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12 Attorneys for Claimant  
13 BW Partners II, LLC

14 **GOVERNMENT CLAIM**

15 BW PARTNERS II, LLC, a California limited  
16 liability company;

17 Claimant,

18 vs.

19 LOS ANGELES DEPARTMENT OF  
20 WATER AND POWER, a government entity,  
21 CITY OF LOS ANGELES, a government  
22 entity, and DOES 1-100,

23 Respondents.

**GOVERNMENT CLAIM RELATED TO  
DAMAGES RESULTING FROM THE  
OCTOBER 28, 2019 GETTY FIRE**

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1 LOS ANGELES DEPARTMENT OF WATER AND POWER, a government entity, CITY  
2 OF LOS ANGELES, a government entity, and DOES 1-100, PLEASE TAKE NOTICE that BW  
3 PARTNERS II, LLC, by and through its above-captioned attorneys, hereby submit this  
4 Government Claim to the Respondents herein, based on information and belief. This Government  
5 Claim is in compliance with Government Code section 910, *et seq.*, subsection f. Board-created  
6 forms are only mandatory where the respondent is the state or a judicial branch entity. Gov. C.  
7 910.4; *see Blair v. Sup. Ct.* (1990) 218 Cal.App.3d 221, 225; *see also Phillips v. Desert Hosp. Dist.*  
8 (1989) 49 Cal.3d 699, 706.

9 **1. Parties**

10 Claimant: BW Partners, II, LLC

11 Respondents: Los Angeles Department of Water and Power (hereinafter "LADWP"), City  
12 of Los Angeles, and DOES 1-100.

13 It is alleged herein that all Respondents owned, operated, controlled, installed, maintained,  
14 and inspected the electrical equipment involved in ignition of the October 28, 2019 wildfire now  
15 known as the Getty Fire.

16 Claimant do not know the true names and capacities of the Respondents sued herein as  
17 DOES 1 through 100, inclusive, and therefore sues these Respondents by such fictitious names.  
18 Claimant will amend this Government Claim to allege their true names and capacities when the  
19 same have been ascertained. Claimant is informed and believes and thereon alleges that each of  
20 the fictitiously named Respondents are responsible in some manner for the acts and occurrences  
21 herein alleged, whether such acts and occurrences were committed intentionally, negligently,  
22 recklessly or otherwise and that each said DOE Respondent is liable to Claimant for the damages  
23 claimed herein.

24 At all times herein mentioned, each Respondent was the agent, servant and employee of  
25 each of the remaining Respondents, and in doing the things hereinafter mentioned, each  
26 Respondent was acting within the course and scope of their employment and authority as such  
27 agent, servant and employee and with the consent of their co-Respondents. The conduct of each  
28 Respondent combined and cooperated with the conduct of each of the remaining Respondents so as

1 to cause the herein described incidents and the resulting injuries and damages to Claimant.

2 **2. Names and Addresses of Claimant:**

3 BW Partners II, LLC  
4 11755 Wilshire Blvd., #1600  
5 Los Angeles, CA 90025

6 Affected Property:  
7 1104 N. Tigertail Road  
8 Los Angeles, CA 90049

9 **3. Post office address to which all persons presenting this claim desire all**  
10 **notices and communication to be sent:**

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24 **4. Date, Place & Circumstances Surrounding the Claim:**

25 a. Date, Place, and General Circumstances

26 At approximately 1:34 a.m. on October 28, 2019, the first emergency call was reported for  
27 a fire in the Sepulveda Pass area, near the 1800 block of North Sepulveda Boulevard, at the eastern  
28 edge of the Brentwood neighborhood in Los Angeles, California. The nine (9) day wildfire, now  
known as the Getty Fire, burned more than 745 acres (1.16 square miles) of land, damaged or  
destroyed 27 residences and endangered 7,000 others. The Getty Fire's evacuation zone spanned

1 38 square-miles of the most populated county in the United States, affecting approximately 10,000  
2 homes in the Brentwood and Pacific Palisades neighborhoods of Los Angeles, California.



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9 Sepulveda Pass ablaze after arcing and sparking from LADWP lines ignited the Getty Fire. (Photo Cr:  
10 <https://www.latimes.com/california/story/2019-10-29/getty-fire-arson-investigation>, Nov. 20, 2019).

11 The impact of the Getty Fire required the widespread involvement of City, County, State,  
12 and non-governmental organizations, including the Los Angeles Police Department, CAL FIRE,  
13 Los Angeles County Fire Department, Los Angeles Emergency Management Department, Los  
14 Angeles Department of Recreation and Parks, LADWP, SoCal Gas, American Red Cross, Los  
15 Angeles Public Works, Department of Transportation, Los Angeles Homeless Service Authority,  
16 City Council District 5, and City Council District 11.

17 Claimant BW Partners II, LLC's property on 1104 Tigertail Road was among the many  
18 properties destroyed by the Getty Fire. Had LADWP implemented proper vegetation management  
19 and line maintenance practices that accounted for known risks to its high voltage lines, the Getty  
20 Fire would have been prevented and Claimant would not have lost its valuable property.

21 b. Claimant's Loss. Generally

22 The Getty Fire destroyed Claimant's 1,540 square-foot hillside home on 1104 North  
23 Tigertail Road in the affluent Brentwood neighborhood of Los Angeles, California. In addition to  
24 destroying the multi-million-dollar home, the blaze also destroyed most of its 1.14-acre lot, and  
25 moonscaped the scenic, natural landscaping surrounding it.

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12 Claimant's Brentwood home following its destruction by the Getty Fire. Nov. 2019.



20 Claimant's Brentwood home (bottom right) and the complete moonscaping of the surrounding landscape. Nov. 2019.

21 c. The Getty Fire's Ignition

22 On the day of the fire, Los Angeles County experienced a seasonal weather phenomenon  
23 known as the Santa Ana winds. Those winds were forecasted to be at speeds between 30-50 mph  
24 with peak wind gusts up to 70 mph. Those winds are reported to have separated a branch from a  
25 nearby eucalyptus tree, which was then blown into LADWP's high-voltage sub-transmission lines  
26 near the 1800 block of Sepulveda Boulevard in the middle of the brush and vegetation filled  
27 Sepulveda Pass. The resulting conductor contact created a high-energy electrical event resulting in  
28 arcing and sparking that ignited the abundant dry brush below the lines, igniting the Getty fire.

1 Vehicle dash-cam footage captured a view of this electrical event from the I-405 freeway at  
2 approximately 1:34 a.m. on October 28, 2019. The footage depicts a repeating flash with enough  
3 energy to light up the width of all twelve (12) lanes of the 405 freeway as well as its east and west  
4 hillsides, spanning an estimated 1,400 feet and lighting the night-sky. In the video, the blinding  
5 white light can be seen brightly flashing and flickering three times from an estimated distance of  
6 0.5 miles away.



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17 Remains of the branch that struck LADWP's sub-transmission lines (left), and a freeze-frame of the dash-cam footage  
18 that captured the electrical event. (<https://www.lafd.org/news/getty-fire>, November 19, 2019)

19 The fire risks caused by the seasonal Santa Ana winds and their interactions with poorly  
20 managed vegetation, poorly operated equipment, and poorly maintained electrical lines are known  
21 and predictable. Such conditions have contributed to many of Southern California's largest and  
22 most destructive fires and fire complexes in recent history, including the Cedar Fire, Laguna Fire,  
23 Old Fire, Esperanza Fire, Witch Creek Fire, the Fall 2007 Firestorm, the November 2008  
24 California Wildfires, May 2014 San Diego County Wildfires, Colby Fire, and the recent Thomas,  
25 Woolsey, Creek, and Rye Fires.

26 LADWP has been acutely aware of these risks and their catastrophic results for a significant  
27 period of time. In fact, the public utility's equipment has been responsible for at least three of the  
28 more significant and destructive wildfires in recent Southern California history: The Powerhouse  
Fire, Creek Fire, and the Getty Fire. On May 30, 2013, LADWP electrical equipment caused the

1 30,000-acre Powerhouse Fire resulting in lawsuits from the California Department of Forestry,  
2 CalFire, and more than 100 individual plaintiffs. On December 5, 2017, LADWP electrical  
3 equipment caused the 15,619-acre Creek Fire which destroyed or damaged more than 204  
4 structures, including residential homes. That fire resulted in more than 300 lawsuits by individual  
5 plaintiffs.

6 d. LADWP'S Vegetation Management Practices Fell Below  
7 Industry Standards and Failed to Recognize Known Risks  
8 Related to Eucalyptus Tree Branch Failures and their  
9 Interactions with Transmission Lines

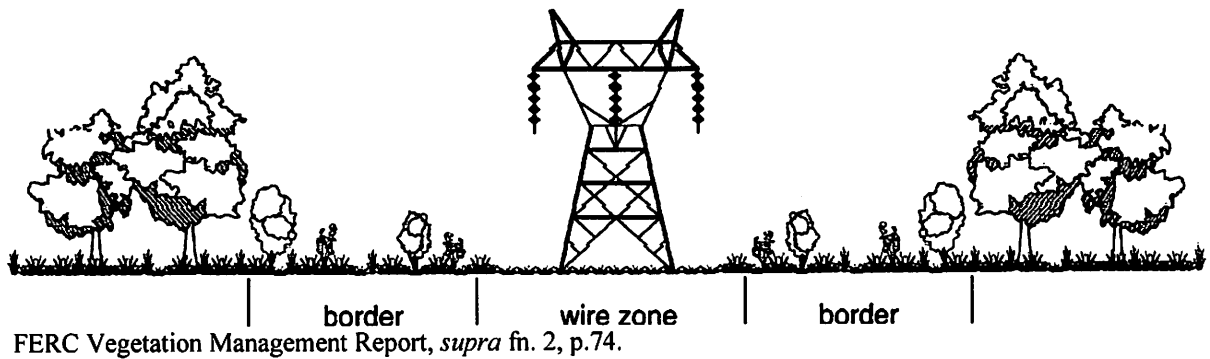
10 Vegetation Management is the safety practice of tree pruning, tree removal, brush removal,  
11 and tree growth control under and near power lines. According to the Federal Energy Regulatory  
12 Commission ("FERC"), vegetation management programs are critical to any utility company that  
13 maintains overhead energized lines. In a report published by FERC in March 2004, it was reported  
14 that tree-powerline initiated fires are typically much more damaging and costly than typical wildland  
15 fires.<sup>1</sup> FERC's review of major historic fires in California indicates that these fires typically cause  
16 significant devastation in comparison to other wildfires because these fires occur in areas with larger  
17 fuel bases of flammable vegetation.<sup>2</sup>

18 Vegetation management programs need to be consistent with Wire Zone – Border Zone  
19 objectives and industry accepted protocols, including but not limited to Integrated Vegetation  
20 Management, which is the practice of promoting desirable, stable, low-growing plant communities  
21 that will resist invasion by tall growing tree species through the use of appropriate and  
22 environmentally sound control methods, using chemical, biological, cultural and/or mechanical  
23 treatments. FERC cites the proper techniques that should be implemented to achieve these goals,  
24 and that information has been available to LADWP for over ten (10) years. FERC emphasizes that  
25 type of work should be prioritized based on the extent of potential interference, among other factors.

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27 <sup>1</sup> *Utility Vegetation Mangement Final Report*, Federal Energy Regulatory Commission & CN Utility Consulting, LLC,  
28 March 2004 (<https://www.ferc.gov/industries/electric/indus-act/reliability/blackout/uvm-final-report.pdf>), ("FERC  
Vegetation Management Report").

<sup>2</sup> See *id.*



Federal guidelines recommend that inspections of Wire Zone – Border Zones be performed on a frequent basis, and that the schedule should be based on anticipated growth. These inspections should be performed by qualified individuals and be scheduled to ensure that all transmission lines are systematically reviewed before conflicts occur.<sup>3</sup>

California laws uphold these standards in mountainous and brush covered land such as the Sepulveda Canyon area: Utility companies owning, controlling, or operating electrical lines crossing mountainous or forest-covered land must generally keep a clearance perimeter around its lines and a firebreak (a complete clearance of combustible material such as vegetation) of at least 10-feet surrounding its poles.<sup>4</sup>

Proper practices in vegetation management include consideration of weather conditions such as Santa Ana winds, and their effects on the trees surrounding utility lines. The consideration of these wind conditions is paramount, and in the Southern California region, such winds are common and predictable. LADWP had a responsibility to ensure that its high-voltage, revenue-generating electrical equipment installed in high fire-risk areas, such as the Sepulveda Pass, does not endanger its own ratepayers and the community at large. This is a nationally understood standard. LADWP's failure to heed these guidelines resulted in predictable dangers and exposure of its highly-reactive sub-transmission lines and transformers to dangerous interactions with local vegetation.

The National Electric Safety Code's ("NESC") Rule 218, the most widely adopted and referenced set of guidelines for vegetation management programs in the United States, emphasizes this safety standard:

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<sup>3</sup> *Id.*

<sup>4</sup> *See* Cal. Pub. Util. Code § 4292.



1           **NESC Rule 218.A.1.: Vegetation that may damage ungrounded**  
2           **supply conductors should be pruned or removed. Vegetation**  
3           **management should be performed as experience has shown to be**  
4           **necessary . . .Factors to consider in determining the extent of**  
5           **vegetation management required include, but are not limited to:**  
6           **line voltage class, species’ growth rates and failure characteristics**  
7           **. . .the vegetation’s location in relation to the conductors, the**  
8           **potential combined movement of vegetation and conductors**  
9           **during routine winds . . .**

6           Eucalyptus trees such as the one involved in the ignition of the Getty Fire are among the top  
7           four trees in the state likely to experience trunk and branch failures.<sup>5</sup> Eucalyptus tree trunk and  
8           branch failures account for 12.5% of all recorded tree failures in the State of California and have  
9           been involved in numerous property and personal injury-causing incidents throughout the State of  
10          California. In 2015, San Diego officials removed all eucalyptus trees from one of its parks after  
11          discovering a number of injuries, death, and property damage incidents related to their branch and  
12          trunk failures.<sup>6</sup> Eucalyptus trees have earned the nickname of “widow maker” for this reason.<sup>7</sup>  
13          LADWP, despite its 100-years of experience as an energy provider, and its meteorological and  
14          environmental knowledge and resources, failed to recognize this danger.

15          LADWP’s own research has reported that floating or wind-blown vegetation debris  
16          contacting conductors and insulators on its transmission lines is a known “operational ignition  
17          source.”<sup>8</sup> A 2011 “Wildfire and Fuels Technical Report,” commissioned by LADWP itself, warned  
18          the public utility of the known risk of floating tree branch interference with high voltage lines such  
19          as the sub-transmission lines along the Sepulveda Pass. The October 28, 2019 electrical event,  
20          involving LADWP’s sub-transmission lines, was both expected and preventable with proper  
21          vegetation management practices.

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23          <sup>5</sup> University of California Western Tree Failure Database ([https://ucanr.edu/sites/treefail/CTFRP\\_Statistics/](https://ucanr.edu/sites/treefail/CTFRP_Statistics/), Nov. 20, 2019).

24          <sup>6</sup> *Preemptory Strike on Eucalypti*, Sheila Pell, Dec. 15, 2015  
25          (<https://www.sandiegoreader.com/news/2015/dec/15/stringers-preemptory-strike-eucalyptus-coronado/>, Nov. 20, 2019)

26          <sup>7</sup> See e.g. (<https://www.oregister.com/2011/09/25/eucalyptus-safety-in-spotlight-after-womans-death/>;  
27          <https://www.sandiegoreader.com/news/2016/jun/01/cover-deport-eucalyptus/>;  
28          <https://www.paloaltoonline.com/news/2010/02/28/widow-maker-tree-limb-nearly-hits-crescent-park-resident>;  
29          <https://www.newworldencyclopedia.org/entry/Eucalyptus>)

30          <sup>8</sup> Power Engineers, Michael Strand, “Barren Ridge Renewable Transmission Project Wildfire and Fuels Technical  
31          Report,” June 2011, p. 33 ([https://openei.org/w/images/f/fl/Barren\\_Ridge\\_FEIS-Volume\\_III\\_Wildfire\\_Tech\\_Rpt\\_Final\\_June\\_2011.pdf](https://openei.org/w/images/f/fl/Barren_Ridge_FEIS-Volume_III_Wildfire_Tech_Rpt_Final_June_2011.pdf)) (“BRRTP Report”).

1 e. LADWP Had the Time, Experience, Knowledge, and  
2 Resources Necessary to Implement Reasonable and Low-  
3 Cost Measures to Prevent the Getty Fire's Ignition

4 LADWP has provided electricity to Los Angeles for over 100 years. It maintains 3,507 miles  
5 of long distance, high voltage (115,000-500,000V) transmission and sub-transmission lines in the  
6 Los Angeles region, in addition to lower-voltage distribution lines.<sup>9</sup> These long-distance  
7 transmission lines, much of which travel through wilderness, such as the Sepulveda Pass, include  
8 some circuits which haven't been replaced since 1943.<sup>10</sup>

9 The 2011 Wildfire and Fuel's Report also concisely summarized exactly why and how the  
10 risk of wildfires, such as the Getty Fire, are especially dangerous to Southern California:

11 Southern California is characterized as one of the most fire-prone  
12 landscapes in the world due to the presence of dense, dry fuels and  
13 a warm, arid climate. Factors influencing wildfire behavior and  
14 magnitude include forest structure, fuel conditions, climate, and the  
15 source of ignition.<sup>11</sup>

16 LADWP has extensive experience and expertise in the transmission of electricity, has  
17 experienced prior line-failures that have led to wildfires, and has knowledge of Los Angeles' risks  
18 for catastrophic wildfires. Long before the Getty Fire, it was well aware of the dangerous condition  
19 of its equipment and substandard vegetation management protocols.

20 f. The Fire Conditions On and Before October 28, 2019 Were Well-Known to  
21 LADWP

22 The high fire risk conditions and the necessity of implementing emergency fire-prevention  
23 protocols in the days prior to the fire were well known. In the days leading up to the Getty Fire, an  
24 entire region of Northern California was ablaze along with the local Saddle Ridge and Tick Fires in  
25 Sylmar and Santa Clarita, respectively. Five days prior to the Getty Fire, the National Weather  
26 Service issued Red-Flag (fire) Warnings for most of Los Angeles County starting on or before  
27 October 23, 2019 and continuing into the beginning of November, providing plenty of warning for  
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29 <sup>9</sup> Los Angeles Department of Water and Power, "2016-17 Power Infrastructure Plan," Jan. 2017,  
30 ([https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB421332&RevisionSelectio  
nMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB421332&RevisionSelectio<br/>nMethod=LatestReleased)), p. 6.

31 <sup>10</sup> *Id.*

32 <sup>11</sup> See generally, BRRT Report, *supra* fn. 8, p. 29 (emphasis added).

1 LADWP to initiate fire-prevention protocols including management of reclosers and power-down  
2 procedures.

3 LADWP is familiar with these fire risks and is aware of the crucial importance of their  
4 prevention. It has provided electricity to Los Angeles for over 100 years. It also maintains 3,507  
5 miles of long distance, high voltage (115,000-500,000V) transmission lines in the Los Angeles  
6 region, in addition to lower-voltage distribution lines throughout the city itself.<sup>12</sup> Its experience has  
7 provided it the opportunity to develop weather forecasting and corresponding fire risk protocols.  
8 Unfortunately for the Los Angeles community, those protocols, once again, have failed.

9 As of August 2017, after its own internal evaluation, LADWP disclosed that approximately  
10 50% of its 320,000 power poles were more than 50 years old. Of those poles, 87,000 (or 21%) were  
11 beyond their 60-year lifespan and required immediate replacement. According to their own internal  
12 plan, those poles were supposed to be consistently replaced beginning in 2007 at a rate of 5,000 poles  
13 per year. However, following that plan, they were replaced at an average rate of only 325 poles per  
14 year, contributing to a weakened or failing infrastructure and increased wildfire risk.<sup>13</sup>

15 LADWP has extensive experience and expertise in the transmission of electricity, has  
16 experienced prior line-failures that have led to wildfires, and has knowledge of Los Angeles' risks  
17 for catastrophic wildfires. It charges rates sufficient to afford to protect the community from the  
18 risks involved in its practices. Despite its knowledge and abundant resources and capabilities as the  
19 largest municipal utility company in the country, its infrastructure and safety practices remain in  
20 disrepair. The repeatedly sparked wildfires are preventable, widespread, and devastating to the  
21 community.

22 g. LADWP is Factually and Legally Responsible for the Getty Fire

23 LADWP and its employees, contractors, and agents' actions and omissions in leaving sub-  
24 transmission lines and surrounding vegetation in disrepair created a known or knowable dangerous  
25 condition on its distribution and sub-transmission lines. The dangerous condition of the lines and  
26 their surrounding vegetation ultimately resulted in arcing, sparking, and the ignition of dry fuel in

27 <sup>12</sup> LADWP 2016-17 Power Infrastructure Plan, *supra* fn. 4, p.6.

28 <sup>13</sup> Reicher, Mike, Daily News, "DWP Lagging Behind on Replacing Old Power Poles; 78,000 Have Exceeded Their Lifespan," (<https://www.dailynews.com/2014/05/06/dwp-lagging-behind-on-replacing-old-power-poles-87000-have-exceeded-their-lifespan/>).

1 the Sepulveda Pass which rapidly spread during the Santa Ana winds event, resulting in the Getty  
2 Fire. Had LADWP and its agents inspected, maintained, and repaired the lines and surrounding  
3 vegetation in accordance with the standard of care, the Getty Fire would not have occurred.

4 LADWP has known of the dangerous condition that its electrical power infrastructure has  
5 remained in for years. They have a non-delegable duty to keep their overhead lines, poles, and  
6 equipment safe and free from dangers associated with the operation, management, and control of its  
7 high-powered electrical hardware. This includes duties to construct, inspect, maintain, repair,  
8 manage, and operate their lines and their surrounding environments in a safe manner, considering  
9 foreseeable dangers to the community, including but not limited to weather conditions such as low  
10 humidity, high heat, dry vegetation, and high winds.

11 LADWP had a duty to (1) furnish and maintain adequate, efficient, just, and reasonable  
12 services, instrumentalities, equipment, and facilities as necessary to promote the safety, health,  
13 comfort, and convenience of its patrons, employees, and the public at large; (2) ensure that the design,  
14 construction, and maintenance of its power conductors, including long or medium distance  
15 transmission or sub-transmission lines, be done in accordance with accepted good practices for the  
16 given local conditions known at the time by those responsible for the design, construction, and  
17 maintenance of those lines and their equipment; (3) safely operate, repair, and maintain their  
18 distribution and sub-transmission lines, conductors, and electrical equipment; (4) inspect their  
19 electrical systems, including their local distribution and long-distance sub-transmission lines, for  
20 safety and reliability under reasonably foreseeable conditions including low humidity, high heat, and  
21 high winds; and (5) implement reasonable safety precautions and preventative measures to avoid  
22 unreasonable fire risks, including conductor slap, sparking, arcing, vegetation interference, and other  
23 catastrophic electrical events in predictable, foreseeable conditions including low humidity, high  
24 heat, and high winds.

25 LADWP breached their duties by falling short of industry safety standards, including but not  
26 limited to, line inspection, equipment upkeep, and preventative measure standards. LADWP failed  
27 to inspect their lines to identify actual and foreseeable risks to the community resulting from  
28 conductor interference so as to prevent the foreseeable danger of arcing, sparking, and other electrical

1 events known to ignite fires, especially where dry vegetation is present below their wires. LADWP  
2 further failed to manage, maintain, repair, modify, and replace their electrical hardware, including,  
3 but not limited to, its distribution lines, sub-transmission lines, transformers, reclosers, line-fault  
4 detection software, and related equipment.

5 LADWP had notice of the dry, windy, and dangerous conditions surrounding its negligently  
6 maintained electrical hardware and the catastrophic fire and fallout risks involved with such a  
7 combination.

8 The foregoing failures and shortcomings resulted in the ignition of the dry vegetation present  
9 throughout the Sepulveda Pass. LADWP's failure to operate, repair, inspect, and maintain its local  
10 distribution and sub-transmission lines, along with its failure to implement reasonable and low-cost  
11 safety measures in a high fire risk area during a high fire risk period, resulted in a wildfire that  
12 affected tens of thousands of residents of the Los Angeles community, destroying valuable homes  
13 and affecting the landscape and real estate for decades to follow.

14 LADWP's conduct failed to meet industry-accepted standards, including but not limited to

- 15 • Design, construction, monitoring, and maintenance of its electrical equipment in a  
16 manner that considered known and foreseeable conditions, including the dangers of  
17 wildfire igniting in regions known for the presence of dry, combustible vegetation;
- 18 • Maintenance of increased clearances between vegetation and power lines throughout the  
19 high fire threat area;
- 20 • Maintenance of appropriate vertical wire-to-wire clearances;
- 21 • A fire-prevention plan for above-ground power lines routinely exposed to high winds in  
22 high fire threat areas;
- 23 • Vigilance in correcting vegetation dangers during known high fire risk times in high fire  
24 risk areas, especially those causing detectable faults on the grid;
- 25 • Recloser programming to prevent detect fault-types and avoid repeated reclosing of  
26 sparking conductors;
- 27 • Routine and reoccurring inspection and maintenance of electrical lines and equipment  
28 in a manner that addresses fire risks, including but not limited to, vegetation or debris

1 interference;

- 2 • Compliance with internal inspections informing the utility of its own failing power  
3 infrastructure; and  
4 • Implementation of an underground conversion program for distribution and sub-  
5 transmission line in high-wind, high-fire risk areas, especially those near densely  
6 populated communities.

7 **5. General Description of the Injury, Damage, and Loss Incurred**

8 The Claimant claim all damages they are lawfully entitled to against all Respondents,  
9 including but not limited to:

- 10 1. All past, present, and future general damages;  
11 2. All past, present, and future special damages;  
12 3. Repair, depreciation, and/or replacement of damaged, destroyed, and/or lost  
13 personal and/or real property;  
14 4. Diminution in property value;  
15 5. Loss of the use, alternative living expenses, benefit, goodwill, and enjoyment  
16 of Claimant's real and/or personal property;  
17 6. Loss of wages, earning capacity, and/or business profits or proceeds and/or  
18 any related displacement expenses;  
19 7. Past and future medical expenses and incidental expenses according to proof  
20 at trial;  
21 8. Attorney's fees, expert fees, consultant fees, and litigation costs and expense,  
22 as allowed under California Code of Civil Procedure, Section 1021.9;  
23 9. All applicable general damages, including but not limited to those for fear,  
24 worry, annoyance, disturbance, inconvenience, mental anguish, emotional  
25 distress, loss of quiet enjoyment of property, and personal injury;  
26 10. Statutory damages;  
27 11. All costs of suit;  
28 12. Prejudgment interest, according to proof;

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- 13. All costs of suit, including attorneys' fees where appropriate, appraisal fees, engineering fees, and related costs;
- 14. Prejudgment interest according to proof; and
- 15. For such other and further relief as the Court shall deem proper, all according to proof.

g. Amount Claimed if Totaled Less than Ten Thousand Dollars as of Date of Claim:

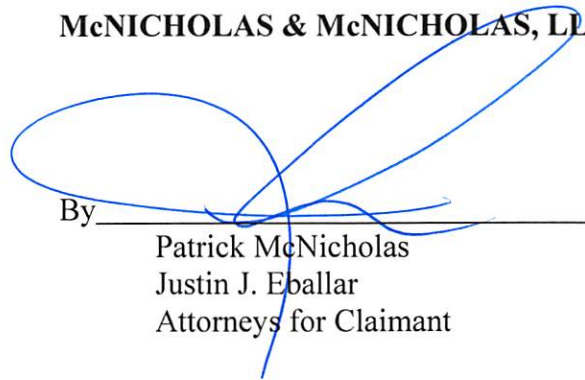
Each Claimant's claim is worth an amount in excess of ten thousand dollars.

Dated: November 21, 2019

**FRANTZ LAW GROUP, APLC**

**McNICHOLAS & McNICHOLAS, LLP**

By /s/ James P. Frantz  
James P. Frantz  
Philip Aman  
William Harris  
M. Regina Bagdasarian  
George T. Stiefel  
Attorneys for Claimant

By   
Patrick McNicholas  
Justin J. Eballar  
Attorneys for Claimant

**BRIDGFORD, GLEASON, & ARTINIAN**

By /s/ Richard Bridgford  
Richard Bridgford  
Michael Artinian  
Attorneys for Claimant

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA** )  
 )  
**COUNTY OF LOS ANGELES** )

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action, my business address is 10866 Wilshire Blvd., Suite 1400, Los Angeles, CA 90024.

On November 21, 2019, I served the foregoing document described as **GOVERNMENT CLAIM RELATED TO DAMAGES RESULTING FROM THE OCTOBER 28, 2019 GETTY FIRE** on the interested parties in said action by placing a true copy thereof enclosed in a sealed envelope, addressed as follows:

Los Angeles Department of Water and Power Attn: Claims Section 221 N. Figueroa St., Suite 1640 Los Angeles, CA 90012 <i>Certified Mail: 7018 2290 0002 2170 6234</i>	Los Angeles City Clerk's Office City Hall 200 N. Main St., Room 395 Los Angeles, CA 90012
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**X (BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED)** I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail in Los Angeles, CA to be served on the parties as indicated on the attached service list. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, CA in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**X (BY PERSONAL SERVICE)** I caused such envelope to be delivered by hand via EXPRESS NETWORK to the offices of the addressee. **LOS ANGELES CITY CLERK'S OFFICE**  
200 N. MAIN ST., ROOM 395  
LOS ANGELES, CA 90012

**(BY OVERNIGHT DELIVERY)** I placed the overnight package for overnight delivery in a box or location regularly maintained by GSO at my office or I delivered the package to an authorized courier or driver authorized by GSO to receive documents. The package was placed in a sealed envelope or package designated by GSO with delivery fees paid or provided for, addressed to the person(s) on whom it is to be served at the address(es) shown above, at the office address(es) as last given by that person on any document filed in the cause and served on the party making service; otherwise at that party's place of residence.

**X (State)** I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 21, 2019, at Los Angeles, California.

  
\_\_\_\_\_  
Christie Casas