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15
16 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
17 **SAN FRANCISCO DIVISION**

18 CITY OF OAKLAND, a Municipal
19 Corporation, and THE PEOPLE OF THE
STATE OF CALIFORNIA, acting by and
20 through Oakland City Attorney,

21 Plaintiff and Real Party in
Interest,

22 v.

23 BP P.L.C., a public limited company of
England and Wales, CHEVRON
24 CORPORATION, a Delaware corporation,
CONOCOPHILLIPS, a Delaware corporation,
25 EXXON MOBIL CORPORATION, a New
Jersey corporation, ROYAL DUTCH SHELL
26 PLC, a public limited company of England and
Wales, and DOES 1 through 10,

27 Defendants.
28

First Filed Case: No. 3:17-cv-6011-WHA
Related Case: No. 3:17-cv-6012-WHA

**CHEVRON CORPORATION'S NOTICE OF
PENDENCY OF OTHER ACTION OR
PROCEEDING**

Case No. 3:17-cv-6011-WHA

1 CITY AND COUNTY OF SAN
2 FRANCISCO, a Municipal Corporation, and
3 THE PEOPLE OF THE STATE OF
4 CALIFORNIA, acting by and through the San
5 Francisco City Attorney DENNIS J.
6 HERRERA,

7 Plaintiff and Real Party in
8 Interest,

9 v.

10 BP P.L.C., a public limited company of
11 England and Wales, CHEVRON
12 CORPORATION, a Delaware corporation,
13 CONOCOPHILLIPS, a Delaware corporation,
14 EXXON MOBIL CORPORATION, a New
15 Jersey corporation, ROYAL DUTCH SHELL
16 PLC, a public limited company of England and
17 Wales, and DOES 1 through 10,

18 Defendants.

Case No. 3:17-cv-6012-WHA

1 **TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that, pursuant to Civil Local Rule 3-13, Defendant Chevron
3 Corporation gives notice that a materially similar action has been filed against the same five
4 Defendants in above-captioned actions by King County, Washington, in the Superior Court of the
5 State of Washington in and for King County, captioned as *King County v. BP P.L.C., et al.* (Case No.
6 18-2-11859-0). The County is represented by the same private attorneys that represent Plaintiffs in
7 these actions. As here, the County purports to bring state common law claims for public nuisance
8 (and trespass) based on alleged injuries arising from the phenomena of global warming and climate
9 change. The County’s alleged injuries, like Plaintiffs’, include sea level rise and flood damage. The
10 County claims that Defendants can be held liable for these and other alleged injuries based on
11 Defendants’ production, marketing, and sale of fossil fuels, although they do not allege that
12 Defendants’ conduct violated any federal or state statute or regulation. The County demands an
13 abatement fund to finance “the use of coastal armament to protect against sea level rise, and other
14 resiliency measures to protect against global warming-induced injuries.”

15 A copy of the complaint in *King County* is attached hereto as Exhibit A. Chevron
16 Corporation has not yet been served. Chevron Corporation anticipates removing this action to federal
17 district court, and therefore has not yet determined whether any coordination between the *King*
18 *County* proceeding and these proceedings is necessary at this time.

1 May 23, 2018

Respectfully submitted,

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3 By: /s/ Theodore J. Boutrous

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