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Electronically FILED by
Superior Court of California,
County of Los Angeles
1/13/2025 9:30 AM
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES—NORTHEAST DISTRICT**

10 EVANGELINE IGLESIAS,
11 *Plaintiff,*

12 v.

13 SOUTHERN CALIFORNIA EDISON
14 COMPANY, a California corporation, and
EDISON INTERNATIONAL, a California
15 corporation,

16 *Defendants.*

Case No. **25NNOV00200**

COMPLAINT FOR:

- (1) **NEGLIGENCE;**
- (2) **INVERSE CONDEMNATION;**
- (3) **TRESPASS;**
- (4) **PRIVATE NUISANCE;**
- (5) **PUBLIC NUISANCE;**
- (6) **PREMISES LIABILITY;**
- (7) **VIOLATIONS OF PUBLIC UTILITIES CODE § 2106; and**
- (8) **VIOLATIONS OF HEALTH & SAFETY CODE § 13007.**

DEMAND FOR JURY TRIAL

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20 Plaintiff Evangeline Iglesias brings this Complaint and Demand for Jury Trial against
21 Defendants Southern California Edison Company and Edison International for the harm they caused
22 Plaintiff as a result of the Eaton Fire. Plaintiff alleges as follows upon personal knowledge as to
23 herself and her own acts and experiences, and upon information and belief as to all other matters.

24 **INTRODUCTION**

25 1. On January 7, 2025, the Eaton Fire ignited in the Eaton Canyon located in Los
26 Angeles County, California. The fire rapidly spread through Altadena and quickly decimated
27 thousands of acres of land. As the fire continues to burn nearly a week later, it has already become

1 one of the most devastating fires in California history. It has killed at least eight people, destroyed
2 thousands of homes, and forced the evacuation of hundreds of thousands of residents.

3 2. There is clear evidence from video footage, photographs, and witness accounts that
4 the fire was caused by electrical equipment operated by Defendants Edison International and
5 Southern California Edison (collectively “SCE”).

6 3. SCE had a duty to properly maintain and operate its electrical infrastructure, yet it
7 failed to do so.

8 4. SCE had a duty to ensure that flammable vegetation surrounding its infrastructure
9 was trimmed, to utilize public safety power shutoffs when weather conditions made it unsafe to
10 keep its electrical equipment energized, and to otherwise ensure that its electrical equipment was
11 prepared to handle high-risk weather events. But SCE neglected this duty.

12 5. For days leading up to January 7, 2025, the National Weather Service had issued
13 strong warnings about an upcoming windstorm in the Los Angeles area, and alerted the public to a
14 “FIRE WEATHER WATCH” that covered portions of Los Angeles County, including the Eaton
15 Canyon. This included a specific warning of “*rapid fire growth*” and a “*Dangerous Fire Weather*
16 *situation.*” The National Weather Service also made clear that this weather event was expected to
17 peak beginning on January 7, 2025.

18 6. Sure enough, at approximately 10 a.m. on the morning of January 7, 2025, the
19 National Weather Service formally issued a Red Flag Warning, forecasting wind gusts as high as
20 100 mph, and an extreme risk of fire.

21 7. Despite these repeated and clear warnings, and though it appears that SCE de-
22 energized certain electrical equipment in and around Eaton Canyon, SCE failed to de-energize all of
23 its electrical equipment in the area that day. Specifically, in the hours preceding the first report of a
24 fire in the Eaton Canyon at approximately 6:15 p.m., data shows that there were *more than 300*
25 *faults* on SCE’s lines in the vicinity of the fire’s origin.

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FACTUAL ALLEGATIONS

I. Southern California Edison Had a Duty to Safely Design, Operate, and Maintain Its Infrastructure.

19. SCE is an electric power company in the western United States that supplies power throughout California. In order to supply electricity to the community, SCE installs, constructs, builds, maintains, and operates overhead power lines, supporting poles and infrastructure, and transformers located at and around the origin points of the Eaton Fire.

20. Electrical infrastructure is dangerous and hazardous, and Defendants know these dangers. The transmission and distribution of electricity requires SCE to exercise an increased level of care to protect the public and the communities where their power lines run.

21. At all relevant times, SCE had a duty to properly and safely construct, inspect, repair, maintain, manage, and/or operate its power lines and/or other electrical equipment. This duty includes implementing policies and safeguards to protect the public from the risk of fire—particularly during adverse weather conditions—and taking action when such conditions arise, such as through a public safety power shutoff.

II. Southern California Edison Knew of Elevated Fire Risks on January 7, 2025.

22. Prior to the Eaton Fire, weather conditions in Southern California put the area at a high risk of fire.

23. Southern California experienced a dry season in 2024 with minimal precipitation leading up to the Eaton Fire. According to the *New York Times*, “[m]ost locations south of Ventura County have recorded about a quarter-inch of rain or less in the past eight months, while the Los Angeles area has received only sprinklings of rain since April.” These weather conditions made Southern California bone dry, leaving vegetation primed to burn.

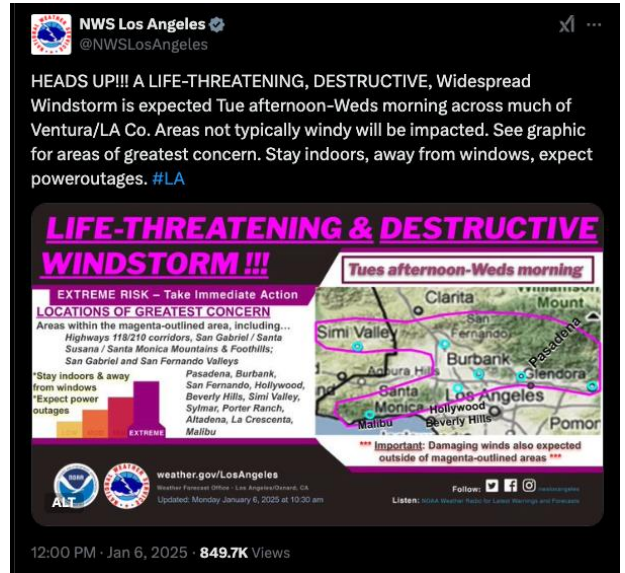
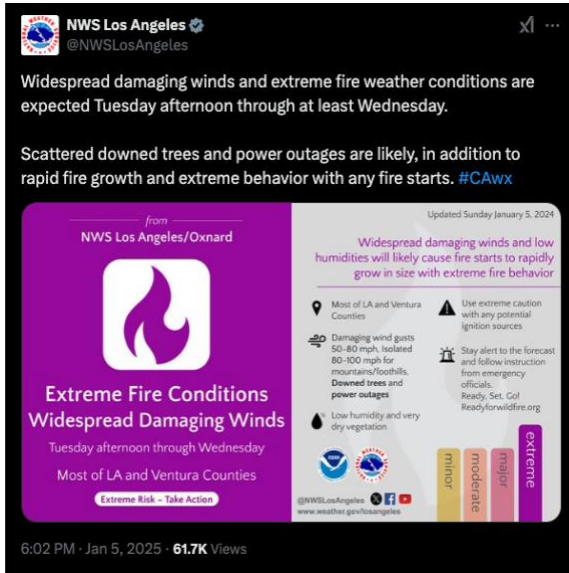
24. Furthermore, the dry Santa Ana winds swept through Los Angeles County in early January. The National Weather Service (“NWS”) in Los Angeles had been warning the public about the impending high wind conditions on its social media pages for several days leading up to January 7, 2025. As early as January 3, 2025, the NWS posted “A Fire Weather Watch is in effect Tuesday-

1 Friday for portions of LA/Ventura Counties. There is the potential for damaging north to northeast
2 winds, that are likely to peak Tuesday-Wednesday.” See Figure 2.



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16 **(Figure 2)**

17 25. On January 5, 2025, the NWS warned the public that “[w]idespread damaging winds
18 and extreme fire weather conditions are expected Tuesday afternoon through at least Wednesday.”
19 The NWS also warned of “rapid fire growth.” See Figure 3. A day later, the NWS again warned of a
20 “A LIFE-THREATENING, DESTRUCTIVE, Widespread Windstorm” threatening Los Angeles
21 County and specifically highlighted Altadena as a location of greatest concern. See Figure 4.



(Figure 3)

(Figure 4)

26. On January 6, 2025, the NWS continued its campaign and, once again, warned the public of a “Dangerous Fire Weather situation, with a high probability of fire ignition sources and rapid spread.” See Figure 5.

(Figure 5)

27. And on January 7, 2025, the NWS issued a Red Flag Warning for Los Angeles County starting January 7, 2025 at 10 a.m. The warning “signifies an increased risk of extreme

1 winds and fire hazards across the region.” At the time, the NWS forecast wind gusts as high as 100
2 mph.

3 **III. SCE’S Electrical Equipment Ignited Nearby Vegetation.**

4 28. SCE knows what weather conditions and other factors contribute to high fire risk and
5 the steps needed to mitigate the risk of, and prevent, fire from igniting. Yet SCE failed to take
6 appropriate actions to prevent the Eaton Fire.

7 29. In light of the increasing number of wildfires in the western United States, SCE
8 implemented new policies in its updated 2023-2025 Wildfire Mitigation Plan intended to “reduce
9 the number of wildfires in California.” That wildfire mitigation plan “outlines actions we’re taking
10 to lower the risk of wildfires associated with our electrical system in high fire risk areas.”

11 30. To mitigate wildfire risks, various utility companies in the West, including SCE,
12 utilize so-called public safety power shutoffs (“PSPS”) during high wildfire risk conditions. This
13 strategy involves preemptively shutting off power, or de-energizing, power lines in an at-risk region
14 for a period of time. Because no electricity flows through the de-energized equipment, that
15 equipment cannot spark and ignite a fire—even if high winds or trees knock down power lines or
16 cause power lines to contact each other.

17 31. According to SCE’s Wildfire Mitigation Plan (“WMP”), SCE touted the
18 effectiveness of using PSPS stating “PSPS is a necessary mitigation to protect public safety under
19 extreme conditions.” SCE’s WMP contemplates using wind speed as a threshold for implementing a
20 PSPS and acknowledges that “during severe conditions, there is heightened risk of ignitions at
21 higher windspeeds primarily due to the possibility of infrastructure damage which can cause wind-
22 driven foreign objects or airborne vegetation coming into contact with and damaging SCE’s
23 equipment.” As such, the WMP recognizes that higher wind thresholds on certain circuits “may not
24 sufficiently mitigate wildfire and public safety risk, and PSPS is necessary as a last resort mitigation
25 measure to prevent ignitions that may lead to significant wildfires.”

26 32. Indeed, SCE claims it “utilizes real-time weather station data and, if available,
27 information from SCE field observers on the ground for enhanced situational awareness to forecast

1 and monitor prevailing environmental conditions (e.g., wind gusts) that can lead to potential
2 damage to equipment or the potential for airborne vegetation or flying debris to contact and damage
3 equipment, to inform de-energization decisions.”

4 33. SCE knows that shutting off power during severe weather conditions reduces fire
5 risks and SCE was also aware that the weather conditions leading up to, and on January 7, 2025,
6 warranted a PSPS in and around the affected areas by the Eaton Fire.

7 34. Nevertheless, SCE did not implement a PSPS in the affected areas throughout
8 January 7, 2025, even though historically high winds swept through areas that had suffered a
9 prolonged period of drought.

10 35. The high winds on January 7, 2025, ultimately (and predictably) caused SCE’s
11 electrical equipment to spark in the Eaton Canyon, lighting vegetation around it. According to
12 witness accounts, electrical equipment in Eaton Canyon was seen sparking and arcing amid high
13 winds, moments before the fire broke out at 6:15 p.m. Witnesses reported seeing sparks and a small
14 fire at the base of a nearby power tower operated by SCE. A photo obtained by KABC-TV taken at
15 6:21 p.m.—shortly after the Eaton Fire erupted—demonstrates the origin of the Eaton Fire. *See*
16 Figure 1.

17 36. According to ABC7, various eyewitnesses reported a fire emerging from under
18 power lines in Eaton Canyon:

- 19 • “Brendan Thorn, who lives in a house that backs up to Eaton Canyon, says his power
20 flickered around 6:10 p.m. And a few minutes later, a neighbor called to say there was a fire
21 under the power lines.”
- 22 • “Harry Kertenian also witnessed the early stages of the Eaton Fire from Kinneloa Mesa on
23 the other side of the canyon He rushed to his property overlooking Eaton Canyon when
24 his mother told him she saw the power lines sparking.”

25 37. An electrical monitoring company that tracks faults along the Los Angeles power
26 grid has reported a dramatic increase in grid faults in areas surrounding the Eaton Fire. Bob
27

1 Marshall, the CEO of Whisker Labs, told Fox News Digital that the company recorded a significant
2 spike in faults in the hours leading up to the fire.

3 38. Marshall explained that Whisker Labs operates a network of around 14,000 “ting”
4 sensors throughout Los Angeles, which are designed to detect and identify faults caused by
5 electrical arcs. This extensive sensor network allows Whisker Labs to monitor the electrical grid
6 with remarkable precision and accuracy. Marshall further clarified, “[f]aults are caused by tree
7 limbs touching wires or wires blowing in the wind and touching. That creates a spark in a fault, and
8 we detect all of those things.”

9 39. According to Whisker Labs, its sensors recorded an alarming number of faults before
10 the fire ignited. Marshall explained, “[i]n the case of the Eaton Fire near Altadena, there’s 317 grid
11 faults that occurred in the hours preceding the ignition.”

12 40. Had SCE de-energized its power lines, implemented a PSPS, or taken other
13 necessary steps to prevent a power line ignition before or as high winds whipped through the region,
14 the devastation caused by the Eaton Fire would have been prevented.

15 **IV. Plaintiff’s Experience in the Fire.**

16 41. Plaintiff owns a single-family home at 3657 Fair Oaks Ave., Altadena, CA 91001.

17 42. At approximately 3:30 a.m. on January 8, 2025, just hours after the Eaton Fire
18 ignited, Plaintiff was forced to evacuate as the fire rapidly approached her home.

19 43. Within hours, Plaintiff’s home was completely destroyed by the Eaton Fire. She lost
20 a lifetime of possessions, including cherished and irreplaceable heirlooms from her mother. She is
21 currently displaced.

22 44. Plaintiff’s losses and harms include but are not limited to destroyed real property,
23 loss of personal property, including cherished and irreplaceable possessions, out-of-pocket
24 expenses, alternative living expenses, personal injury, and emotional distress.

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26 **FIRST CAUSE OF ACTION**
27 **Negligence**

1 45. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

2 46. Defendants have a non-transferable, non-delegable duty to apply a level of care
3 commensurate with and proportionate to the danger of designing, engineering, constructing,
4 operating, and maintaining electrical transmission and distribution systems, including vegetation
5 clearance.

6 47. Defendants have a non-transferable, non-delegable duty of vigilant oversight in the
7 maintenance, use, operation, repair, and inspection appropriate to the changing conditions and
8 circumstances of their electrical transmission and distribution systems.

9 48. Defendants have special knowledge and expertise far above that of a layperson that
10 they were required to apply to the design, engineering, construction, use, operation, inspection,
11 repair, and maintenance of electrical lines, infrastructure, equipment, and vegetation in order to
12 assure safety under all the local conditions in their service area, including but not limited to, those
13 conditions identified herein.

14 49. Defendants negligently breached those duties by, among other things:

- 15 a. Failing to conduct reasonably prompt, proper, and frequent inspections of the
16 electrical transmission lines, wires, and associated equipment;
- 17 b. Failing to design, construct, monitor, and maintain high voltage transmission and
18 distribution lines in a manner that would avoid igniting and/or spreading fire
19 during foreseeable and expected long, dry seasons;
- 20 c. Failing to design, construct, operate, and maintain high voltage transmission and
21 distribution lines and equipment to withstand foreseeable conditions and avoid
22 igniting and/or spreading fires
- 23 d. Failing to maintain and monitor high voltage transmission and distribution lines
24 in known fire-prone areas to avoid igniting and/or spreading fires;
- 25 e. Failing to keep equipment in a safe condition at all times to prevent fires;
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- f. Failing to inspect vegetation within proximity to energized transmission and distribution lines and maintain at a safe distance to avoid igniting and/or spreading fires;
- g. Failing to de-energize power lines during foreseeable and expected fire-prone conditions;
- h. Failing to de-energize power lines after the fire's ignition;
- i. Failing to properly investigate, vet, hire, train, and supervise employees and agents responsible for maintenance and inspection of the distribution lines and proximate vegetation;
- j. Failing to implement and follow regulations and reasonably prudent practices to avoid igniting and/or spreading fire; and
- k. Failing to properly investigate, monitor, and maintain vegetation sufficient to mitigate the risk of fire.

50. Eaton Fire was a direct, legal, and proximate result of Defendants' negligence. As a direct, proximate, and legal result of Defendants' negligence, Plaintiff suffered damages as alleged herein.

51. At all times mentioned herein, Defendants failed to properly inspect and maintain electrical infrastructure and equipment which they knew, given the then existing and known weather, climate, and fire-risk conditions, posed a risk of harm to Plaintiff, and to their real and/or personal property. Defendants were aware that if the subject electrical infrastructure came in contact with vegetation that a fire would likely result. Defendants also knew that, given the existing and known weather, climate, and fire-risk conditions, said fire was likely to pose a risk of property damage, economic loss, personal injury, and/or death to the general public, including to Plaintiff.

52. Over the past decade, Defendants have been subject to fines and penalties as a result of their ongoing failures to abide by safety rules and regulations.

53. The property damage and economic losses caused by Eaton Fire is the result of the ongoing custom and practice of Defendants of consciously disregarding the safety of the public and

1 not following statutes, regulations, standards, and rules regarding their business operations. Despite
2 having caused death and injury to numerous people, extensive property damage, and economic loss,
3 Defendants have continued to act in conscious disregard for the safety of others, and have ratified
4 the unsafe conduct of their employees. Upon information and belief, no employee has been
5 disciplined or discharged as a result of failing and/or refusing to comply with the regulations and/or
6 as a result of the deaths of members of the public.

7 54. Defendants, in order to cut costs, failed to properly inspect and maintain the subject
8 electrical infrastructure with full knowledge that any incident was likely to result in a fire that
9 would burn and/or kill people, damage or destroy property, and/or cause harm to the general public,
10 including Plaintiff.

11 55. Defendants' actions did in fact result in damages to Plaintiff. Defendants failed to
12 make the proper inspections, failed to properly maintain the lines, failed to properly trim vegetation,
13 failed to properly and timely remove vegetation, and failed to safely operate their electrical
14 infrastructure, in order to save money.

15 56. Defendants' negligence was a substantial factor in causing Plaintiff's damages.

16 57. Defendants' failure to comply with their duties of care proximately caused damage
17 to Plaintiff.

18 58. As a further direct and proximate result of Defendants' negligence, Plaintiff suffered
19 damages including, but not limited to, property damage, loss of cherished possessions, economic
20 loss, business loss, emotional distress, annoyance, disturbance, inconvenience, mental anguish, loss
21 of quiet enjoyment of their property, and costs related to evacuation and/or relocation.

22 59. Defendants were and are in a special relationship to Plaintiff. As a supplier of
23 electrical power to Plaintiff, Defendants' operation of their electrical equipment was intended to and
24 did directly affect Plaintiff.

25 60. Defendants operated their electrical infrastructure in close geographic proximity to
26 Plaintiff, and with knowledge of the homes and businesses in close proximity to those wires. As a
27 result, Defendants' operation of their wires was plainly intended to affect Plaintiff.

1 84. Plaintiff owns and/or occupies property at or near the site of Eaton Fire. At all
2 relevant times herein, Plaintiff had a right to occupy, enjoy, and/or use their property without
3 interference by Defendants.

4 85. Defendants' actions, conduct, omissions, negligence, trespass, and failure to act
5 resulted in a fire hazard and a foreseeable obstruction to the free use of Plaintiff's property, invaded
6 the right of Plaintiff to use their property, and interfered with Plaintiff's enjoyment of their property,
7 causing Plaintiff unreasonable harm and substantial actual damages constituting a nuisance pursuant
8 to California Civil Code § 3479.

9 86. As a direct and proximate result of Defendants' conduct, Plaintiff sustained loss and
10 damage, including but not limited to damage to property, discomfort, annoyance, and emotional
11 distress, the amount of which will be proven at trial.

12 87. As a further direct and proximate result of the conduct of Defendants, Plaintiff seeks
13 the reasonable cost of repair or restoration of the property to its original condition and/or loss-of-use
14 damages, as allowed under California Civil Code § 3334.

15 88. Defendants' conduct was willful and wanton, and with a conscious contempt and
16 disdain for the disastrous consequences that Defendants knew could occur as a result of their
17 dangerous conduct. Accordingly, Defendants acted with malice towards Plaintiff, which is an
18 appropriate predicate fact for an award of exemplary/punitive damages in a sum according to proof.

19
20 **FIFTH CAUSE OF ACTION**
Public Nuisance

21 89. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

22 90. Defendants owed a non-transferable, non-delegable duty to the public, including
23 Plaintiff, to conduct their business, in particular the maintenance and/or operation of power lines,
24 power poles, and/or electrical equipment on power poles, and adjacent vegetation in proximity to
25 their electrical infrastructure in Southern California, in a manner that did not threaten harm or injury
26 to the public welfare.

1 91. Defendants, by acting and/or failing to act, as alleged hereinabove, created a
2 condition that was harmful to the health of the public, including Plaintiff, and created a fire hazard
3 and other potentially dangerous conditions to Plaintiff's property, which interfered with the
4 comfortable occupancy, use, and/or enjoyment of Plaintiff's property. This interference is both
5 substantial and unreasonable.

6 92. Plaintiff did not consent, expressly or impliedly, to the wrongful conduct of
7 Defendants.

8 93. The hazardous condition which was created by and/or permitted to exist by
9 Defendants affected a substantial number of people at the same time within the general public,
10 including Plaintiff, and constituted a public nuisance under California Civil Code §§ 3479 and 3480
11 and California Public Resources Code § 4171. Further, the ensuing Eaton Fire constituted a public
12 nuisance under California Public Resources Code § 4170.

13 94. The damaging effects of Defendants' creation of a fire hazard and the ensuing Eaton
14 Fire is ongoing and affects the public at large. As a result of the Eaton Fire location, temperature,
15 and/or duration, extensive areas of hydrophobic soils developed within the burned areas. This
16 further caused significant post-fire runoff hazards to occur, including hillside erosion, debris flow
17 hazards, sediment-laden flow hazards, and hillside erosion. As a result, large quantities of ash and
18 sediment will be deposited in perennial and ephemeral watercourses.

19 95. As a direct and legal result of the conduct of Defendants, Plaintiff suffered harm that
20 is different from the type of harm suffered by the general public. Specifically, Plaintiff has lost the
21 occupancy, possession, use, and/or enjoyment of their land, real, and/or personal property,
22 including, but not limited to: a reasonable and rational fear that the area is still dangerous; a
23 diminution in the fair market value of their property; an impairment of the ability to sell their
24 property; soils that have become hydrophobic; exposure to an array of toxic substances on their
25 land; the presence of "special waste" on their property that requires special management and
26 disposal; and a lingering smell of smoke, and/or soot, ash, and/or dust in the air.

1 96. As a further direct and legal result of the conduct of Defendants, Plaintiff has
2 suffered, and will continue to suffer, discomfort, anxiety, fear, worries, annoyance, and/or stress
3 attendant to the interference with Plaintiff's occupancy, possession, use and/or enjoyment of their
4 property.

5 97. A reasonable, ordinary person would be annoyed or disturbed by the condition
6 created by Defendants, and the resulting Eaton Fire.

7 98. Defendants' conduct is unreasonable and the seriousness of the harm to the public,
8 including Plaintiff, outweighs the social utility of Defendants' conduct. There is little or no social
9 utility associated with causing wildfires to destroy one of the most beautiful and beloved regions of
10 Southern California.

11 99. The individual and/or collective conduct of Defendants set forth above resulting in
12 the Eaton Fire is not an isolated incident but is ongoing and/or a repeated course of conduct, and
13 Defendants' prior conduct and/or failures have resulted in other fires and damage to the public.

14 100. The unreasonable conduct of Defendants is a direct and legal cause of the harm,
15 injury, and/or damage to the public, including Plaintiff.

16 101. Defendants have individually and/or collectively failed to and refused to conduct
17 proper inspections and to properly trim, prune, and/or cut vegetation in order to ensure the safe
18 delivery of electricity to residents and businesses through the operation of power lines in the
19 affected area, and Defendants' individual and/or collective failure to do so exposed every member
20 of the public to a foreseeable danger of personal injury, death, and/or a loss of or destruction real
21 and personal property.

22 102. Defendants' conduct set forth above constitutes a public nuisance within the meaning
23 of Civil Code §§ 3479 and 3480, California Public Resources Code §§ 4104 and 4170, and
24 California Code of Civil Procedure § 731. Under California Civil Code § 3493, Plaintiff has
25 standing to maintain an action for public nuisance because the nuisance is especially injurious to
26 Plaintiff because, as described above, it is injurious and/or offensive to the senses of Plaintiff,
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1 unreasonably interferes with the comfortable enjoyment of their properties, and/or unlawfully
2 obstructs the free use, in the customary manner, of their properties.

3 103. For these reasons, Plaintiff seeks a permanent injunction ordering that Defendants
4 stop continued violation of California Public Resources Code §§ 4292 and 4293 and CPUC General
5 Order 95. Plaintiff also seeks an order directing Defendants to abate the existing and continuing
6 nuisance described above.

7 **SIXTH CAUSE OF ACTION**
8 **Premises Liability**

9 104. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

10 105. Defendants were the owners of an easement and/or real property in the area of origin
11 of the Eaton Fire, and/or were the owners of the electrical infrastructure upon said easement and/or
12 right of way.

13 106. Defendants acted wantonly, unlawfully, carelessly, recklessly, and/or negligently in
14 failing to properly inspect, manage, maintain, and/or control the vegetation near their electrical
15 infrastructure along the real property and easement, allowing an unsafe condition presenting a
16 foreseeable risk of fire danger to exist in said areas.

17 107. As a direct and legal result of the wrongful acts and/or omissions of Defendants,
18 Plaintiff suffered, and continues to suffer, the injuries and damages as set forth above.

19 108. As a further direct and legal result of the wrongful acts and/or omissions of
20 Defendants, Plaintiff seeks the recovery of punitive and exemplary damages against Defendants as
21 set forth above

22 **SEVENTH CAUSE OF ACTION**
23 **Violation of California Public Utilities Code § 2106**

24 109. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

25 110. As Public Utilities, Defendants are legally required to comply with the rules and
26 orders promulgated by the CPUC pursuant to California Public Utilities Code § 702.

27 111. Public Utilities whose failure to perform or inadequate performance of duties
28 required by the California Constitution, a law of the State, or a regulation or order of the Public

1 Utilities Commission, leads to loss or injury, are liable for that loss or injury, pursuant to California
2 Public Utilities Code § 2106.

3 112. As Public Utilities, Defendants are required to provide and maintain service,
4 equipment, and facilities in a manner adequate to maintain the safety, health, and convenience of
5 their customers and the public, pursuant to California Public Utilities Code § 451.

6 113. Defendants are required to design, engineer, construct, operate, and maintain
7 electrical supply lines and associated equipment in a manner consonant with their use, taking into
8 consideration local conditions and other circumstances, so as to provide safe and adequate electric
9 service, pursuant to CPUC General Order 95, and CPUC General Order 165.

10 114. Defendants are required to maintain vegetation in compliance with California Public
11 Resources Code §§ 4293, 4294, 4435 and California Health & Safety Code § 13001.

12 115. Through their conduct alleged herein, Defendants violated California Public Utilities
13 Code §§ 702, 451 and/or CPUC General Order 95, thereby making them liable for losses, damages,
14 and injuries sustained by Plaintiff pursuant to California Public Utilities Code § 2106.

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16 **EIGHTH CAUSE OF ACTION**
Violation of Health & Safety Code § 13007

17 116. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

18 117. By engaging in the acts and omissions alleged in this Complaint, Defendants
19 willfully, negligently, and in violation of law, allowed fire to ignite on or spread to the property of
20 another in violation of California Health & Safety Code § 13007.

21 118. As a legal result of Defendants' violation of California Health & Safety Code §
22 13007, Plaintiff suffered recoverable damages to property under California Health & Safety Code
23 §§ 13008 and 13009.1.

24 119. As a further legal result of the violation of California Health & Safety Code § 13007
25 by Defendants, Plaintiff is entitled to reasonable attorney's fees under California Code of Civil
26 Procedure § 1021.9 for the prosecution of this cause of action.

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Respectfully submitted,

EVANGELINE IGLESIAS,

Dated: January 13, 2025

By:  _____
One of Plaintiff's Attorneys

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Brandt Silver-Korn (SBN 323530)
Ali Moghaddas (SBN 305654)
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