins Street, Redding, California 96003.

1 543. At all times pertinent hereto SCOTT BREAR was an owner and/or occupant of
2 real property and owner of personal property damaged by the Carr Fire, located at 333 Bedrock
3 Lane, Redding, California 96001.

4 544. At all times pertinent hereto LINDA LORENZ was an owner and/or occupant of
5 real property and owner of personal property damaged by the Carr Fire, located at 333 Bedrock
6 Lane, Redding, California 96001.

7 545. At all times pertinent hereto DOUGLAS LUNSFORD was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 2985 Harlan Drive, Redding, California 96003.

10 546. At all times pertinent hereto PHYLLIS LUNSFORD was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 2985 Harlan Drive, Redding, California 96003.

13 547. At all times pertinent hereto LOW SAECHAO was an owner and/or occupant of
14 real property and owner of personal property damaged by the Carr Fire, located at 16105 Shasta
15 Street, Shasta, California 96087, and 11324 Menlo Way, Redding, California 96003.

16 548. At all times pertinent hereto MELISSA SAECHAO was an owner and/or
17 occupant of real property and owner of personal property damaged by the Carr Fire, located at
18 16105 Shasta Street, Shasta, California 96087, and 11324 Menlo Way, Redding, California
19 96003.

20 549. At all times pertinent hereto STEVE STRAND was an owner and/or occupant of
21 real property and owner of personal property damaged by the Carr Fire, located at 11349 Puffin
22 Way, Redding, California 96003. Further, at all times pertinent hereto, plaintiff was the
23 owner/operator or had an interest in a business, ALL SEASONS ROOF COATINGS operating
24 under the laws of the State of California, with its principal place of business located at 11349
25 Puffin Way, Redding, California 96003.

26 550. At all times pertinent hereto KAREN STRAND was an owner and/or occupant of
27 real property and owner of personal property damaged by the Carr Fire, located at 11349 Puffin
28 Way, Redding, California 96003. Further, at all times pertinent hereto, plaintiff was the

1 owner/operator or had an interest in a business, ALL SEASONS ROOF COATINGS operating
2 under the laws of the State of California, with its principal place of business located at 11349
3 Puffin Way, Redding, California 96003.

4 Plaintiffs for Government Tort Claims filed on March 1, 2019

5 551. On March 1, 2019, the following plaintiffs filed a Government Tort Claim and
6 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
7 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
8 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
9 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
10 claim is not required for the inverse condemnation cause of action (Government Code section
11 905.1); and 3) several of the claims against defendants only involve damage to property, which
12 has a one year statute of limitation (Government Code section 911.2) and the March 1, 2019,
13 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
14 available upon request.

15 552. The CITY OF REDDING has not yet acted on the Application for Leave to
16 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
17 late claim were denied as a matter of law on April 15, 2019. (See Government Code section
18 911.6).

19 553. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
20 again out of an excess of caution even though plaintiffs do not believe the late claim is required
21 for the reasons set forth in paragraph 551 above.

22 554. At all times pertinent hereto MARIA SNYDER-DURAN was an owner and/or
23 occupant of real property and owner of personal property damaged by the Carr Fire, located at
24 3492 Grey Cape Ct, Redding, California 96003.

25 555. At all times pertinent hereto SANDRA DURAN was an owner and/or occupant of
26 real property and owner of personal property damaged by the Carr Fire, located at 3492 Grey
27 Cape Ct, Redding, California 96003.

28 556. At all times pertinent hereto JOHN EVERETT III, DO was an owner and/or

1 occupant of real property and owner of personal property damaged by the Carr Fire, located at
2 846 Leisha Lane, Redding, California 96001.

3 557. At all times pertinent hereto JENNIFER EVERETT was an owner and/or
4 occupant of real property and owner of personal property damaged by the Carr Fire, located at
5 846 Leisha Lane, Redding, California 96001.

6 558. At all times pertinent hereto FRANK MOJARRO was an owner and/or occupant
7 of real property and owner of personal property damaged by the Carr Fire, located at 280
8 Moonstone Way, Redding, California 96003.

9 559. At all times pertinent hereto ALEJANDRO RIVERA was an owner and/or
10 occupant of real property and owner of personal property damaged by the Carr Fire, located at
11 16937 Cape Code Drive, Redding, California 96003.

12 560. At all times pertinent hereto NICOLE RIVERA was an owner and/or occupant of
13 real property and owner of personal property damaged by the Carr Fire, located at 16937 Cape
14 Code Drive, Redding, California 96003.

15 561. At all times pertinent hereto PAUL SNYDER was an owner and/or occupant of
16 real property and owner of personal property damaged by the Carr Fire, located at 3492 Grey
17 Cape Ct, Redding, California 96003.

18 Plaintiffs for Government Tort Claims filed on March 8, 2019

19 562. On March 8, 2019, the following plaintiffs filed a Government Tort Claim and
20 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
21 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
22 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
23 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
24 claim is not required for the inverse condemnation cause of action (Government Code section
25 905.1); and 3) several of the claims against defendants only involve damage to property, which
26 has a one year statute of limitation (Government Code section 911.2) and the March 8, 2019,
27 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
28 available upon request.

1 563. The CITY OF REDDING has not yet acted on the Application for Leave to
2 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
3 late claim were denied as a matter of law on April 22, 2019. (See Government Code section
4 911.6).

5 564. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
6 again out of an excess of caution even though plaintiffs do not believe the late claim is required
7 for the reasons set forth in paragraph 562 above.

8 565. At all times pertinent hereto DENNIS ALFARO was an owner and/or occupant
9 of real property and owner of personal property damaged by the Carr Fire, located at 892
10 Coggins Street, Redding, California 96003.

11 566. At all times pertinent hereto LORI STILLIE was an owner and/or occupant of
12 real property and owner of personal property damaged by the Carr Fire, located at 1421
13 Spinnaker Drive, Redding, California 96002.

14 567. At all times pertinent hereto ANTOINETTE TRIZUTO was an owner and/or
15 occupant of real property and owner of personal property damaged by the Carr Fire, located at
16 1284 Diamond Bar Ct., Redding, California 96003.

17 Plaintiffs for Government Tort Claims filed on March 15, 2019

18 568. On March 8, 2019, the following plaintiffs filed a Government Tort Claim and
19 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
20 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
21 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
22 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
23 claim is not required for the inverse condemnation cause of action (Government Code section
24 905.1); and 3) several of the claims against defendants only involve damage to property, which
25 has a one year statute of limitation (Government Code section 911.2) and the March 8, 2019,
26 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
27 available upon request.

28 569. The CITY OF REDDING has not yet acted on the Application for Leave to

1 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
2 late claim were denied as a matter of law on April 29, 2019. (See Government Code section
3 911.6).

4 570. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
5 again out of an excess of caution even though plaintiffs do not believe the late claim is required
6 for the reasons set forth in paragraph 568 above.

7 571. At all times pertinent hereto MAILE ALFARO was an owner and/or occupant of
8 real property and owner of personal property damaged by the Carr Fire, located at 892 Coggins
9 Street, Redding, California 96003.

10 Plaintiffs for Government Tort Claims filed on March 25, 2019

11 572. On March 25, 2019, the following plaintiffs filed a Government Tort Claim and
12 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
13 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
14 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
15 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
16 claim is not required for the inverse condemnation cause of action (Government Code section
17 905.1); and 3) several of the claims against defendants only involve damage to property, which
18 has a one year statute of limitation (Government Code section 911.2) and the March 25, 2019,
19 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
20 available upon request.

21 573. The CITY OF REDDING has not yet acted on the Application for Leave to
22 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
23 late claim were denied as a matter of law on May 9, 2019. (See Government Code section
24 911.6).

25 574. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
26 again out of an excess of caution even though plaintiffs do not believe the late claim is required
27 for the reasons set forth in paragraph 572 above.

28 575. At all times pertinent hereto JESUS BARRIOS was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 17075
2 Wagon Drive, Redding, California 96003.

3 576. At all times pertinent hereto EPHRAIM INGALS was an owner and/or occupant
4 of real property and owner of personal property damaged by the Carr Fire, located at 448
5 Turquoise Court, Redding, California 96003.

6 577. At all times pertinent hereto VERA INGALS was an owner and/or occupant of
7 real property and owner of personal property damaged by the Carr Fire, located at 448
8 Turquoise Court, Redding, California 96003.

9 Plaintiffs for Government Tort Claims filed on April 1, 2019

10 578. On April 1, 2019, the following plaintiffs filed a Government Tort Claim and
11 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
12 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
13 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
14 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
15 claim is not required for the inverse condemnation cause of action (Government Code section
16 905.1); and 3) several of the claims against defendants only involve damage to property, which
17 has a one year statute of limitation (Government Code section 911.2) and the April 1, 2019,
18 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
19 available upon request.

20 579. The CITY OF REDDING has not yet acted on the Application for Leave to
21 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
22 late claim were denied as a matter of law on May 16, 2019. (See Government Code section
23 911.6).

24 580. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
25 again out of an excess of caution even though plaintiffs do not believe the late claim is required
26 for the reasons set forth in paragraph 578 above.

27 581. At all times pertinent hereto CHRISTIEL HARTMAN was an owner and/or
28 occupant of real property and owner of personal property damaged by the Carr Fire, located at

1 17075 Wagon Drive, Redding, California 96003.

2 582. At all times pertinent hereto TINA CORONA was an owner and/or occupant of
3 real property and owner of personal property damaged by the Carr Fire, located at 420
4 Turquoise Court, Redding, California 96003.

5 583. At all times pertinent hereto JESUS CORONA was an owner and/or occupant of
6 real property and owner of personal property damaged by the Carr Fire, located at 420
7 Turquoise Court, Redding, California 96003.

8 584. At all times pertinent hereto CHRISTOPHER KUTRAS was an owner and/or
9 occupant of real property and owner of personal property damaged by the Carr Fire, located at
10 890 Sunriver Lane, Redding, California 96001, and Kutras ranch, Trinity Mountain Road.

11 585. At all times pertinent hereto TERRI KUTRAS was an owner and/or occupant of
12 real property and owner of personal property damaged by the Carr Fire, located at 890 Sunriver
13 Lane, Redding, California 96001, and Kutras ranch, Trinity Mountain Road.

14 Plaintiffs for Government Tort Claims filed on April 8, 2019

15 586. On April 8, 2019, the following plaintiffs filed a Government Tort Claim and
16 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
17 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
18 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
19 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
20 claim is not required for the inverse condemnation cause of action (Government Code section
21 905.1); and 3) several of the claims against defendants only involve damage to property, which
22 has a one year statute of limitation (Government Code section 911.2) and the April 8, 2019,
23 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
24 available upon request.

25 587. The CITY OF REDDING has not yet acted on the Application for Leave to
26 Present Late Claim or the Claim itself. As such, the claim and application for leave to present
27 late claim were denied as a matter of law on May 23, 2019. (See Government Code section
28 911.6).

1 588. A Petition for Relief of the Late Claim Presentation Requirements will be filed,
2 again out of an excess of caution even though plaintiffs do not believe the late claim is required
3 for the reasons set forth in paragraph 586 above.

4 589. At all times pertinent hereto LARRY HARTMAN was an owner and/or occupant
5 of real property and owner of personal property damaged by the Carr Fire, located at 17103
6 Wagon Drive, Redding, California 96003.

7 590. At all times pertinent hereto PENNY HARTMAN was an owner and/or occupant
8 of real property and owner of personal property damaged by the Carr Fire, located at 17085
9 Wagon Drive, Redding, California 96003.

10 591. At all times pertinent hereto WILLIE HARTMAN was an owner and/or
11 occupant of real property and owner of personal property damaged by the Carr Fire, located at
12 17103 Wagon Drive, Redding, California 96003.

13 592. At all times pertinent hereto DAVID SANDERSON was an owner and/or
14 occupant of real property and owner of personal property damaged by the Carr Fire, located at
15 17085 Wagon Drive, Redding, California 96003.

16 Plaintiffs for Government Tort Claims filed on April 29, 2019

17 593. On April 29, 2019, the following plaintiffs filed a Government Tort Claim and
18 Application for Leave to Present Late Claim with the CITY OF REDDING out of **an excess of**
19 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
20 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
21 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
22 claim is not required for the inverse condemnation cause of action (Government Code section
23 905.1); and 3) several of the claims against defendants only involve damage to property, which
24 has a one year statute of limitation (Government Code section 911.2) and the April 29, 2019,
25 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
26 available upon request.

27 594. The time has not yet expired for the CITY OF REDDING to accept or reject the
28 claim / Application for Leave to Present Late Claim. However, based on the previous denials in

1 this case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
2 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
3 arise, and this Complaint will be amended once the late claim is denied to include the operative
4 denial date.

5 595. At all times pertinent hereto ANGELA BEARD was an owner and/or occupant
6 of real property and owner of personal property damaged by the Carr Fire, located at 1005
7 Albion Ave, Redding, California, 96003.

8 596. At all times pertinent hereto JAMES BEARD was an owner and/or occupant of
9 real property and owner of personal property damaged by the Carr Fire, located at 1005 Albion
10 Ave, Redding, California, 96003.

11 597. At all times pertinent hereto ROBERT GERKE was an owner and/or occupant of
12 real property and owner of personal property damaged by the Carr Fire, located at 1276
13 Diamond Bar Court, Redding, California 96003.

14 598. At all times pertinent hereto MARY ANN LARSON-GERKE was an owner
15 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
16 located at 1276 Diamond Bar Court, Redding, California 96003.

17 599. At all times pertinent hereto ARTHUR INDIE JR. was an owner and/or occupant
18 of real property and owner of personal property damaged by the Carr Fire, located at 1370
19 Ridge Drive, Redding, California 96001.

20 600. At all times pertinent hereto DIANA LEININGER was an owner and/or
21 occupant of real property and owner of personal property damaged by the Carr Fire, located at
22 4321 Eureka Way, Redding, California 96001.

23 601. At all times pertinent hereto SCOTT LEININGER was an owner and/or
24 occupant of real property and owner of personal property damaged by the Carr Fire, located at
25 4321 Eureka Way, Redding, California 96001.

26 Plaintiffs for Government Tort Claims filed on May 3, 2019

27 602. On May 3, 2019, the following plaintiffs filed a Government Tort Claim and
28 Application for Leave to Present Late Claim with the CITY OF REDDING out of an excess of

1 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
2 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
3 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
4 claim is not required for the inverse condemnation cause of action (Government Code section
5 905.1); and 3) several of the claims against defendants only involve damage to property, which
6 has a one year statute of limitation (Government Code section 911.2) and the May 3, 2019,
7 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
8 available upon request.

9 603. The time has not yet expired for the CITY OF REDDING to accept or reject the
10 claim / Application for Leave to Present Late Claim. However, based on the previous denials in
11 this case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
12 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
13 arise, and this Complaint will be amended once the late claim is denied to include the operative
14 denial date.

15 604. At all times pertinent hereto MICHAEL LAW was an owner and/or occupant of
16 real property and owner of personal property damaged by the Carr Fire, located at 11354 Menlo
17 Way, Redding, California 96002.

18 605. At all times pertinent hereto RACHAL YARNALL was an owner and/or
19 occupant of real property and owner of personal property damaged by the Carr Fire, located at
20 11341 Puffin Way, Redding, California 96003.

21 606. At all times pertinent hereto ROGER YARNALL was an owner and/or occupant
22 of real property and owner of personal property damaged by the Carr Fire, located at 11341
23 Puffin Way, Redding, California 96003.

24 607. At all relevant times herein, Plaintiff YARNALL CONSTRUCTION was a
25 business located at 11341 Puffin Way, Redding, California 96003, which provided construction
26 services in and around Shasta County, which was destroyed or damaged by the Carr Fire. At all
27 relevant times herein, Plaintiff ROGER YARNALL was an owner or operator of YARNALL
28 CONSTRUCTION.

1 Plaintiffs for Government Tort Claims filed on May 15, 2019

2 608. On May 15, 2019, the following plaintiffs filed a Government Tort Claim and
3 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
4 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
5 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
6 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
7 claim is not required for the inverse condemnation cause of action (Government Code section
8 905.1); and 3) several of the claims against defendants only involve damage to property, which
9 has a one year statute of limitation (Government Code section 911.2) and the May 15, 2019,
10 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
11 available upon request.

12 609. The time has not yet expired for the CITY OF REDDING to accept or reject the
13 claim / Application for Leave to Present Late Claim. However, based on the previous denials in
14 this case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
15 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
16 arise, and this Complaint will be amended once the late claim is denied to include the operative
17 denial date.

18 610. At all times pertinent hereto JON CROPSEY was an owner and/or occupant of
19 real property and owner of personal property damaged by the Carr Fire, located at 11342 1/2
20 Cactus Lane, Redding, California 96003.

21 611. At all times pertinent hereto MISTIE CRUZ was an owner and/or occupant of
22 real property and owner of personal property damaged by the Carr Fire, located at 1375
23 Spinnaker Drive, Redding, California 96003.

24 612. At all times pertinent hereto KIM CRUZ-MALENTINO was an owner and/or
25 occupant of real property and owner of personal property damaged by the Carr Fire, located at
26 1375 Spinnaker Drive, Redding, California 96003. At all times pertinent hereto, KIM CRUZ-
27 MALENTINO was a dependent adult, and will be represented by her Guardian ad Litem,
28 MISTIE CRUZ. A true and correct copy of the *Application for Guardian ad Litem* will be filed

1 concurrently herewith.

2 613. At all times pertinent hereto KATHERINE JONES was an owner and/or
3 occupant of real property and owner of personal property damaged by the Carr Fire, located at
4 3426 Grey Cape Court, Redding, California 96003.

5 614. At all times pertinent hereto PELE TUPUOLA CRUZ was an owner and/or
6 occupant of real property and owner of personal property damaged by the Carr Fire, located at
7 1375 Spinnaker Drive, Redding, California 96003.

8 Plaintiffs for Government Tort Claims filed on May 20, 2019

9 615. On May 20, 2019, the following plaintiffs filed a Government Tort Claim and
10 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
11 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
12 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
13 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
14 claim is not required for the inverse condemnation cause of action (Government Code section
15 905.1); and 3) several of the claims against defendants only involve damage to property, which
16 has a one year statute of limitation (Government Code section 911.2) and the May 20, 2019,
17 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
18 available upon request.

19 616. The time has not yet expired for the CITY OF REDDING to accept or reject the
20 claim / Application for Leave to Present Late Claim. However, based on the previous denials in
21 this case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
22 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
23 arise, and this Complaint will be amended once the late claim is denied to include the operative
24 denial date.

25 617. At all times pertinent hereto KOURTNIE CRUZ-MALENTINO was an owner
26 and/or occupant of real property and owner of personal property damaged by the Carr Fire,
27 located at 1375 Spinnaker Drive, Redding, California 96003.

28 618. At all times pertinent hereto RAY ZELLER was an owner and/or occupant of

1 real property and owner of personal property damaged by the Carr Fire, located at 825 Redbud
2 Drive, Redding, California 96001.

3 619. At all times pertinent hereto THERESA ZELLER was an owner and/or occupant
4 of real property and owner of personal property damaged by the Carr Fire, located at 825
5 Redbud Drive, Redding, California 96001.

6 Plaintiffs for Government Tort Claims filed on June 3, 2019

7 620. On June 3, 2019, the following plaintiffs filed a Government Tort Claim and
8 Application for Leave to Present Late Claim with the CITY OF REDDING **out of an excess of**
9 **caution only** since 1) the class claim filed on November 5, 2018 – January 23, 2019, satisfied
10 any claim presentation requirements on behalf of the following plaintiffs, and the late claim was
11 not required (*City of San Jose v. Sup.Ct. (Lands Unlimited)* (1974) 12 C3d 447, 457); 2) A
12 claim is not required for the inverse condemnation cause of action (Government Code section
13 905.1); and 3) several of the claims against defendants only involve damage to property, which
14 has a one year statute of limitation (Government Code section 911.2) and the June 3, 2019,
15 claim was therefore timely. A copy of the Application for Late Claim, and Late Claim is
16 available upon request.

17 621. The time has not yet expired for the CITY OF REDDING to accept or reject the
18 claim / Application for Leave to Present Late Claim. However, based on the previous denials in
19 this case, plaintiffs believe that this claim/application for late claim will likewise be denied. A
20 Petition for Relief of the Late Claim Presentation Requirements will be filed should the need
21 arise, and this Complaint will be amended once the late claim is denied to include the operative
22 denial date.

23 622. At all times pertinent hereto LYNN ADAMS was an owner and/or occupant of
24 real property and owner of personal property damaged by the Carr Fire, located at 11342 Cactus
25 Lane, Redding, California 96003.

26 623. At all times pertinent hereto LOUISE GIRARD was an owner and/or occupant
27 of real property and owner of personal property damaged by the Carr Fire, located at 3352
28 Harlan Drive, Redding, California 96003.

1 624. At all times pertinent hereto RONALD GIRARD was an owner and/or occupant
2 of real property and owner of personal property damaged by the Carr Fire, located at 3352
3 Harlan Drive, Redding, California 96003.

4 625. At all times pertinent hereto THEODORE LILLY was an owner and/or occupant
5 of real property and owner of personal property damaged by the Carr Fire, located at 2985
6 Harlan Drive, Redding, California 96003.

7 626. At all times pertinent hereto JOSEPH LUNSFORD was an owner and/or
8 occupant of real property and owner of personal property damaged by the Carr Fire, located at
9 2985 Harlan Drive, Redding, California 96003.

10 627. At all times pertinent hereto BARBARA MOORE was an owner and/or occupant
11 of real property and owner of personal property damaged by the Carr Fire, located at 3344
12 Harlan Drive, Redding, California 96003.

13 628. At all times pertinent hereto LOUIS MOORE was an owner and/or occupant of
14 real property and owner of personal property damaged by the Carr Fire, located at 3344 Harlan
15 Drive, Redding, California 96003.

16 629. At all times pertinent hereto JOLAINA PELTIER was an owner and/or occupant
17 of real property and owner of personal property damaged by the Carr Fire, located at 430
18 Viewpoint Drive, Redding, California, 96003.

19 630. All of the aforementioned plaintiffs set forth in paragraphs 446 - 629 are
20 hereinafter collectively referred to as "the CITY Plaintiffs" or individually by name.

21 CITY Defendants

22 631. Plaintiffs are informed and believe and thereon allege that, at all times pertinent
23 hereto, defendant THE CITY OF REDDING was, a body politic, to wit, a local government,
24 with its principal places of business located in the City of Redding, County of Shasta, State of
25 California.

26 632. That the true names or capacities, whether individual, corporate, associate or
27 otherwise, of defendant DOES 1 through 500, inclusive, are unknown to plaintiffs, who,
28 therefore, sue said defendants by such fictitious names. Plaintiffs are informed and believe and

1 thereon allege that each of the defendants designated herein as a DOE is negligently,
2 intentionally, or in some other manner, responsible for the events and happenings herein
3 referred to and negligently, intentionally, or in some other manner, caused injury and damages
4 proximately thereby to the plaintiffs as herein alleged.

5 633. That, at all times pertinent hereto, each of the defendants was the agent and/or
6 employee of each of the remaining defendants and was acting within the purpose and scope of
7 said agency and/or employment, and each defendant has ratified and/or approved the acts of the
8 remaining defendants.

9 **CLASS ACTION ALLEGATIONS**
10 **(As to All Parties and All Causes of Action)**

11 634. The STATE Plaintiffs and the CITY Plaintiffs bring this action as a class action
12 pursuant to CCP § 382 on behalf of all persons who had real or personal property that was
13 destroyed or damaged as a result of the Carr Fire, and class members that sustained emotional
14 damage, bodily injury or had loved ones who suffered fatal injuries as a result of the Carr Fire.
15 Questions in this case are of a common or general interest, of many persons, and the parties are
16 numerous, and it is impracticable to bring them all before the court. Pursuant to Section 382
17 C.C.P., one or more may sue or defend for the benefit of all. The named Plaintiffs hereby elect to
18 sue Defendants for the benefit of all.

19 635. *Numerosity.* The proposed class is so numerous that joinder of all of the members
20 is impractical. Over 1604 residences, commercial structures or outbuildings were destroyed,
21 creating a potential of over 1604 plaintiffs who had real or personal property that was destroyed.
22 Hundreds of additional buildings, residences and structures and personal property was damaged.
23 Some members also sustained bodily injury or had loved ones who sustained fatal injuries as a
24 result of the Carr Fire. Given the large number of potential plaintiffs, the proposed class is
25 practical and necessary in this case.

26 636. *Ascertainable.* The class is ascertainable. The Class definition identifies groups of
27 unnamed plaintiffs by describing a set of common characteristics sufficient to allow a member of
28 that group to self-identify as having a right to recover based on the description. Other than by

1 direct notice, alternatively proper and sufficient notice of this action may be provided to the
2 Class members through notice disseminated by electronic means, through broadcast media, and
3 published in newspapers or other publications.

4 637. *Common Questions of Law and Fact and Predominance.* A well-defined
5 community of interest in questions of law or fact involving and affecting all members of the
6 Class exist, and common questions of law or fact are substantially similar and predominate over
7 questions that may affect only individual Class members. This action is amenable to a class-
8 wide calculation of damages, or the establishment of fair and equitable formulae for determining
9 and allocation damages, through expert testimony applicable to anyone in the Class. The most
10 significant questions of law and fact that will decide the Carr Fire litigation are questions
11 common to the Class, or to definable categories of subclass thereof, and can be answered by the
12 trier of fact in a consistent manner such that all those similarly situated are similarly treated in
13 the litigation. The questions of law and fact common to the Plaintiffs and Class members,
14 include, among other things, the following:

- 15 a. Whether the dangerous condition created by the STATE, by failing to
16 properly maintain SR-299 and keeping the roadway and property adjacent to
17 the roadway free of vegetation or other debris that could result in a wildfire
18 starting on or near SR-299 as set forth *infra* (paragraphs 644-662) was a
19 substantial factor in causing plaintiffs' harm;
- 20 b. Whether the dangerous condition created by the CITY, by failing to comply
21 with the Mitigation Plan and engaging in the acts, omissions and failures set
22 forth *infra*, (paragraphs 666-679) was a substantial factor in causing
23 plaintiffs' harm;
- 24 c. Whether the occurrence of the Carr Fire resulted in an unconstitutional taking
25 of private property without just compensation of plaintiffs' property; and
26 whether defendants should be required to compensate the owners for the
27 taking of their property;
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- d. Whether the destruction and damage to property and timber owned by the members of the class constituted a trespass to property or timber, and whether the acts or omissions defendants was a substantial factor in said trespass;
- e. Whether the Carr Fire interfered with or continues to interfere with the Class members comfortable enjoyment of their lives and factories, and whether the acts or omissions defendants was a substantial factor in causing the public or private nuisance;
- f. The extent to which the Class Members have been harmed by the Carr Fire;
- g. The proper measure of damages for plaintiffs and the class.

638. *Typicality.* Plaintiffs' claims are typical of the claims of all the members of the classes. Plaintiffs' claims are based on the same legal theories as the claims of all the members of the classes.

639. *Adequacy of Representation.* Plaintiffs can and will fairly and adequately represent and protect the interests of all the members of the classes because plaintiffs' claims are typical of their claims, and plaintiffs have no interests that conflict with or are antagonistic to their interests.

640. *Superiority.* A class action is superior to any other available method for the fair and efficient adjudication of this controversy because:

- a. Common questions of law and fact predominate over any individual questions that may arise,
- b. Class litigation is the most efficient means by which this controversy can be adjudicated.
- c. Defendants have acted on grounds generally applicable to the class, thereby making appropriate final relief with respect to the class as a whole.

641. The class action is superior to all other available methods for the fair and efficient adjudication of this case or controversy. Even if any individual persons or group(s) of Class members can afford individual litigation, individual litigation of all claims would be unduly

1 burdensome to the courts in which the individual litigation(s) would proceed. The class action
2 device is preferable to individual litigation(s) because it provides the benefits of unitary and
3 inclusive adjudication, economies of scale, and comprehensive adjudication by a single court.

4 642. Prosecution of separate actions by individual Class members would create a risk
5 of inconsistent or varying adjudications with respect to individual Class members that would
6 establish incompatible standards of conduct for the party (or parties) opposing the Class lead to
7 the underinclusive, inconsistent or otherwise inequitable allocation of Defendants' available
8 assets and insurance among similarly situated claimants and would lead to repetitious trials of
9 numerous common questions of fact and law. Plaintiffs knows of no difficulty that will be
10 encountered in the management of this litigation that would preclude its maintenance as a class
11 action. As a result, a class action is superior to other available methods for the fair and efficient
12 adjudication of this controversy.

13
14 **FIRST CAUSE OF ACTION**

15 **(Dangerous Condition of Property)**

16 **(By the STATE Plaintiffs ONLY)**

17 **(As to Defendants STATE OF CALIFORNIA; STATE OF CALIFORNIA,**

18 **DEPARTMENT OF TRANSPORTATION, and DOES 1 – 250 ONLY)**

19 The Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint*
20 *for Damages* as though fully set forth herein.

21 643. This cause of action is brought by the STATE Plaintiffs on behalf of themselves,
22 and all other similarly situated, against defendants STATE.

23 644. The STATE Plaintiffs are informed and believe and thereon allege that
24 defendant STATE manages approximately 15,000 miles of highway and more than 230,000
25 acres of right-of-way throughout California.

26 645. SR-299 is a state highway in the State of California that runs across the northern
27 part of the State. SR-299 starts at US 101 at the northern edge of Arcata and continues in an
28 easterly direction to the Nevada state line. A portion of SR-299 passes through the
Whiskeytown National Recreation Area and the City of Redding in Shasta County. As such,

1 defendant STATE owns, has an easement over, or right-of-way through, and therefore right to
2 control, that portion of the roadway travelling through the Whiskeytown National Recreation
3 Area, and is responsible for the control and maintenance of vegetation on SR-299 and the
4 adjacent shoulders.

5 646. At all times pertinent hereto, defendant STATE owned, controlled, or was
6 otherwise responsible for the regulation, control, supervision, repair or maintenance of the
7 shoulder and right of way of SR-299 on either side of SR-299.

8 647. The State of California has recognized that the California Department of
9 Transportation is responsible for controlling and maintaining vegetation on the shoulder of and
10 in the right of way for State highways and, in fact, requires the Department to have a vegetation
11 control plan in place. Defendants have recognized that the need for vegetation control is driven
12 primarily by safety issues, and, in particular, fire concerns. The State has routinely recognized
13 that control of vegetation on the right of way of State highways is essential to reducing fire risk.

14 648. The STATE Plaintiffs are informed and believe and thereon allege that the
15 Caltrans vegetation control policy was developed by statewide committee in 1987 and required
16 a clear strip on either side of pavement edges to control risk of fire.

17 649. The State of California has recognized that vegetation should be controlled,
18 where necessary, for fire prevention and safety and that removal of vegetation includes not only
19 the roadways, but also the right of way, especially shoulders and medians.

20 650. The STATE Plaintiffs are informed and believe and thereon allege that
21 defendant STATE knew or should have known that Shasta and Trinity counties face a very high
22 risk of wild fire due to the long hot summers, the high fuel load which is dried by those
23 summers, and the steep terrain.

24 651. The STATE Plaintiffs are informed and believe and thereon allege that
25 defendant STATE knew or should have known that:

- 26
- The hills and mountains surrounding the westerly portion of the City of Redding
27 are covered mostly with grasses, brush, Manzanita, oak trees and grey pines;
 - Summer drought causes vegetation to become extremely dry in Shasta County;
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- The dry vegetation coupled with strong northerly winds in Shasta County can aggravate an already very hazardous fire situation;
- Wildfires can quickly become uncontrolled and spread through vegetative fuels and expose and possibly consume structures;
- Wildfires are ignited 90% of the time by human action;
- Over 1/3 (one-third) of all wildland fires originate alongside roads and highways, probably as a result of equipment failure or cigarettes or matches being thrown by passing automobiles;
- That wildfires can be ignited by sparks from off-road vehicles, construction equipment and other power-driven equipment used for residential and recreational purposes;
- That 39 percent of the City of Redding is identified as a very high fire severity zone, particularly the west side of Redding due to fuel and topography;

652. The STATE Plaintiffs are informed and believe and thereon allege that the risk of wildfires originating on the side of the road was, at all times pertinent hereto, and is foreseeable to defendant STATE. It is further foreseeable that vehicles will pull off the travelled way onto the shoulder for a variety of reasons, such as mechanical issues, drowsiness, etc., and that the various parts of a vehicle can get hot enough to ignite vegetation near the roadway, such as brakes, catalytic converters, chains hanging from trailers, mechanical failures, etc.

653. Due to the high risk of fire in Shasta and Trinity counties, and given the high risk of fires in the right of way of highways, defendant STATE had an obligation to mitigate the potential and severity, and the possibility of property damage and loss of life due to fires by properly controlling vegetation on shoulders.

654. The STATE Plaintiffs are informed and believe and thereon allege that defendant STATE failed to comply with its obligations under the law, and otherwise created a dangerous condition of property by, and including the following acts or omissions:

- Failing to adequately assess the risk of harm of fire along its rights-of-way;

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- Failing to adequately consider the risk that a fire starting on the shoulder of SR-299 in the Whiskeytown National Recreation area would, due to surrounding terrain, fuel load and high ambient temperature, rapidly spread and become uncontrollable;
- Failing to establish adequate fire prevention measures;
- Failing to comply with the Vegetation Control Plan;
- Failing to educate the public about wildland fire dangers and steps that can be taken to prevent or minimize their effects;
- Failing to reduce the potential for destructive actions of the fire once ignition occurs;
- Negligently inspecting, maintaining and controlling SR-299 and the portion of land adjacent thereto, in a manner that allowed or permitted brush and vegetation in the right of way to border the subject roadway, increasing the risk of a wildfire starting alongside the roadway;
- Failing to maintain or create sufficient fire breaks;
- Failing to create adequate fire safety management practices;
- Failing to comply with fire safety management practices;
- Failing to properly assess, monitor, inspect, trim, cut, maintain or manage vegetation surrounding and in close proximity to roads on rights-of-way, including SR-299;
- Failing to conduct adequate, proper and frequent inspections of its roads and right-of- ways, including SR-299 for potential hazards;
- Failing to design, construct, install, operate, repair, monitor or maintain its roads and right-of-ways including SR-299, in a manner that is safe under the surrounding conditions and in a manner that avoids igniting fires or the spread of fires, especially during long dry seasons and high winds, such as those that face Shasta County.

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- Failing to conduct adequate, proper and frequent inspections of fire-prone areas, such as the Whiskeytown National Recreation Area;
- Failing to properly hire, train, and supervise employees, independent contractors, and agents responsible for the control and maintenance of its roads and right-of-ways, including SR-299;
- Failing to properly hire, train, and supervise employees, independent contractors, and agents responsible for the control and maintenance of vegetation adjacent to its roads and right-of-ways, including SR-299;
- Failing to implement and follow reasonably prudent practices of vegetation control and maintenance;
- Failing to implement and follow reasonably prudent practices to avoid fire ignition alongside roads and right-of-ways;
- Failing to comply with applicable statutes, regulations and standards enacted to protect against the type of harm suffered by Plaintiffs;
- Failing to warn the public of the danger and unsafe condition.

655. As a result, defendant STATE's property was in a dangerous condition as defined by California Government Code Sections 830 et. seq.

656. The STATE Plaintiffs are informed and believe and thereon allege that at all times pertinent hereto, defendant STATE owned, controlled, maintained, supervised, and had the power to prevent, remedy and guard against the dangerous condition (i.e. vegetation) along SR-299 that allowed the fire to start and spread.

657. Defendant STATE, or its employee(s) or agent(s) had mandatory or non-delegable duties to maintain and control vegetation and potential fire fuel sources alongside SR-299, and to repair any dangerous conditions of which they had actual or constructive knowledge.

658. At all times pertinent hereto, defendant STATE or its agents or employees negligently designed, constructed, controlled, supervised, operated, inspected, repaired, maintained, modified or regulated SR-299 and the area adjacent to the roadway by engaging in

1 the acts, omissions and failures set forth above. This conduct resulted in a dangerous condition
2 of property owned or controlled by the State of California.

3 659. Said dangerous condition was a trap for unwary real and personal property
4 owners in Shasta and Trinity counties, and the risk was not reasonably apparent to, and, in the
5 exercise of due care, could not be anticipated by the people in Shasta and Trinity counties.

6 660. The aforesaid dangerous condition created a reasonably foreseeable and
7 substantial risk of injury or death to people in Shasta and Trinity counties.

8 661. Defendants had advance notice of and knew, or, in the exercise of ordinary and
9 reasonable care, should have known, of the aforesaid dangerous condition but failed to correct
10 the same.

11 662. The dangerous condition had existed, and defendant STATE had notice of the
12 dangerous condition for a sufficient period of time prior to the subject incident so that
13 respondent or its employee(s) or agent(s), in the exercise of due care, should have discovered
14 the dangerous condition and acted to remedy same.

15 663. As a direct and proximate result of the dangerous condition, and acts, omissions
16 or conduct of defendant STATE, plaintiffs sustained the following damages, all to the STATE
17 Plaintiffs damage in an amount greatly in excess of the minimum jurisdiction of this Court, in
18 an amount subject to proof at the time of trial, including but not limited to,

- 19 a. Destruction to real property;
- 20 b. Damage to real property;
- 21 c. Destruction to personal property;
- 22 d. Damage to personal property;
- 23 e. Repair, depreciation and/or replacement of damaged, destroyed and/or lost
24 personal and/or real property;
- 25 f. Bodily injury, requiring medical care, physicians and surgeons,
- 26 g. Loss of wages and future wages
- 27 h. Loss of earning capacity

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- i. Loss of use, benefit, goodwill and enjoyment of plaintiffs' real and personal property;
- j. Loss of revenue, lost profits, and damage to business reputation and goodwill,
- k. Cost of destroyed landscaping, and cost of irrigation system repair and replacements;
- l. Clean-up costs,
- m. Loss of business opportunities
- n. Delay costs and consequential damages,
- o. Emotional distress, discomfort and annoyance caused by the Carr Fire, and ongoing emotional distress caused by the continuing threat of wildfires, as permitted by law,
- p. Increased and continuing erosion problems as a result of the loss of vegetation on the hills surrounding Plaintiffs' property,
- q. Increased risk of further property damage and potential personal injuries, as well as increased insurance rates, and
- r. Reduction in the value of the Plaintiffs' property;
- s. Reduction in the value of the plaintiff's business.

664. The STATE Plaintiffs are informed and believe and thereon allege that employees and/or agents of defendants STATE, and each of them, are negligent or in some other way responsible for acts and/or omissions that created the dangerous condition, which acts and/or omissions are unknown to plaintiff at the present time. The STATE Plaintiffs will seek leave of Court to amend this complaint at such time as plaintiff discovers the other acts and/or omissions of said defendants constituting such negligence.

SECOND CAUSE OF ACTION
(By the CITY Plaintiffs ONLY)
(Dangerous Condition of Property)

(As to Defendant CITY OF REDDING, and DOES 250-500)

Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for Damages* as though fully set forth herein.

1 665. This cause of action is brought by the CITY Plaintiffs on behalf of themselves,
2 and all other similarly situated, against defendant CITY.

3 666. On or about September 16, 2014, defendant CITY OF REDDING (hereinafter
4 “Defendant CITY”) adopted Resolution 2014-095, a “Local Hazard Mitigation Plan Update”,
5 (hereinafter “the Resolution” or “the Mitigation Plan”), which is effective for a period of five
6 years. This Resolution allowed Defendant CITY to continue to be eligible for project grants
7 under FEMA’s hazard mitigation assistance programs.

8 667. As part the Mitigation Plan, Defendant CITY recognized “the consequences of
9 disasters and the need to reduce impacts of natural – and human – caused hazards”; the “toll on
10 families, individuals, and businesses can be immense after disaster, both emotionally and
11 economically”; and the considerable “time, money and emotional effort to respond and recover
12 from these disasters diverting public resources and attention from other important programs and
13 problems.”

14 668. Further, as part of the Mitigation Plan, twelve specific hazards were identified
15 that face the City of Redding. According to the rank order, wildfires were listed as the primary
16 risk facing the City of Redding, due to past events experienced by the City and because the City
17 encompasses – and is adjacent to – many natural open-space areas. The Mitigation Plan further
18 recognized that:

- 19 • The hills and mountains surrounding the westerly portion of the City are covered mostly
20 with grasses, brush, Manzanita, oak trees and grey pines;
- 21 • Summer drought causes vegetation to become extremely dry;
- 22 • The dry vegetation coupled with strong northerly winds can aggravate an already very
23 hazardous fire situation;
- 24 • Wildfires can quickly become uncontrolled and spread through vegetative fuels and
25 expose and possibly consume structures;
- 26 • 90-percent of the time, wildfires are ignited by human action;

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- Over one-third of all wildland fires originate alongside roads and highways, probably as a result of equipment failure or cigarettes or matches being thrown by passing automobiles;
- That wildfires can be ignited by sparks from off-road vehicles, construction equipment and other power-driven equipment used for residential and recreational purposes;
- That 39-percent of the City of Redding is identified as a very high fire severity zone, particularly the west side of Redding due to fuel and topography.

669. The CITY Plaintiffs are informed and believe and thereon allege, that the risk of wildfires starting outside City limits and burning hot and fast into the City was at all times pertinent hereto, and is, foreseeable if defensible spaces are not maintained and fuel loads are not reduced.

670. Because of the high risk of fire in the City of Redding, due to fuel loads and topography, Defendant CITY was required to, in part, mitigate the potential and severity, and the possibility of property damage and loss of life due to wildland fires.

671. The CITY Plaintiffs are informed and believe and thereon allege that Defendant CITY failed to comply with its obligations under the Mitigation Plan, or otherwise created a dangerous condition of property by, and including, the following acts or omissions:

- Failing to ensure that adequate defensible space was being provided for all new and existing homes;
- Failing to continue the development of landscape maintenance districts for new developments to fund ongoing fuel reduction and maintenance of defensible space;
- Failing to educate the public about wildland fire dangers and steps that can be taken to prevent or minimize their effects;
- Failing to reduce the potential for destructive actions of the fire once ignition occurs;
- Failing to utilize fire pre-plans;
- Failing to ensure a properly trained, staffed and equipped emergency response team;
- Failing to provide clear communication to the public as to when evacuation was required;

- 1 • Failing to properly maintain, such as removing dry trees, brush, vegetation and other
2 potential vegetative fuel sources;
- 3 • Failing to require individual landowners to create and maintain defensible space on and
4 around their property and keep fuel loads down.

5 672. As a result, Defendant CITY's property was in a dangerous condition as defined
6 by California Government Code Sections 830, et seq.

7 673. The CITY Plaintiffs are informed and believe and thereon allege that at all times
8 pertinent hereto, Defendant CITY owned, controlled, maintained, supervised, and had the
9 power to prevent, remedy and guard against the dangerous and defective condition that allowed
10 the Carr Fire to spread into the City limits.

11 674. Defendant CITY, or its employee(s) or agent(s) had mandatory or non-delegable
12 duties to comply with the Mitigation Plan and to repair any dangerous conditions of which they
13 had actual or constructive knowledge.

14 675. At all times pertinent hereto, defendant CITY's agents or employees negligently
15 designed, constructed, controlled, supervised, operated, inspected, repaired, maintained,
16 modified or regulated property in the City of Redding, by failing to comply with the Mitigation
17 Plan and engaging in the acts, omissions and failures set forth above. This conduct resulted in a
18 dangerous condition of property owned or controlled by Defendant CITY.

19 676. Said dangerous condition was a trap for unwary real and personal property
20 owners in the City of Redding, and the risk was not reasonably apparent to, and, in the exercise
21 of due care, could not be anticipated by members of the general public in the City of Redding.

22 677. The aforesaid dangerous condition created a reasonably foreseeable and
23 substantial risk of physical and emotional injury or death to people in the City of Redding.

24 678. Defendant CITY had advance notice of and knew of the aforesaid dangerous
25 condition of property in the City of Redding but failed to correct the same.

26 679. The dangerous condition had existed and defendant CITY had notice of the
27 dangerous condition for a sufficient period of time prior to the subject incident so that its
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1 employee(s) or agent(s), in the exercise of due care, should have discovered the dangerous
2 condition and acted to remedy the same.

3 680. As a direct and proximate result of the dangerous condition, and acts, omissions
4 or conduct of defendant CITY, plaintiffs sustained the following damages, all to the CITY
5 Plaintiffs damage in an amount greatly in excess of the minimum jurisdiction of this Court, in
6 an amount subject to proof at the time of trial, including but not limited to,

- 7 a. Destruction to real property;
- 8 b. Damage to real property;
- 9 c. Destruction to personal property;
- 10 d. Damage to personal property;
- 11 e. Repair, depreciation and/or replacement of damaged, destroyed and/or lost
12 personal and/or real property;
- 13 f. Bodily injury, requiring medical care, physicians and surgeons,
- 14 g. Loss of wages and future wages
- 15 h. Loss of earning capacity
- 16 i. Loss of use, benefit, goodwill and enjoyment of plaintiffs' real and personal
17 property;
- 18 j. Loss of revenue, lost profits, and damage to business reputation and goodwill,
- 19 k. Cost of destroyed landscaping, and cost of irrigation system repair and
20 replacements;
- 21 l. Clean-up costs,
- 22 m. Loss of business opportunities
- 23 n. Delay costs and consequential damages,
- 24 o. Emotional distress, discomfort and annoyance caused by the Carr Fire, and
25 ongoing emotional distress caused by the continuing threat of wildfires, as
26 permitted by law,
- 27 p. Increased and continuing erosion problems as a result of the loss of vegetation
28 on the hills surrounding Plaintiffs' property,

- 1 q. Increased risk of further property damage and potential personal injuries, as
2 well as increased insurance rates, and
3 r. Reduction in the value of the Plaintiffs' property;
4 s. Reduction in the value of the plaintiff's business.

5 681. The CITY Plaintiffs are informed and believe and thereon allege that employees
6 and/or agents of defendants CITY is negligent or in some other way responsible for acts and/or
7 omissions that created the dangerous condition, which acts and/or omissions are unknown to
8 plaintiff at the present time. The CITY Plaintiffs will seek leave of Court to amend this
9 complaint at such time as plaintiff discovers the other acts and/or omissions of said defendants
10 constituting such negligence.

11 **THIRD CAUSE OF ACTION**

12 **(Inverse Condemnation)**

13 **(By the STATE Plaintiffs and the CITY Plaintiffs)**

14 **(As to All Defendants and DOES 1-500)**

15 Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for*
16 *Damages* as though fully set forth herein.

17 682. This cause of action is brought by the STATE Plaintiffs and the CITY Plaintiffs
18 on behalf of themselves, and all other similarly situated, against all defendants.

19 683. Plaintiffs are informed and believe and thereon allege, that defendants, and each
20 of them, owned, controlled, maintained, supervised, and had the power to prevent, remedy and
21 guard against the dangerous conditions that allowed the fire to start and spread.

22 684. The CITY Plaintiffs are informed and believe and thereon allege, that the risk of
23 wildfires starting outside City of Redding limits and burning hot and fast into the City of
24 Redding and surrounding cities, counties and towns, was at all times pertinent hereto,
25 foreseeable if defensible spaces are not maintained and fuel loads are not reduced. Because of
26 the high risk of fire due to fuel loads and topography, Defendants, and each of them, were
27 required to, in part, mitigate the potential and severity, and the possibility of property damage
28 and loss of life due to wildland fires.

685. The STATE Plaintiffs are informed and believe and thereon allege that, at all

1 times pertinent hereto, defendant STATE owned, controlled, or was otherwise responsible for
2 the regulation, control, supervision, repair or maintenance of the shoulder and right of way of
3 SR-299 on either side of SR-299, which included control and maintenance of the vegetation on
4 or adjacent to SR-299.

5 686. The STATE Plaintiffs are informed and believe and thereon allege that
6 defendant STATE failed to comply with its obligations under the law, and otherwise created a
7 dangerous condition of property by, the acts or omissions set forth in paragraphs 644-662
8 above.

9 687. Further, the CITY Plaintiffs are informed and believe and thereon allege that
10 Defendant CITY failed to comply with its obligations under the Mitigation Plan, or otherwise
11 created a dangerous condition of property by, and including, the acts or omissions, set forth in
12 paragraphs 666-679 above.

13 688. Article 1, Section 19 of the California Constitution states: Private property may
14 be taken or damaged for public use only when just compensation, ascertained by a jury unless
15 waived, has first been paid to, or into court for, the owner. The Legislature may provide for
16 possession by the condemnor following commencement of eminent domain proceedings upon
17 deposit in court and prompt release to the owner of money determined by the court to be the
18 probable amount of just compensation.

19 689. The Fifth Amendment of the United States Constitution states: "No person shall .
20 . . be deprived of life, liberty, or property, without due process of law; nor shall private property
21 be taken for public use, without just compensation."

22 690. Based on the acts, omissions or failures set forth in the First and Second Causes
23 of Action, (paragraphs 644-662 and 666-679, respectively) defendants, and each of them, failed
24 to properly maintain its property and take steps to prevent or reduce the risk of wildfires,
25 thereby, causing or permitting the occurrence of the disabled vehicle that started the Carr Fire
26 and the subsequent spread of the fire throughout Shasta and Tehama counties.

27 691. In doing the things herein alleged, defendants have in effect condemned the
28 plaintiffs' property rights for public use and benefit.

1 698. Defendants STATE intentionally, although not intending to do so, recklessly or
2 negligently entered plaintiffs' property by failing to prevent, remedy and guard against the
3 dangerous conditions that allowed the Carr Fire to start and spread through Shasta and Tehama
4 Counties.

5 699. Defendant CITY, intentionally, although not intending to do so, recklessly or
6 negligently entered plaintiffs' property by failing to prevent, remedy and guard against the
7 dangerous conditions that allowed the Carr Fire to spread into the City of Redding.

8 700. Plaintiffs did not give permission for this entry.

9 701. Plaintiffs suffered harm from Defendants' conduct.

10 702. As a result of this unauthorized entry, plaintiffs sustained damage or destruction
11 of real and personal property due to the Carr Fire.

12 703. Defendants' actions were a substantial in causing the harm to Plaintiffs, including
13 the harm of diminished market values to their properties.

14 704. As a direct and proximate result of the dangerous condition, and acts, omissions
15 or conduct of defendants, and each of them plaintiffs sustained the damages set forth in
16 paragraphs 663 and 680 above, in an amount greatly in excess of the minimum jurisdiction of
17 this Court, in an amount subject to proof at the time of trial.

18 705. As a further direct and legal result of the wrongful conduct of defendants, and
19 each of them, plaintiffs whose land was under cultivation, and/or was used for raising livestock
20 or was intended to be used for raising livestock, are entitled to recover all attorney's fees, expert
21 fees, consultant fees, and litigation costs and expenses, as allowed under Code of Civil
22 Procedure § 1021.9.

23 706. Plaintiffs are informed and believe and thereon allege that employees and/or
24 agents of defendants, and each of them, are in some other way responsible for acts and/or
25 omissions that resulted in the inverse condemnation and taking of plaintiffs' property, which
26 acts and/or omissions are unknown to plaintiffs at the present time. Plaintiffs will seek leave of
27 Court to amend this complaint at such time as plaintiffs discover the other acts and/or omissions
28 of said defendants.

1 **FIFTH CAUSE OF ACTION**

2 **(Timber Trespass)**

3 **(By the STATE Plaintiffs and the CITY Plaintiffs)**

4 **(As to All Defendants and DOES 1-500)**

5 Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for*
6 *Damages* as though fully set forth herein.

7 707. This cause of action is brought by the STATE Plaintiffs and the CITY Plaintiffs
8 on behalf of themselves, and all other similarly situated, against all defendants.

9 708. The STATE Plaintiffs and informed and believe and thereon allege that,
10 Defendants STATE although not intending to do so, recklessly or negligently entered plaintiffs'
11 property by failing to prevent, remedy and guard against the dangerous conditions that allowed
12 the Carr Fire to start and spread through Shasta and Tehama Counties, which resulted in the
13 damage or destruction to trees on plaintiffs' property.

14 709. The CITY Plaintiffs are informed and believe and thereon allege that, Defendant
15 CITY, although not intending to do so, recklessly or negligently entered plaintiffs' property by
16 failing to prevent, remedy and guard against the dangerous conditions that allowed the Carr Fire
17 to spread through the City of Redding, which resulted in the damage or destruction to trees on
18 plaintiffs' property.

19 710. Plaintiffs did not give permission to defendants, to damage, destroy or take the
20 trees or timber.

21 711. As a result of this unauthorized entry, plaintiffs sustained damage or destruction
22 to their trees or timber.

23 712. Defendants' actions were a substantial in causing the harm to Plaintiffs.

24 713. As a direct and legal result of the conduct of defendants, plaintiffs seek double
25 damages for injuries to trees or timber on Plaintiffs' property as allowed under Code of Civil
26 Procedure § 733.

27 714. As a further direct and legal result of the conduct of defendants, plaintiffs seek
28 double damages for the negligent, willful, and wrongful injuries to timber, trees, or underwood
on their property, as allowed under Civil Code § 3346.

1 722. The CITY Plaintiffs are informed and believe and thereon allege, that defendant
2 CITY, owned, controlled, maintained, supervised, and had the power to prevent, remedy and
3 guard against the dangerous conditions that allowed the fire to spread into the City of Redding.

4 723. The CITY Plaintiffs are informed and believe and thereon allege that defendant
5 CITY, failed to comply with its obligations under the law, and otherwise created a dangerous
6 condition of property by, by the acts, omissions and failures set forth in the First Cause of
7 Action, at paragraphs 666-679, which resulted in a fire hazard to plaintiffs' property.

8 724. The Carr Fire further created air quality that was harmful to the public's health.

9 725. The Carr Fire further destroyed, damages, obstructed or otherwise interfered
10 with the public's comfortable enjoyment of life and property.

11 726. Further, the Carr Fire affected a substantial number of people at the same time.
12 More specifically, as a result of the Carr Fire, plaintiffs are informed and believe, and thereon
13 allege, that at least 1,079 residences, 22 commercial structures and 503 outbuildings were
14 destroyed. Moreover, hundreds of additional residences, commercial structures and outbuildings
15 were damaged. Additionally, the Carr Fire destroyed or damaged personal property of
16 plaintiffs. Finally, many of the plaintiffs sustained emotional damage, bodily injury or had
17 loved ones who suffered fatal injuries as a result of the Carr Fire.

18 727. The condition was such that an ordinary person would be reasonably annoyed or
19 disturbed by the condition.

20 728. The seriousness of wildfires and harm caused by wildfires outweighs the social
21 utility, if any, of defendants' conduct, acts or omissions.

22 729. Plaintiffs did not consent to defendants' conduct, act or omissions.

23 730. The harm that plaintiffs suffered was different from the type of harm suffered by
24 the general public who did not lose property or were not affected by the Carr Fire.

25 731. Defendants, and each of their conduct, acts or omissions as set forth in the First
26 and Second causes of action, was a substantial factor in causing plaintiffs' harm.

27 732. As a direct and proximate result of the dangerous condition, and acts, omissions
28 or conduct of defendants, and each of them, plaintiffs sustained the damages set forth in

1 paragraphs 663 and 680 above, in an amount greatly in excess of the minimum jurisdiction of
2 this Court, in an amount subject to proof at the time of trial.

3 733. Plaintiffs are informed and believe and thereon allege that employees and/or
4 agents of defendants, and each of them, are in some other way responsible for acts and/or
5 omissions that resulted in the public nuisance, which acts and/or omissions are unknown to
6 plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such
7 time as plaintiffs discover the other acts and/or omissions of said defendants.

8 **SEVENTH CAUSE OF ACTION**

9 **(Private Nuisance)**

10 **(By the STATE Plaintiffs and the CITY Plaintiffs)**

11 **(As to All Defendants and DOES 1-500)**

12 Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for*
13 *Damages* as though fully set forth herein.

14 734. This cause of action is brought by the STATE Plaintiffs and the CITY Plaintiffs
15 on behalf of themselves, and all other similarly situated, against all defendants.

16 735. The STATE Plaintiffs are informed and believe and thereon allege, that
17 defendants, STATE owned, controlled, maintained, supervised, and had the power to prevent,
18 remedy and guard against the dangerous conditions that allowed the fire to start and spread.

19 736. The STATE Plaintiffs are informed and believe and thereon allege that
20 defendants STATE failed to comply with its obligations under the law, and otherwise created a
21 dangerous condition of property by, by the acts, omissions and failures set forth in the First
22 Cause of Action, see paragraphs 644-662, which resulted in a fire hazard to plaintiffs' property.

23 737. The CITY Plaintiffs are informed and believe and thereon allege, that defendant
24 CITY, owned, controlled, maintained, supervised, and had the power to prevent, remedy and
25 guard against the dangerous conditions that allowed the fire to spread into the City of Redding.

26 738. The CITY Plaintiffs are informed and believe and thereon allege that defendant
27 CITY, failed to comply with its obligations under the law, and otherwise created a dangerous
28 condition of property by, by the acts, omissions and failures set forth in the First Cause of
Action, at paragraphs 666-679, which resulted in a fire hazard to plaintiffs' property.

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739. The Carr Fire created air quality that was harmful to the public's health.

740. Further, the Carr Fire destroyed, damages, obstructed or otherwise interfered with the public's comfortable enjoyment of life and property.

741. The condition was such that an ordinary person would be reasonably annoyed or disturbed by the condition.

742. Plaintiffs did not consent to defendants' conduct, act or omissions.

743. Defendants, and each of their conduct, acts or omissions as set forth in the First and Second causes of action, was a substantial factor in causing plaintiffs' harm.

744. As a direct and proximate result of the dangerous condition, and acts, omissions or conduct of defendants, and each of them, plaintiffs sustained the damages set forth in paragraphs 663 and 680 above, in an amount greatly in excess of the minimum jurisdiction of this Court, in an amount subject to proof at the time of trial.

745. Plaintiffs are informed and believe and thereon allege that employees and/or agents of defendants, and each of them, are in some other way responsible for acts and/or omissions that resulted in the private nuisance, which acts and/or omissions are unknown to plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such time as plaintiffs discover the other acts and/or omissions of said defendants.

EIGHTH CAUSE OF ACTION

(Conversion)

(By the STATE Plaintiffs and the CITY Plaintiffs)

(As to All Defendants and DOES 1-500)

Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for Damages* as though fully set forth herein.

746. This cause of action is brought by the STATE Plaintiffs and the CITY Plaintiffs on behalf of themselves, and all other similarly situated, against all defendants.

747. The STATE Plaintiffs are informed and believe and thereon allege that Defendants STATE substantially interfered with plaintiffs' tangible property by failing to comply with their obligations under the law, and otherwise creating a dangerous condition of

1 property by, by the acts, omissions and failures set forth in the First Cause of Action, see
2 paragraphs 644-662, which resulted in a fire hazard to plaintiffs' property.

3 748. The CITY Plaintiffs are informed and believe and thereon allege that Defendants
4 CITY substantially interfered with plaintiffs' tangible property by failing to comply with their
5 obligations under the law, and otherwise creating a dangerous condition of property by, by the
6 acts, omissions and failures set forth in the Second Cause of Action, see paragraphs 666-679,
7 which resulted in a fire hazard to plaintiffs' property.

8 749. By engaging in the acts aforesaid, defendants, and each of them, were a
9 substantial factor in causing the Carr Fire, which destroyed plaintiffs' tangible property, and/or
10 prevented plaintiffs from having access to their tangible property.

11 750. Plaintiffs did not consent to this conversion of property.

12 751. Defendants, and each of their conduct, acts or omissions as set forth in the First
13 and Second causes of action was a substantial factor in causing plaintiffs' harm.

14 752. As a direct and proximate result of the dangerous condition, and acts, omissions
15 or conduct of defendants, and each of them, plaintiffs sustained the damages set forth in
16 paragraphs 663 and 680 above, in an amount greatly in excess of the minimum jurisdiction of
17 this Court, in an amount subject to proof at the time of trial.

18 753. Plaintiffs are informed and believe and thereon allege that employees and/or
19 agents of defendants, and each of them, are in some other way responsible for acts and/or
20 omissions that resulted in the public nuisance, which acts and/or omissions are unknown to
21 plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such
22 time as plaintiffs discover the other acts and/or omissions of said defendants.

23 **NINETH CAUSE OF ACTION**

24 **(Negligent Infliction of Emotional Distress)**

25 **(By the STATE Plaintiffs and the CITY Plaintiffs)**

26 **(As to All Defendants and DOES 1-500)**

27 Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for*
Damages as though fully set forth herein.

28 754. This cause of action is brought by the STATE Plaintiffs and the CITY Plaintiffs

1 on behalf of themselves, and all other similarly situated, against all defendants.

2 755. As set forth above, (First and Second Causes of Action) the Carr Fire and the
3 ensuing damage were a direct, foreseeable, proximate and legal result of the acts or omissions of
4 defendants STATE and CITY.

5 756. As a result of the wrongful acts and omissions of defendants, and each of them,
6 the STATE and CITY plaintiffs suffered serious emotional distress. As set forth herein, plaintiffs
7 suffered from damage to and/or loss of real and/or personal property while they were evacuating
8 from the Carr Fire. Defendants knew or should have known that plaintiffs would suffer serious
9 emotional distress during and as a result of their wrongful acts and/or omissions and the ensuing
10 Carr Fire due to their property damages and/or other damages. Defendants, and each of their,
11 wrongful acts and omissions were a substantial factor in causing plaintiffs' serious emotional
12 distress.

13 757. As a direct and legal result of the wrongful acts and omissions of defendants, and
14 each of them, plaintiffs have suffered and will continue to suffer great mental pain and suffering,
15 including emotional suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock,
16 humiliation, embarrassment, shame, and other emotional distress. Plaintiffs are informed and
17 believe, and upon such information and belief allege, that such injuries have resulted in
18 debilitating injuries in an amount according to proof at trial.

19 758. Plaintiffs are informed and believe and thereon allege that employees and/or
20 agents of defendants, and each of them, are in some other way responsible for acts and/or
21 omissions that resulted in the public nuisance, which acts and/or omissions are unknown to
22 plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such
23 time as plaintiffs discover the other acts and/or omissions of said defendants.

24 **TENTH CAUSE OF ACTION**

25 **(Negligent Interference with Prospective Economic Advantage)**

26 **(By the STATE Plaintiffs and the CITY Plaintiffs)**

27 **(As to All Defendants and DOES 1-500)**

28 Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for Damages* as though fully set forth herein.

1 759. This cause of action is brought by the STATE Plaintiffs and the CITY Plaintiffs
2 on behalf of themselves, and all other similarly situated, against all defendants.

3 760. The STATE and CITY Plaintiffs and the Class have existing or prospective
4 economic relationships with citizens of the region impacted by the Carr fire, visitors to the
5 region, and other individuals and organizations in and related to the region.

6 761. These relationships have a reasonably probable likelihood of resulting in future
7 economic benefits or advantages to Plaintiffs and the class.

8 762. Defendants, and each of them, new of should have known of these existing and
9 prospective economic relationships.

10 763. Defendants, and each of them, owed a duty to Plaintiffs and the Class to avoid
11 creating a dangerous condition that would interfere with and adversely affect the existing and
12 prospective economic relationships of Plaintiffs and the Class.

13 764. Defendants, and each of them, breached that duty to Plaintiffs and the Class by,
14 the acts and omissions set forth in the First and Second Causes of Action, paragraphs 644-662
15 and 666-679, respectively.

16 765. Defendants, and each of them, knew or should have known that, if they failed to
17 act with reasonable care, and allowed the dangerous condition to be created and maintained, the
18 existing or prospective economic relationships of Plaintiffs and the Class would be interfered
19 with and disrupted.

20 766. Defendants, and each of them, were negligent and failed to act with reasonable
21 care as set forth herein.

22 767. As a direct and proximate result of defendants, and each of their, acts and
23 omissions, Plaintiffs and the Class have suffered and will suffer economic harm, injury and
24 losses as set forth in paragraphs 663 and 680 above.

25 768. Plaintiffs are informed and believe and thereon allege that employees and/or
26 agents of defendants, and each of them, are in some other way responsible for acts and/or
27 omissions that resulted in the public nuisance, which acts and/or omissions are unknown to
28 plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such

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time as plaintiffs discover the other acts and/or omissions of said defendants.

ELEVENTH CAUSE OF ACTION
(Wrongful Death)
(By SHERRY BLEDSOE and ED BLEDSOE ONLY)
(As to All Defendants and DOES 1-500)

Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for Damages* as though fully set forth herein.

769. Plaintiffs SHERRY BLEDSOE and ED BLEDSOE brings this wrongful death cause of action against defendants, and each of them, on behalf of themselves and all other legal heirs of decedents.

770. JAMES ARNOLD ROBERTS (a minor and son) and EMILY LEANNE ROBERTS (a minor and daughter) were killed as a result of the fire spreading to Quartz Hill Road and the subject property, causing their mother, SHERRY BLEDSOE, and other known legal heirs, including but not limited to JAMES ROBERTS (father), to suffer the loss of decedents' love, companionship, comfort, care, assistance, protection, affection, society and moral support; as well as the value of any financial support that would have been contributed during her lifetime, the loss of gifts or benefits plaintiffs would have been expected to receive, funeral and burial expenses and the reasonable household services decedents would have provided plaintiffs.

771. MELODY BLEDSOE (wife) was killed as a result of the fire spreading to Quartz Hill Road and the subject property, causing plaintiff, ED BLEDSOE, to suffer the loss of decedents' love, companionship, comfort, care, assistance, protection, affection, society and moral support; as well as his wife's enjoyment of sexual relationships and loss of training and guidance; as well as the value of any financial support that would have been contributed during his lifetime, the loss of gifts or benefits plaintiff would have been expected to receive, funeral and burial expenses and the reasonable household services decedents would have provided plaintiff.

772. The fire spread to Quartz Hill, causing decedents to perish, as a direct, proximate, and legal result of STATE's wrongful acts and omissions, as set forth in paragraphs

1 644-662 above, entitling decedent's heirs to damages pursuant to Code of Civil Procedure §
2 377.60, et seq.

3 773. The fire spread to Quartz Hill, causing decedents to perish, as a direct,
4 proximate, and legal result of the CITY's wrongful acts and omissions, as set forth in
5 paragraphs 666-679 above, entitling decedent's heirs to damages pursuant to Code of Civil
6 Procedure § 377.60, et seq.

7 774. Plaintiffs are informed and believe and thereon allege that employees and/or
8 agents of defendants, and each of them, are in some other way responsible for acts and/or
9 omissions that resulted in the public nuisance, which acts and/or omissions are unknown to
10 plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such
11 time as plaintiffs discover the other acts and/or omissions of said defendants.

12 **TWELFTH CAUSE OF ACTION**

13 **(Wrongful Death)**

14 **(By TERRI WEBB ONLY)**

15 **(As to All Defendant STATE and DOES 1-250 ONLY)**

16 Plaintiffs incorporate herein by reference all preceding paragraphs of this *Complaint for*
17 *Damages* as though fully set forth herein.

18 775. Plaintiff TERRI WEBB brings this wrongful death cause of action against
19 defendants STATE on behalf of herself and all other legal heirs of decedents.

20 776. MICHAEL O'SHEA, Terri's husband, died as a result of complications caused by
21 the Carr Fire, from which he could not recover, causing TERRI WEBB to suffer the loss of
22 decedent's love, companionship, comfort, care, assistance, protection, affection, society and
23 moral support; as well as the value of any financial support that would have been contributed
24 during her lifetime, the loss of gifts or benefits plaintiffs would have been expected to receive,
25 funeral and burial expenses and the reasonable household services decedent would have
26 provided plaintiffs.

27 777. The fire which ultimately resulted in MICHAEL O'SHEA's death was a direct,
28 proximate, and legal result of STATE's wrongful acts and omissions, as set forth in paragraphs
644-662 above, entitling decedent's heirs to damages pursuant to Code of Civil Procedure §

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377.60, et seq.

778. Plaintiff is informed and believes and thereon alleges that employees and/or agents of defendants, and each of them, are in some other way responsible for acts and/or omissions that resulted in the public nuisance, which acts and/or omissions are unknown to plaintiffs at the present time. Plaintiffs will seek leave of Court to amend this complaint at such time as plaintiffs discover the other acts and/or omissions of said defendants.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment as follows:

1. Repair, depreciation, and/or replacement of damaged, destroyed, and/or lost personal and/or real property;
2. Loss of the use, benefit, goodwill, and enjoyment of plaintiffs' real and/or personal property;
3. Loss of wages, earning capacity and/or business profits and/or any related displacement expenses;
4. General damages in an amount according to proof;
5. Special damages in an amount according to proof;
6. Wrongful Death general damages in an amount according to proof as to TERRI WEBB, SHERRY BLEDSOE and ED BLEDSOE, on behalf of themselves and all other legal heirs of decedents;
7. Wrongful Death special damages in an amount according to proof as to TERRI WEBB, SHERRY BLEDSOE and ED BLEDSOE, on behalf of themselves and all other legal heirs of decedents;
8. Double damages in an amount according to proof for injuries to trees as allowed under Code of Civil Procedure § 733;
9. Treble or double damages in an amount according to proof for wrongful injuries to timber, trees, or underwood, as allowed under Civil Code § 3346;
10. Attorney's fees, expert fees, consultant fees and litigation costs and expenses as allowed under Code of Civil Procedure § 1021.9;

1 11. For reasonable costs, disbursements and expenses, including attorney's fees,
2 where necessary appraisal fees, and engineering fees, in the prosecution of this action under
3 Code of Civil Procedure section 1036, in amounts according to proof;

4 12. Prejudgment interest;

5 13. All costs of suit incurred herein; and

6 14. Such other and further relief as the Court deems just and proper.

7 15. For the value of destroyed or damaged real or personal property, in amounts
8 according to proof;

9 16. For consequential damages, according to proof;

10 17. For prejudgment and post judgment interest as allowed under applicable law;

11 18. For reasonable costs, disbursements and expenses, including attorney's fees,
12 where necessary appraisal fees, and engineering fees, in the prosecution of this action under
13 Code of Civil Procedure section 1036, in amounts according to proof;

14 19. For costs of suit;

15 20. For such further relief as this Court deems necessary, just and proper.

16
17 DATED: June 5, 2018

BARR & MUDFORD

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19 

20 DUGAN BARR
21 BRANDON STORMENT
22 DOUG MUDFORD
23 CATIE BARR
24 ESTEE LEWIS
25 Attorneys for Plaintiffs

