

March 23, 2016

VIA E-MAIL AND U.S. MAIL

David L. Schrader, Esq.
MORGAN, LEWIS & BOCKIUS, LLP
300 South Grand Ave. 22nd Floor
Los Angeles, CA 90071-3132

Re: **NOTICE OF DUTY TO PRESERVE EVIDENCE**

Dear Mr. Schrader,

As you may know, we currently represent a large number of clients in connection with pending claims against Southern California Gas Company and Sempra. We are currently counsel of record in connection with the *Cupial* and *Nazari* actions. More suits will be filed as the judicial coordination process is confirmed. A list of all of our clients to date, is attached. Please ensure that any communications by your firm and any other attorneys of the Gas Company concerning our clients, are directed to our office and to Owen, Patterson & Owen c/o Greg Owen, Esq..

Pursuant to California law, every party to a lawsuit has a duty to preserve all evidence which could be relevant to the suit. This includes the duty to preserve all electronic evidence, such as emails discussing the incident or related to matters at issue in the suit. This duty to preserve evidence is broad and extends to all documents, regardless of whether the document is stored electronically (such as email) or in hard-copy and regardless of the type of document. For example, reports, spreadsheets, photographs and videotapes are all considered documents that must be preserved. Furthermore, the duty to preserve this documentary evidence extends to all documents in existence as of the time you reasonably anticipated this litigation.

To ensure that all relevant documents are preserved, you should communicate directly with all employees who have possession or control of potentially relevant evidence, including but not limited to personnel who deal with email and electronic document retention, deletion, and archiving. You should advise each of these

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employees to preserve any relevant documents in their custody. Furthermore, you should advise all such persons that any regularly scheduled and/or automatic deletion of email or other electronic documents must be discontinued with respect to any relevant data. In addition, any document destruction (such as shredding of documents) must cease with respect to any relevant documents. All relevant documents, both electronic and paper, must be preserved for the duration of this litigation.

Additionally, this letter is also written in advance of service of complaints to place your clients on notice of a number of additional specific categories of items of property and documents for preservation that we will also be requesting from your clients. Please ensure all such visual, video, tape recorded, electronically stored information and/or physical documents, physical items (air filters and/or testing devices), files and/or evidence will be gathered and/or preserved that describe, arise from, relate and/or pertain to:

1. Any and all of the air filters, air samples, soils/property samples that were removed from our clients' (see attached List) homes by So Cal Gas, its employees, agents, independent contractors and/or representatives. We request all such items and/or evidence to be safeguarded and to be provided with a description where they are currently being stored. We understand So Cal Gas has employed independent contractors to remove air filters. We would like to know the chain of custody, current location(s) and methods used to tag and keep track of all such property and/or items. Additionally, please do not enter our clients' properties or homes to remove samples or filters.

2. Our clients (see attached List) who are nearby residents and/or customers of the Gas Company, including but not limited to physical evidence gathered from their homes (air filters, air samples, dirt/property samples), customer files, billing files, complaint files, inspection files, repair files, service files, equipment installation files, relocation claim/reimbursement files, correspondence files, interview notes, photographs, *sub rosa* files, surveys that describe and/or mention our clients, and any other documents, files and/or records maintained by or on behalf of So Cal Gas that describe, mention, refer to and/or concern our clients and/or their residences;

3. The Aliso Canyon Safety Committee, and all documents, minutes, reports, agendas and action items pertaining thereto;

4. Aliso Canyon Employee Training and Injury and Illness Prevention Program and all documents, records and reports pertaining thereto;

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5. Aliso Canyon Inspection, Compliance and Recordkeeping, including but not limited to MAXIMO, ESCMP and SIMS electronically stored and printed documents and information;

6. Aliso Canyon Storage facility contractor files, reports, contracts, claims, invoices, bills, payment records, pre-work meeting notes and minutes, non-compliance and/or inspection documents;

7. Performance and/or conduct of all gas regulatory requirements at the Aliso Canyon Storage facility from inception to present, including all testing, patrolling, leak surveys, repairs, monitoring of corrosion protection systems, inspection and testing of pressure limiting and regulating equipment, and valve and vault upkeep and maintenance in connection and/or accordance with General Order 112-E;

8. Operating history of Aliso Canyon from inception of the Aliso Canyon Storage facility to the present;

9. All subsurface and/or above ground geologic, soils, environmental and/or contamination reports, surveys, testing and/or monitoring;

10. An inventory of the quantity, contents, volume, constituent additives, compounds, and/or chemical components of all natural gas products, by-products, contaminants, gas compression liquids, gas injection liquids and/or gas withdrawal liquids used, maintained, and/or injected below ground at the Aliso Canyon Storage facility from inception of the Aliso Canyon Storage facility to the present;

11. All sudden and/or gradual prior leaks and/or releases of natural gas products, by-products, contaminants, gas compression liquids, gas injection liquids and/or gas withdrawal liquids from inception of the Aliso Canyon Storage facility to the present;

12. Work performed by EERG, Inc. at Aliso Canyon Storage facility;

13. Work performed by AECOM at Aliso Canyon Storage facility;

14. The Aliso Canyon Turbine Replacement Project;

15. The electronically stored and/or physical files, emails, documents, work product, statements, conduct and/or involvement of Lisa Gomez and/or the Environmental Services Department in connection with the Aliso Canyon Storage

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Facility and/or the surrounding community.

16. Any and all documents regarding the presence of PCBs in and around the Aliso Canyon Storage facility;

17. Any and all documents and electronically stored information maintained by Sempra, So Cal Gas Company, their employees, officers, directors, contractors, agents and/or attorneys regarding the Aliso Canyon Storage facility.

We look forward to working with you in connection with the Case Management process. Additionally, please advise me if you will be authorized to accept service of process in this matter, and for which particular entities you will be authorized to accept such service of complaints. Thank you in advance for your attention to this correspondence.

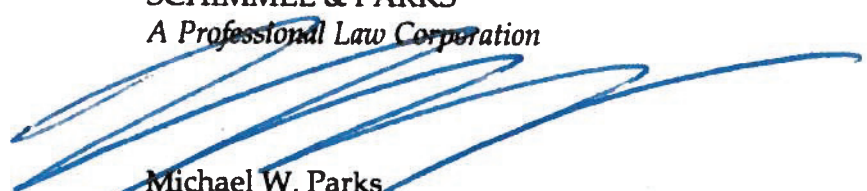
Very truly yours,

OWEN, PATTERSON & OWEN, LLP



Gregory J. Owen

SCHIMMEL & PARKS
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Michael W. Parks

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