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5	IN THE CIRCUIT COURT O	F THE STATE OF OREGON
6	FOR THE COUNTY	
	Butte Falls Family Ranch, LLC, JJ Farms	Case No. 20CV33885 (Lead Case) √
7 8	LLC, Adrianne Arntt, Emmitt Bateman, Nicholas Burns, Jessica Ann Childress,	
9	James Young, Kristi Clark, David DeLain, Amanda Thompson, William Browning, David Sheridann, Patrick Galasso, Sharon	Case Assigned to: Hon. Steffan Alexander
10	Galasso, Jeffrey Hall, William Edward Klagge, Loriann Sheridan, Mark Hamrick,	Related Cases:
11	Ian McPhee, Tim Miller, Tanya Mullen, Daniel Ohrt, Megan Shaw, Gina	Allen         20CV37430           Salter         21CV33595
12	Browning, Mark Schachtsick, Logan	AIG (21st Century) 22CV26326
13 14	Johnson, Vitalia Robins, K&K Quality Construction LLC, Michael Adee, Darla Schachtsick, Milo Fletcher, Erin Bodily, John Bodily, Joseph Bones, Nancy Chase,	Allstate         22CV29976           Freres Timber         22CV29694           Bell         22CV30450           Dietrich         22CV29187
14	Winter Brunelle, Émilee Robins, Kevin Callaghan, Cherie Robertson-Girod, John	Cady         22CV13946           Logan         22CV29859
16	Bock, Juan Collier, Gabriel David Voth, Brian McKillop, Nicholas Martin, Caitlin	C.W. Specialty Lumber 22CV41640
17	Rose Lyon, DeAnne Duedall, Janice Lee Hohler, Sarah Lally, Ryan Felluca,	MASS SHORT FORM COMPLAINT #6
18	Belinda L Boysun, Daniel Hines, Stephen Hicks, Fallon Hoy, Kaeleen Holmgren, Gary Hohler,	JURY TRIALS DEMANDED
19	Plaintiffs,	
20	v.	
21	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon	
22	registered electric utility and assumed business name of PACIFICORP,	
23	Defendants.	
24		
25		
26		

#### MASS SHORT FORM COMPLAINT #6 - i (20ev33885)

STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227 1600 FAX (503) 227 6840 KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623 1900 FAX (206) 623 3384

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378 Pursuant to CMO 8, each above-captioned plaintiff hereby files their short-form complaint and demands a jury trial on all claims so triable. To reduce administrative burden on the Court and the Clerk's office, each plaintiff's allegations, as presented below, have been separated into differently numbered short-form complaints divided by slip pages.

#### MASS SHORT FORM COMPLAINT #6 - ii (20cv33885)

STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227 1600 FAX (503) 227 6840

KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623 1900 FAX (206) 623 3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378 Short-Form Complaint #1537 - Butte Falls Family Ranch, LLC

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8	IN THE CIRCUIT COURT O FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH
9	Butte Falls Family Ranch, LLC,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19	I. INCORPORATION BY REFERE	NCE OF EXISTING COMPLAINT AND
20		1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

1	alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended			
1	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
2				
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth			
5		II. PLAINTIFF		
6	3.	Plaintiff Name: Butte Falls Family Ranch, LLC		
7		Butte Fails Failing Railen, ELC		
8				
9		$\Box \qquad \text{Priority Plaintiff}^{1}$		
10	4.	All Affected Property Addresses:		
11		5422 Butte Falls Highway, Eagle Point Oregon 97524		
12	5.	Current Mailing Address:		
13	5.	Butte Falls Family Ranch, LLC		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900		
16		Portland, OR 97204		
17	6.	Fire Name:		
18				
19		Echo Mountain Complex		
20		Santiam Canyon		
21		x         South Obenchain		
22		242		
23				
24				
25				
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 2005.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1537 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER COMPC SEATTLE, WA 98101 CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1			III.	CATEGORIES OF INJU	RIES
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			following categories of injury:	
3	Bodily injuries				
4			Emotional	distress, including mental suff	fering, inconvenience,
5			interference	e with normal and usual activi	ties.
6			Loss of con	sortium	
7		X	Primary res	idence total loss	
8			Primary res	idence partial loss	
9		X	Smoke and	ash damage	
10		X	Secondary	residence	
11		Χ	Other struct	tures total loss	
12			Other struct	tures partial loss	
13		X	Real proper	rty improvements (fences, roa	ds, well, septic system, etc.)
14			destroyed		
15			Real proper	rty improvements (fences, roa	ds, well, septic system, etc.)
16	damaged				
17		X	Personal pr	operty damaged or destroyed	
18			Renter total	l loss	
19			Renter part	ial loss	
20		Χ	Damage to	timber, trees, crops, livestock	, animals, or vegetation
21					
22				IV. DAMAGES	
23	8.	Plainti	iff alleges the	e following damages from the	Master Complaint caused by
24	Defendants:				
25	А.	Categ	ories of Dan	nages Sought	
26		X	Damage to	real property	
	STOLL STOLL BERNE LC 209 S.W. (	OKTING & SH OAK STREET , OREGON 972	ILACHTER P.C. 204	<b>#6 – COMPLAINT #1537 - 3</b> KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		Χ	Loss of personal property	
2		X	Lost wages or impairment of earning cap	pacity, and/or business profits or
3			proceeds and/or any related displacement	nt expenses
4		X	Loss of timber, trees, crops, livestock, and	nimals, or vegetation
5		X	Lost business profits or proceeds	
6			Alternative living or displacement exper	nses
7			Past and future medical expenses and in	cidental expenses
8			Emotional distress including mental suff	fering, inconvenience, interference
9			with normal and usual activities	
10			Loss of consortium	
11		X	Any other loss, expenses, costs, or dama	iges
12		X	Costs	
13		X	Pre- and post-judgment interest	
14		X	Double the amount of economic and pro	perty damages
15		X	Further relief as the Court deems equitable	ble and just
16	B.	Amou	int of Damages Sought	
17	9.	Plaint	iff suffered economic damages in an amou	unt not to exceed
18		\$5,00	),000.	
19				
20				
21	C.	Punit	ive Damages Sought X	
22	11.	0.25 t	mes the amount of economic and nonecon	nomic damages.
23				
24				
25				
26				
	STOLL STOLL BERNE LO 209 S.W.	OKTING & SH OAK STREET , OREGON 97	1201 THIRD AVENUE, SUITE 3200           204         SEATTLE, WA 98101	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$5,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1537 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1538 - JJ Farms LLC

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7	IN THE CIRCUIT COURT O	Ε ΤΗΕ STATE OF OREGON
8	FOR THE COUNTY	
9	JJ Farms LLC,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19		NCE OF EXISTING COMPLAINT AND
20	PHASE 1	I TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as in	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	not adopted in Section IV below. Plaintiff
-		
25	reserves the right to amend all portions of this co	mplaint, explicitly anticipates doing so as

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1538 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set forth	herein.			
5		II. PLAINTIFF			
6	3.	Plaintiff Name:			
7		JJ Farms LLC			
8					
9		$\Box \qquad \text{Priority Plaintiff}^{1}$			
10	4.	All Affected Property Addresses:			
11		5422 Butte Falls Highway, Eagle Point Oregon 97524			
12	5.	Current Mailing Address			
13	5.	Current Mailing Address: JJ Farms LLC			
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second AvenueSuite 1900			
15		Portland, OR 97204			
16					
17	6.	Fire Name:			
18					
19		Echo Mountain Complex			
20		Santiam Canyon			
21		x     South Obenchain			
22		242			
23					
24 25					
25 26					
20	I For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation.         MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1538 - 2         STOLL STOLL BERNE LOKTING & SHLACHTER P.C.       KELLER ROHRBACK LL.P.         209 S.W. OAK STREET       1201 THIRD AVENUE, SUITE 3200         PORTLAND, OREGON 97204       SEATTLE, WA 98101         TEL. (503) 227-1600       TEL. (206) 623-1900         FAX (206) 623-3384       TEL. (312) 589-6370				

1		III. CATEGORIES OF INJURIES	
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3	Bodily injuries		
4		Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		x         Primary residence total loss	
8		Primary residence partial loss	
9		x         Smoke and ash damage	
10		x         Secondary residence	
11		x         Other structures total loss	
12		Other structures partial loss	
13		xReal property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged		
17		X         Personal property damaged or destroyed	
18		Renter total loss	
19		Renter partial loss	
20		X Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		X   Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. 0 PORTLAND,	DRM COMPLAINT #6 - COMPLAINT #1538 - 3         EDELSON PC           XTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           AK STREET         1201 THIRD AVENUE, SUITE 3200           DREGON 97204         SEATTLE, WA 98101           FAX (503) 227-6840         TEL. (206) 623-1900	

1		X	Loss of personal property	
2	Lost wages or impairment of earning capacity, and/or business profits or			acity, and/or business profits or
3	proceeds and/or any related displacement expenses			expenses
4		X	Loss of timber, trees, crops, livestock, and	imals, or vegetation
5	x     Lost business profits or proceeds			
6			Alternative living or displacement expense	ses
7			Past and future medical expenses and inc	idental expenses
8			Emotional distress including mental suffe	ering, inconvenience, interference
9			with normal and usual activities	
10			Loss of consortium	
11		X	Any other loss, expenses, costs, or damag	<b>j</b> es
12		X	Costs	
13		X	Pre- and post-judgment interest	
14		X	Double the amount of economic and prop	erty damages
15		X	Further relief as the Court deems equitabl	e and just
16	B.	Amount of Damages Sought		
17	9.	Plainti	ff suffered economic damages in an amou	nt not to exceed
18		\$5,000	,000.	
19				
20				
21	C.	Puniti	ve Damages Sought 🛛	
22	11.	0.25 ti	mes the amount of economic and nonecon-	omic damages.
23				
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	STOLL STOLL BERNE L 209 S.W.	OKTING & SH OAK STREET ), OREGON 97	1201 THIRD AVENUE, SUITE 3200 204 SEATTLE, WA 98101	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$5,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1538 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1539 - Adrianne Arntt

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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON	
8	FOR THE COUNTY		
9	Adrianne Arntt,		
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY	
11	V.	PLAINTIFFS)	
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander	
13	electric utility and assumed business name of PACIFICORP,		
14	Defendants.	JURY TRIAL DEMANDED	
15			
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to	
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.	
18	Plaintiff, by and through their undersigned counsel, alleges as follows:		
19		NCE OF EXISTING COMPLAINT AND	
20	PHASE 1	1 TRIAL	
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in	
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master	
23	Complaint") into this Short Form Complaint as it	f fully set forth herein except any causes of	
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff	
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as	
26	discovery continues, and further reserves the right	nt to increase the total amount of damages	

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1539 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Adrianne Arntt	
8			
9		$\Box$ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		424 North Yodel Lane, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: Adrianne Arntt	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x   Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21		242	
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1539 - 2</b> LOKING & SHLACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 SEATTLE, WA 98101 DO FAX (503) 227-6840 CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES			
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3		x     Bodily injuries			
4	X Emotional distress, including mental suffering, inconvenience,				
5		interference with normal and usual activities.			
6		Loss of consortium			
7		XPrimary residence total loss			
8		Primary residence partial loss			
9		x         Smoke and ash damage			
10		Secondary residence			
11		Other structures total loss			
12		Other structures partial loss			
13		Real property improvements (fences, roads, well, septic system, etc.)			
14		destroyed			
15		Real property improvements (fences, roads, well, septic system, etc.)			
16		damaged			
17		X         Personal property damaged or destroyed			
18		Renter total loss			
19		Renter partial loss			
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation			
21					
22		IV. DAMAGES			
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:				
25	А.	Categories of Damages Sought			
26		X         Damage to real property			
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1539 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           0 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370			

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		$\boxed{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		X Double the amount of economic and property damages
15		$\underline{X}$ Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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		FORM COMPLAINT #6 – COMPLAINT #1539 - 4 DKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. EDELSON PC
	209 S.W. 0	DAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1539 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1540 - Emmitt Bateman

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH
9	Emmitt Bateman,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander
13	PACIFICORP,	
15	Defendants.	JURY TRIAL DEMANDED
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18 19	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:
20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Emmitt Bateman	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		2963 Butte Falls Highway, Eagle Point Oregon 97524	
12			
13	5.	Current Mailing Address: Emmitt Bateman	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		Echo Mountain Complex	
19		Santiam Canyon	
20		x         South Obenchain	
21			
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1540 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 OU FAX (503) 227-6840 TEL. (206) 623-1900 Keller ROHRBACK LL.P. DA STREET CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1540 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           JORGON 97204         SEATTLE, WA 98101           10 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		Alternative living or displacement expenses
7		Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x Costs
13		x Pre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		$\underline{x}$ Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1540 - 4         OKTING & SHLACHTER P.C.       KELLER ROHRBACK LL.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N LASALLE ST. 14TH FLOOP
	1	OAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1540 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1541 - Nicholas Burns

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH
9	Nicholas Burns,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19 20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1541 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

11 1 1		
alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended		
	[236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
fully set forth	n herein.	
	II. PLAINTIFF	
3.	Plaintiff Name:	
	Nicholas Burns	
	$\Box \qquad \text{Priority Plaintiff}^1$	
4.	All Affected Property Addresses:	
	393 North Best View Drive, Otis Oregon 97368	
5.	Current Mailing Address: Nicholas Burns	
	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
	Suite 1900 Portland, OR 97204	
6.	Fire Name:	
	x     Echo Mountain Complex	
	Santiam Canyon	
	South Obenchain	
	242	
age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1541 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 KELLER ROHRBACK LL.P. COMPLAINT #100 FAX (206) 623-3384 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378	
	Complaint ¶ 2. fully set forth 3. 4. 5. 6. <sup>1</sup> For purpose age and/or prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W PORTLANT	

1		III. CATEGORIES OF INJURIES			
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:				
3		x     Bodily injuries			
4	x         Emotional distress, including mental suffering, inconvenience,				
5		interference with normal and usual activities.			
6		Loss of consortium			
7		xPrimary residence total loss			
8		Primary residence partial loss			
9		x         Smoke and ash damage			
10		Secondary residence			
11		Other structures total loss			
12		Other structures partial loss			
13		Real property improvements (fences, roads, well, septic system, etc.)			
14		destroyed			
15	Real property improvements (fences, roads, well, septic system, etc.)				
16		damaged			
17	X         Personal property damaged or destroyed				
18		XRenter total loss			
19		Renter partial loss			
20		x         Damage to timber, trees, crops, livestock, animals, or vegetation			
21					
22		IV. DAMAGES			
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:				
25	А.	Categories of Damages Sought			
26		X   Damage to real property			
	STOLL STOLL BERNE LC 209 S.W. ( PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1541 - 3         EDELSON PC           DXTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384			

1		x         Loss of personal property	
2		x Lost wages or impairment of earning capacity, and/or business profits or	
3		proceeds and/or any related displacement expenses	
4		X Loss of timber, trees, crops, livestock, animals, or vegetation	
5		x         Lost business profits or proceeds	
6		X         Alternative living or displacement expenses	
7		x         Past and future medical expenses and incidental expenses	
8		x         Emotional distress including mental suffering, inconvenience, interference	
9		with normal and usual activities	
10		Loss of consortium	
11		X Any other loss, expenses, costs, or damages	
12		x   Costs	
13		x Pre- and post-judgment interest	
14		x         Double the amount of economic and property damages	
15		x Further relief as the Court deems equitable and just	
16	B.	Amount of Damages Sought	
17	9.	Plaintiff suffered economic damages in an amount not to exceed	
18		\$5,000,000.	
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed	
20		\$25,000,000.	
21	C.	Punitive Damages Sought x	
22	11.	0.25 times the amount of economic and noneconomic damages.	
23			
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	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1541 - 4 OKTING & SHLACHTER P.C. KELLER ROHRBACK L.L.P. EDELSON PC	
	209 S.W.	OAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR	

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

	Check if Applicable	Cause of Action Number	Cause of Action
	$\boxtimes$	1	Negligence
	$\boxtimes$	2	Gross Negligence
	$\boxtimes$	3	Private Nuisance
	$\boxtimes$	4	Public Nuisance
	$\boxtimes$	5	Trespass
	$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1541 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1542 - Jessica Ann Childress

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7 8		OF THE STATE OF OREGON Y OF MULTNOMAH			
9	Jessica Ann Childress,				
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY			
11	V.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)			
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander			
14 15	Defendants.	JURY TRIAL DEMANDED			
16 17 18	The Plaintiff named below files this Short Form Complaint and Jury Demand to determine Plaintiff's damages against Defendants by and through the undersigned counsel. Plaintiff, by and through their undersigned counsel, alleges as follows:				
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL			
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in			
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of			
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the right	nt to increase the total amount of damages			

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1542 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as	if			
4	fully set forth herein.				
5	II. PLAINTIFF				
6	3. Plaintiff Name:				
7	Jessica Ann Childress				
8					
9	$\Box \qquad \text{Priority Plaintiff}^1$				
10	4. All Affected Property Addresses:				
11	144 North Westview Circle, Otis Oregon 97368 991 Forest Rd, Otis, OR 97368				
12					
13	5. Current Mailing Address: Jessica Ann Childress				
14	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue				
15	Suite 1900 Portland, OR 97204				
16					
17	6. Fire Name: X Echo Mountain Complex				
18	Santiam Canyon				
19	South Obenchain				
20	$\square 242$				
21					
22					
23					
24					
25					
26	<ul> <li><sup>1</sup> For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation.</li> <li>MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1542 - 2</li> <li>STOLL STOLL BERNE LOKTING &amp; SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 SEATTLE, WA 98101 TEL. (503) 227-1600 FAX (503) 227-6840</li> <li>KELLER ROHRBACK LL.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384</li> </ul>	; of			

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3		x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		xPrimary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17		X         Personal property damaged or destroyed		
18		Renter total loss		
19		Renter partial loss		
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		X   Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. ( PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1542 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           , OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10         FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370		

1		x         Loss of personal property		
2		x Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		x         Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		xPre- and post-judgment interest		
14		X Double the amount of economic and property damages		
15		x Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	9. Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	10. Plaintiff suffered non-economic damages in an amount not to exceed		
20	\$25,000,000.			
21	C. Punitive Damages Sought x			
22	11. 0.25 times the amount of economic and noneconomic damages.			
23				
24				
25				
26				
	STOLL STOLL BERNE L 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1542 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900		

## V. CAUSES OF ACTION ASSERTED

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1542 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1543 - James Young

IN THE CIRCUIT COURT O	F THE STATE OF OREGON	
	OF MULTNOMAH	
James Young,		
Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY	
V.	PLAINTIFFS)	
PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander	
electric utility and assumed business name of		
Defendants.	JURY TRIAL DEMANDED	
The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to	
determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.	
Plaintiff, by and through their undersigned counsel, alleges as follows:		
	NCE OF EXISTING COMPLAINT AND	
PHASE	1 TRIAL	
1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in	
James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master	
Complaint") into this Short Form Complaint as it	f fully set forth herein except any causes of	
action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff	
reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as	
discovery continues, and further reserves the righ	nt to increase the total amount of damages	
	James Young, Plaintiff, v. PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP, Defendants. The Plaintiff named below files this Shord determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigned I. INCORPORATION BY REFERE PHASE 1. Plaintiff expressly incorporates by James, et al. v. PacifiCorp, et al (No. 20CV3388 Complaint'') into this Short Form Complaint as i action from the James Fifth Amended Complaint reserves the right to amend all portions of this co	

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1543 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth herein.		
5	II. PLAINTIFF		
6	3. Plaintiff Name:		
7	James Young		
8			
9	$\Box$ Priority Plaintiff <sup>1</sup>		
10	4. All Affected Property Addresses:		
11	701 West Central Street, Gates Oregon 97346		
12			
13	5. Current Mailing Address: James Young		
14	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15	Suite 1900 Portland, OR 97204		
16			
17	6. Fire Name:		
18	Echo Mountain Complex		
19	X Santiam Canyon		
20	South Obenchain		
21			
22			
23			
24			
25			
26	<ul> <li><sup>1</sup> For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation.</li> <li>MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1543 - 2 STOLL STOLL BERNE LOKTING &amp; SHLACHTER P.C. KELLER ROHRBACK LL.P.</li> <li>209 S.W. OAK STREET 1201 THIRD AVENUE, SUITE 3200 PORTLAND, OREGON 97204 SEATTLE, WA 98101 TEL. (503) 227-1600 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384</li> </ul>		

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3		x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged			
17	X         Personal property damaged or destroyed			
18	Renter total loss			
19		Renter partial loss		
20	X         Damage to timber, trees, crops, livestock, animals, or vegetation			
21				
22	IV. DAMAGES			
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		X   Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1543 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           , OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10         FAX (503) 227-6840         TEL. (206) 623-1300         FAX (206) 623-3384         TEL. (312) 589-6370		

1		x         Loss of personal property		
2		x Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		$\boxed{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		x         Any other loss, expenses, costs, or damages		
12		xCosts		
13		xPre- and post-judgment interest		
14		X Double the amount of economic and property damages		
15		X Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	С.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE LC	FORM COMPLAINT #6 – COMPLAINT #1543 - 4 KELLER ROHRBACK LL.P. EDELSON PC		
	209 S.W. 0	DAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR		

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

## V. CAUSES OF ACTION ASSERTED

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1543 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1544 - Kristi Clark

1				
2				
3				
4				
5				
6				
7	IN THE CIPCUIT COURT O	F THE STATE OF OREGON		
8		OF MULTNOMAH		
9	Kristi Clark,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	25, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of		
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff		
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1544 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	n herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Kristi Clark	
8			
9		$\Box \qquad \text{Priority Plaintiff}^1$	
10	4.	All Affected Property Addresses:	
11		260 North Pony Trail Lane, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: Kristi Clark	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x     Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21			
22			
23			
24			
25			
26	age and/or to prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1544 - 2 OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 KELLER ROHRBACK LL.P. COAK STREET 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. COAK STREET 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER (206) 623-1900 FAX (206) 623-3384 KELLER (206) 623-1900 FAX (206) 623-3384	

1		III. CATEGORIES OF INJURIES			
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:				
3		X     Bodily injuries			
4		x Emotional distress, including mental suffering, inconvenience,			
5		interference with normal and usual activities.			
6		Loss of consortium			
7		xPrimary residence total loss			
8		Primary residence partial loss			
9		X         Smoke and ash damage			
10		Secondary residence			
11		Other structures total loss			
12		Other structures partial loss			
13		Real property improvements (fences, roads, well, septic system, etc.)			
14		destroyed			
15		Real property improvements (fences, roads, well, septic system, etc.)			
16		damaged			
17	X         Personal property damaged or destroyed				
18	Renter total loss				
19		Renter partial loss			
20	X         Damage to timber, trees, crops, livestock, animals, or vegetation				
21					
22		IV. DAMAGES			
23	8. Plaintiff alleges the following damages from the Master Complaint caused by				
24	Defendants:				
25	А.	Categories of Damages Sought			
26		x         Damage to real property			
	STOLL STOLL BERNE LC 209 S.W. 0 PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1544 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           0 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370			

1		x         Loss of personal property		
2		X Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		$\mathbf{x}$ Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x   Costs		
13		x Pre- and post-judgment interest		
14		X Double the amount of economic and property damages		
15		$\underline{x}$ Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE L	FORM COMPLAINT #6 - COMPLAINT #1544 - 4         OKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR		

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 SEATTLE, WA 50101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

## V. CAUSES OF ACTION ASSERTED

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1544 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

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 SEATTLE, WA 98101

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Short-Form Complaint #1545 - David DeLain

1				
2				
3				
4	IN THE CIRCUIT COURT O FOR THE COUNTY			
5	DAVID DELAIN,	Case No. 20CV33885 (Lead Case)		
6	Plaintiff,			
7	V.	Case Assigned to: Hon. Steffan Alexander		
8	PACIFICORP, an Oregon corporation; and	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
9	PACIFIC POWER, an Oregon registered electric utility and assumed business name of	PLAINTIFFS)		
10	PACIFICORP,	JURY TRIAL DEMANDED		
11	Defendants.			
12	The Plaintiff named below file(s) this Short Form Complaint and Jury Demand to			
13	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
14	Plaintiff, by and through their undersigned counsel, allege(s) as follows:			
15 16	I. INCORPORATION BY REFERENCE PHASE 1			
17	25. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
18				
19	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
20	action from the <i>James</i> Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
21	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
22	discovery continues, and further reserves the right to increase the total amount of damages			
23	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
24	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 2	63, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
25	26. Plaintiff expressly incorporate(s)	by reference the jury verdicts from Phase 1, as if		
26	fully set forth herein.			
	MASS SHORT FORM COMPLAINT #6 – COMPLAIN	T #1545 - 1		

STOLL STOLL BERNE LOKTING & SHLACHTER P.C. KE 209 S.W. OAK STREET 1201 T

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840 KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		II. PLAINTIFF
2	27.	Plaintiff Name:
3		David DeLain
4		$\Box$ Priority Plaintiff <sup>3</sup>
5	28.	All Affected Property Addresses:
6		2368 Salmon River Hwy #6, Otis, Oregon 97368
7	29.	Current Mailing Address:
8		David DeLain c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
9		601 SW Second Avenue Suite 1900 Portland OB 07204
10	30.	Portland, OR 97204 Fire Name:
11	50.	<ul> <li>Echo Mountain Complex</li> </ul>
12		□ Santiam Canyon
13		□ South Obenchain
14		$\square 242$
15		III. CATEGORIES OF INJURIES
16	31.	Plaintiff allege(s) Defendants caused them the following categories of injury:
17		☑ Bodily injuries
18		Emotional distress, including mental suffering, inconvenience,
19		interference with normal and usual activities.
20		□ Loss of consortium
21		□ Primary residence total loss
22		□ Primary residence partial loss
23		$\Box$ Smoke and ash damage
24		□ Secondary residence
25		
26	age and/or f	s of this short-form complaint, a priority plaintiff is a party who is over 70 years of or whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation.
		FORM COMPLAINT #6 – COMPLAINT #1545 - 2 KTING & SHLACHTER P.C. KELLER ROHRBACK L.L.P. EDELSON PC

OLL STOLL BERNE LOKTING & SHLACHTEF 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840  #0 – CONTLANT #1343 – KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1			Other structures total loss
2			Other structures partial loss
3			Real property improvements (fences, roads, well, septic system, etc.)
4			destroyed
5			Real property improvements (fences, roads, well, septic system, etc.)
6			damaged
7		$\boxtimes$	Personal property damaged or destroyed
8			Renter total loss
9			Renter partial loss
10			Damage to timber, trees, crops, livestock, animals, or vegetation
11			IV. DAMAGES
12	32.	Plaint	iff allege(s) the following damages from the Master Complaint caused by
13	Defendants:		
14	А.	Categ	ories of Damages Sought
15			Damage to real property
16		$\boxtimes$	Loss of personal property
17		$\boxtimes$	Lost wages or impairment of earning capacity, and/or business profits or
18			proceeds and/or any related displacement expenses
19			Loss of timber, trees, crops, livestock, animals, or vegetation
20			Lost business profits or proceeds
21			Alternative living or displacement expenses
22			Past and future medical expenses and incidental expenses
23		$\boxtimes$	Emotional distress including mental suffering, inconvenience, interference
24			with normal and usual activities
25			Loss of consortium
26		$\boxtimes$	Any other loss, expenses, costs, or damages
		$\boxtimes$	Costs
	MASS SHORT I STOLL STOLL BERNE LO		COMPLAINT #6 – COMPLAINT #1545 - 3 REACHTER P.C. KELLER ROHRBACK L.L.P. EDELSON PC
	209 S.W.	OAK STREET , OREGON 97	1201 THIRD AVENUE, SUITE 3400         350 N. LASALLE ST., 14TH FLOOR           204         SEATTLE, WA 98101         CHICAGO, IL 60654

1		⊠ Pre-	- and post-judgn	nent interest	
2		☑ Double the amount of economic and property damages			
3		⊠ Fur	ther relief as the	Court deems equitable and just	
4	B.	Amount of	f Damages Soug	ght	
5	33.	Plaintiff su	ffered economic	damages in an amount not to exceed \$1 mill	lion.
6	34.	Plaintiff su	ffered non-econ	omic damages in an amount not to exceed \$2	25 million.
7	C.	Punitive D	amages Sought		
8	35.	0.25 times	the amount of eq	conomic and noneconomic damages.	
9			V. CAUSES O	F ACTION ASSERTED	
10	24.			ction asserted in the Master Complaint and	
11	Short From	0	ons and Phase I	verdict with regard thereto are adopted into t	this
12			Cause of		
13		Check if Applicable	Action Number	Cause of Action	
14		$\boxtimes$	1	Negligence	
		$\boxtimes$	2	Gross Negligence	
15					
			3	Private Nuisance	
16			3	Private Nuisance Public Nuisance	
16 17			_		
16 17 18			4	Public Nuisance	
16 17 18 19	WH		4 5 6	Public Nuisance       Trespass       Injunction	
16 17 18 19 20		EREFORE, Pl	4 5 6 aintiff pray(s) fo	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for	
16 17 18 19 20 21	\$26,000,000	EREFORE, Pl	4 5 6 aintiff pray(s) fo	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for         dgment interest, costs, attorneys' fees, double	ing of
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	\$26,000,000 economic an	EREFORE, Plant together with	4 5 6 aintiff pray(s) fo pre and post-ju- mages under OF	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for         dgment interest, costs, attorneys' fees, double         RS 477.089, punitive damages, injunctive relief	ing of ief, and
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	\$26,000,000 economic an all other reli	EREFORE, Plant together with	4 5 6 aintiff pray(s) fo pre and post-ju- mages under OF	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for         dgment interest, costs, attorneys' fees, double	ing of ief, and
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	\$26,000,000 economic an	EREFORE, Plant together with	4 5 6 aintiff pray(s) fo pre and post-ju- mages under OF t deems proper,	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for         dgment interest, costs, attorneys' fees, double         RS 477.089, punitive damages, injunctive relie         equitable, and just, and as set forth in the Material	ing of ief, and
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	\$26,000,000 economic an all other reli Complaint.	EREFORE, Pla together with ad property dat ef as the Cour	4 5 6 aintiff pray(s) for a pre and post-ju- mages under OF t deems proper, <b>VI.J</b>	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for         dgment interest, costs, attorneys' fees, double         RS 477.089, punitive damages, injunctive reli         equitable, and just, and as set forth in the Ma         URY DEMAND	ing of ief, and
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	\$26,000,000 economic an all other reli Complaint.	EREFORE, Pla together with ad property dat ef as the Cour	4 5 6 aintiff pray(s) fo a pre and post-ju- mages under OF t deems proper,	Public Nuisance         Trespass         Injunction         or relief and judgment against Defendants for         dgment interest, costs, attorneys' fees, double         RS 477.089, punitive damages, injunctive reli         equitable, and just, and as set forth in the Ma         URY DEMAND	ing of ief, and

STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840 KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378 Short-Form Complaint #1546 - Amanda Thompson

1 2 3 4 5 6		
7 8		OF THE STATE OF OREGON OF MULTNOMAH
9 10	Amanda Thompson, Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
<ol> <li>11</li> <li>12</li> <li>13</li> </ol>	v. PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	PLAINTIFFS) Case Assigned to: Hon. Steffan Alexander
14 15	PACIFICORP, Defendants.	JURY TRIAL DEMANDED
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>		s by and through the undersigned counsel.
<ul><li>21</li><li>22</li><li>23</li></ul>	<ol> <li>Plaintiff expressly incorporates by James, et al. v. PacifiCorp, et al (No. 20CV3388 Complaint") into this Short Form Complaint as i</li> </ol>	
24 25 26	action from the <i>James</i> Fifth Amended Complain reserves the right to amend all portions of this co discovery continues, and further reserves the right	t not adopted in Section IV below. Plaintiff omplaint, explicitly anticipates doing so as

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1546 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if				
4	fully set fort	h herein.			
5		II. PLAINTIFF			
6	3.	Plaintiff Name:			
7		Amanda Thompson			
8					
9		□ Priority Plaintiff <sup>1</sup>			
10	4.	All Affected Property Addresses:			
11		293 N Westview Dr., Otis Oregon 97368			
12					
13	5.	Current Mailing Address: Amanda Thompson			
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue			
15		Suite 1900 Portland, OR 97204			
16					
17	6.	Fire Name:			
18		x     Echo Mountain Complex			
19		Santiam Canyon			
20		South Obenchain			
21		242			
22					
23					
24					
25					
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1546 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 OU FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378			

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1546 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           JORGON 97204         SEATTLE, WA 98101           10 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384

1	x     Loss of personal property				
2	Lost wages or impairment of earning capacity, and/or business profits of				
3	proceeds and/or any related displacement expenses				
4	Loss of timber, trees, crops, livestock, animals, or vegetation				
5		Lost business profits or proceeds			
6		Alternative living or displacement expenses			
7		Past and future medical expenses and incidental expenses			
8		x         Emotional distress including mental suffering, inconvenience, interference			
9		with normal and usual activities			
10		Loss of consortium			
11		X Any other loss, expenses, costs, or damages			
12		xCosts			
13		xPre- and post-judgment interest			
14		x         Double the amount of economic and property damages			
15		x Further relief as the Court deems equitable and just			
16	B.	Amount of Damages Sought			
17	9.	Plaintiff suffered economic damages in an amount not to exceed			
18		\$5,000,000.			
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed			
20		\$25,000,000.			
21	C.	Punitive Damages Sought X			
22	11. 0.25 times the amount of economic and noneconomic damages.				
23					
24					
25					
26					
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1546 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900			

## V. CAUSES OF ACTION ASSERTED

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1546 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

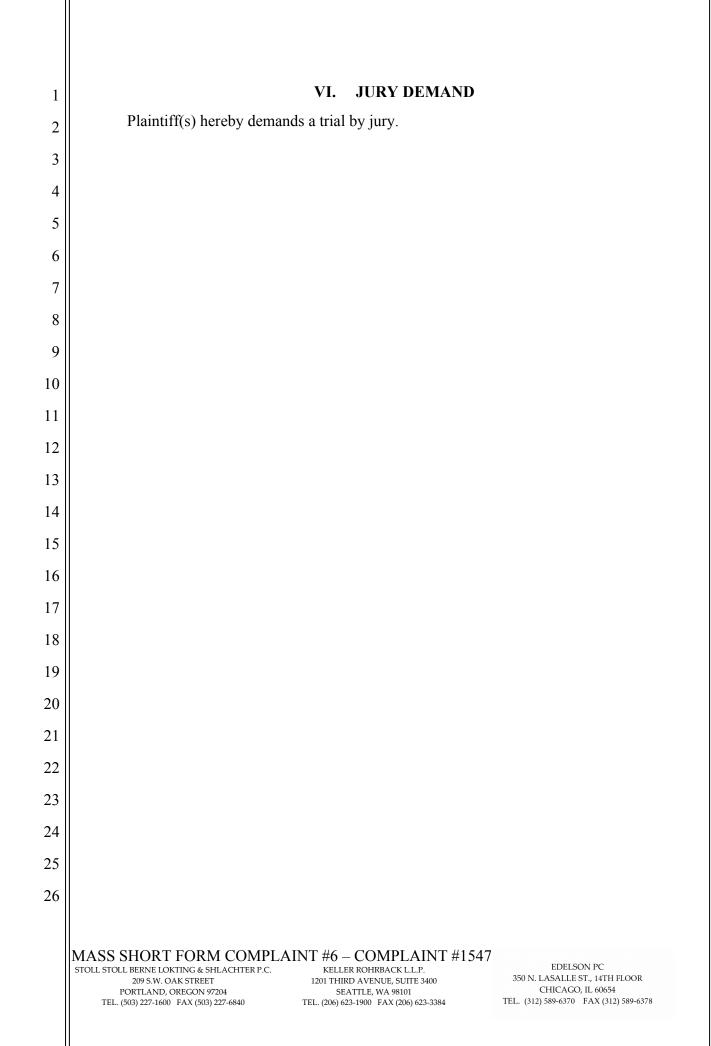
Short-Form Complaint #1547 - William Browning

1					
2					
3					
4	IN THE CIRCUIT COURT OF THE STATE OF OREGON				
5	FOR THE COUNTY	OF MULTNOM	AH		
6	WILLIAM BROWNING,	Case No. 20C	CV33885 (Lead Case)		
7	Plaintiff,		M COMPLAINT AND JURY		
8	V.		/ILLIAM BROWNING)		
9 10	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned	d to: Hon. Steffan Alexander		
11	electric utility and assumed business name of PACIFICORP,				
12	Defendants.				
13					
14	The Plaintiff(s) named below file(s) this Short Form Complaint and Jury Demand to				
15	determine Plaintiff(s) damages against Defendants by and through the undersigned counsel.				
16	Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:				
17	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND				
18	PHASE	I TRIAL			
19	13. Plaintiff(s) expressly incorporate(s) by reference the Fifth Amended Complaint in				
20	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master				
21	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of				
22	action from the James Fifth Amended Complain	t not adopted in Se	ection IV below. Plaintiff(s)		
23	reserve their right to amend and increase the tota	l amount of damag	ges alleged and prayed for on		
24	behalf of the class. See, e.g., Fifth Amended Con	mplaint ¶¶ 236-37	, 240, 242, 250, 252, 261, 263,		
25	269, 271, 281; Prayer for Relief ¶¶ B., D.				
26	14. Plaintiff(s) expressly incorporate(	s) by reference the	e jury verdicts from Phase 1,		
	as if fully set forth herein.				
	MASS SHORT FORM COMPLAINT #6 – COM STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 41 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840 TEL. (206) 623-1900 FAX	CK L.L.P. , SUITE 3400 98101	- EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 FEL. (312) 589-6370 FAX (312) 589-6378		

1			II. PLAINTIFF(S)
2	15.	Plainti	f(s) Names:
3		Willia	n Browning
4			Priority Plaintiff <sup>2</sup>
5	16.	All Af	Sected Property Addresses:
6		4131 N	E Neotsu Drive, Neotsu, OR 97364
7	17.		t Mailing Address:
8		c/o Ke	n Browning ler Rohrback LLP, Stoll Berne, and Edelson PC
9		Suite 1	
10	18.	Portlar Fire Na	d, OR 97204
11	18.		Echo Mountain Complex
12			Santiam Canyon
13			South Obenchain
14			242
15			III. CATEGORIES OF INJURIES
16			
17	19.	_	f(s) allege(s) Defendants caused them the following categories of injury:
18			Bodily injuries
19		$\boxtimes$	Emotional distress, including mental suffering, inconvenience,
20		_	interference with normal and usual activities.
21			Loss of consortium
22			Primary residence total loss
23			Primary residence partial loss
24			Smoke and ash damage
25			Secondary residence
26	age and/or fo prejudicing 1 MASS SHORT STOLL STOLL BERNE LC 209 S.W. C	Or whom the party FFORM FFORM SKTING & SHI DAK STREET OREGON 972	1201 THIRD AVENUE, SUITE 3400     350 N. LASALLE ST., 14TH FLOOR       04     SEATTLE, WA 98101     CHICAGO, IL 60654

1			Other structures total loss
2			Other structures partial loss
3			Real property improvements (fences, roads, well, septic system, etc.)
4			destroyed
5			Real property improvements (fences, roads, well, septic system, etc.)
6			damaged
7			Personal property damaged or destroyed
8			Renter total loss
9			Renter partial loss
10		$\boxtimes$	Damage to timber, trees, crops, livestock, animals, or vegetation
11			
12			IV. DAMAGES
13	20.	Plaint	ff(s) allege(s) the following damages from the Master Complaint caused by
14	Defendants:		
15	А.	Categ	ories of Damages Sought
16		$\boxtimes$	Damage to real property
17			Loss of personal property
18		$\boxtimes$	Lost wages or impairment of earning capacity, and/or business profits or
19			proceeds and/or any related displacement expenses
20		$\boxtimes$	Loss of timber, trees, crops, livestock, animals, or vegetation
21		$\boxtimes$	Lost business profits or proceeds
22		$\boxtimes$	Alternative living or displacement expenses
23			Past and future medical expenses and incidental expenses
24		$\boxtimes$	Emotional distress including mental suffering, inconvenience, interference
25			with normal and usual activities
26			Loss of consortium
		$\boxtimes$	Any other loss, expenses, costs, or damages
	STOLL STOLL BERNE LC	OKTING & SH DAK STREET OREGON 97	1201 THIRD AVENUE, SUITE 3400350 N. LASALLE ST., 14TH FLOOR204SEATTLE, WA 98101CHICAGO, IL 60654

1		🖾 Cos	sts			
2		☑ Pre- and post-judgment interest				
3		🛛 Dou	$\boxtimes$ Double the amount of economic and property damages			
4		⊠ Fur	☑ Further relief as the Court deems equitable and just			
5	B.	Amount of Damages Sought				
6	21.	Plaintiff(s) suffered economic damages in an amount not to exceed \$5 million.				
7	22.	Plaintiff(s) suffered non-economic damages in an amount not to exceed \$25				
8		million.				
9	C.	Punitive Damages Sought 🖂				
10	23.	0.25 times	the amount of e	conomic and noneconomic damages.		
11			V CAUSES O	F ACTION ASSEDTED		
12		V. CAUSES OF ACTION ASSERTED				
13	24.	The following Causes of Action asserted in the Master Complaint and the allegations and Phase I verdict with regard thereto are adopted into this				
14	Short Form	e				
15						
16		Check if Applicable	Cause of Action Number	Cause of Action		
17			Action	Cause of Action Negligence		
17 18		Applicable	Action Number			
17		Applicable	Action Number 1	Negligence		
17 18		Applicable	Action Number 1 2	Negligence Gross Negligence		
17 18 19		Applicable	Action Number 1 2 3	Negligence       Gross Negligence       Private Nuisance		
17 18 19 20		Applicable           □           □           □           □           □           □           □	Action Number 1 2 3 4	Negligence         Gross Negligence         Private Nuisance         Public Nuisance		
17 18 19 20 21	WHI	Applicable         □	Action Number           1           2           3           4           5           6	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass	for \$30	
17 18 19 20 21 22		Applicable	Action Number	NegligenceGross NegligencePrivate NuisancePublic NuisanceTrespassInjunction		
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	million toge	Applicable	Action Number 1 2 3 4 5 6 aintiff(s) pray(s) and post-judgme	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment against Defendants	f	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	million toge economic ar	Applicable	Action Number	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment against Defendants rent interest, costs, attorneys' fees, doubling of	f lef, and all	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	million toge economic ar	Applicable	Action Number	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment against Defendants rent interest, costs, attorneys' fees, doubling of RS 477.089, punitive damages, injunctive relief	f lef, and all	



Short-Form Complaint #1548 - David Sheridann

1				
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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH		
9	David Sheridann,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY		
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel. Plaintiff, by and through their undersigned counsel, alleges as follows:			
18				
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of		
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff		
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1548 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		David Sheridann		
8				
9		$\Box$ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		447 North Fawn Drive, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: David Sheridann		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1548 - 2 LOKTING & SHIACHTER P.C. . OAK STREET D, OREGON 97204 500 FAX (503) 227-6840 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		x         Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X   Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1548 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           , OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10         FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x         Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		$\overline{X}$ Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1548 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1548 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1549 - Patrick Galasso

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7 8		F THE STATE OF OREGON OF MULTNOMAH				
9	Patrick Galasso,					
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY				
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)				
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander				
13	PACIFICORP,					
15	Defendants.	JURY TRIAL DEMANDED				
16 17	The Plaintiff named below files this Shor					
18	determine Plaintiff's damages against Defendant					
19	Plaintiff, by and through their undersigne					
20		NCE OF EXISTING COMPLAINT AND 1 TRIAL				
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in				
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master				
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of					
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff				
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as				
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages				

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1549 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

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 SEATTLE, WA 98101

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1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if				
4	fully set forth	n herein.			
5		II. PLAINTIFF			
6	3.	Plaintiff Name:			
7		Patrick Galasso			
8					
9		□ Priority Plaintiff <sup>1</sup>			
10	4.	All Affected Property Addresses:			
11		7595 NE Viewcrest Court, Otis Oregon 97368			
12					
13	5.	Current Mailing Address: Patrick Galasso			
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue			
15		Suite 1900 Portland, OR 97204			
16					
17	6.	Fire Name:			
18		x         Echo Mountain Complex			
19		Santiam Canyon			
20		South Obenchain			
21					
22					
23					
24					
25					
26	age and/or to prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1549 - 2 .okting & shLaChter P.C. .Oak STREET .000 FAX (503) 227-6840 ELL (206) 623-1900 FAX (206) 623-3384 ELL (206) 623-1900 FAX (206) 623-3384			

1		III. CATEGORIES OF INJURIES		
2	7.	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3		x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		x         Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17		X         Personal property damaged or destroyed		
18	Renter total loss			
19		Renter partial loss		
20		X Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	COMPLAINT #6 - COMPLAINT #1549 - 3         EDELSON PC           XTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           AK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           DREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370		

1		x         Loss of personal property		
2		x Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		xCosts		
13		x Pre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		$\underline{x}$ Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1549 - 4         DKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR		

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1549 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1550 - Sharon Galasso

1						
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7	IN THE CIPCUIT COURT O	F THE STATE OF OREGON				
8	FOR THE COUNTY					
9	Sharon Galasso,					
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY				
11	V.	PLAINTIFFS)				
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander				
13	electric utility and assumed business name of PACIFICORP,					
14	Defendants.	JURY TRIAL DEMANDED				
15						
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to				
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.					
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:				
19		NCE OF EXISTING COMPLAINT AND				
20	PHASE	I I KIAL				
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in				
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master					
23	Complaint") into this Short Form Complaint as it	f fully set forth herein except any causes of				
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff					
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as					
26	discovery continues, and further reserves the right	nt to increase the total amount of damages				

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1550 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2.	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set forth	n herein.			
5		II. PLAINTIFF			
6	3.	Plaintiff Name:			
7		Sharon Galasso			
8					
9		$\Box \qquad \text{Priority Plaintiff}^1$			
10	4.	All Affected Property Addresses:			
11		7595 NE Viewcrest Court, Otis Oregon 97368			
12		06-10-31-CO-00900-00, Otis Oregon 97368			
13	5				
14	5.	Current Mailing Address: Sharon Galasso			
15		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue			
16		Suite 1900 Portland, OR 97204			
17	6.	Fire Name:			
18	0.				
19		1			
20		Santiam Canyon South Obenchain			
21		242			
22					
23					
24					
25					
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1550 - 2 .okTING & SHLACHTER P.C. .OAK STREET D, OREGON 97204 SEATTLE, WA 98101 S00 FAX (503) 227-6840 CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378			

1			III.	CATEGORIES OF INJU	RIES
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			following categories of injury:	
3	x     Bodily injuries				
4		X	Emotional	distress, including mental suff	ering, inconvenience,
5			interference	e with normal and usual activit	ties.
6			Loss of con	nsortium	
7		X	Primary res	sidence total loss	
8			Primary res	sidence partial loss	
9		X	Smoke and	ash damage	
10			Secondary	residence	
11		X	Other struc	tures total loss	
12		Χ	Other struc	tures partial loss	
13	xReal property improvements (fences, roads, well, septic system, etc.)			ds, well, septic system, etc.)	
14	destroyed				
15			Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged			
17	X   Personal property damaged or destroyed				
18	Renter total loss				
19			Renter part	ial loss	
20		X	Damage to	timber, trees, crops, livestock,	animals, or vegetation
21					
22				IV. DAMAGES	
23	8.	Plainti	ff alleges the	e following damages from the	Master Complaint caused by
24	Defendants:				
25	А.	Categ	ories of Dan	nages Sought	
26		X	Damage to	real property	
	STOLL STOLL BERNE LC 209 S.W.	OKTING & SH OAK STREET ), OREGON 972	LACHTER P.C. 204	<b>#6 – COMPLAINT #1550 - 3</b> KELLER ROHRBACK LL.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		x         Loss of personal property		
2		Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		xCosts		
13		x Pre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		x Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	10. Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE L	FORM COMPLAINT #6 – COMPLAINT #1550 - 4         DKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR		

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1550 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840
 TEL. (206) 623-1900

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1551 - Jeffrey Hall

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7 8		OF THE STATE OF OREGON OF MULTNOMAH				
9	Jeffrey Hall,					
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY				
11	V.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)				
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander				
13	electric utility and assumed business name of PACIFICORP,					
14 15	Defendants.	JURY TRIAL DEMANDED				
16 17 18	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne	s by and through the undersigned counsel.				
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL				
21		y reference the Fifth Amended Complaint in				
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master					
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of					
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff				
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as					
26	discovery continues, and further reserves the right	nt to increase the total amount of damages				

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1551 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Jeffrey Hall		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		264 North Westview Drive, Otis Oregon 97368		
12	_			
13	5.	Current Mailing Address: Jeffrey Hall		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent to the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1551 - 2</b> LOKTING & SHILACHTER P.C. OAK STREET D, OREGON 97204 600 FAX (503) 227-6840 <b>EDELSON PC</b> <b>EDELSON PC</b> <b>SEATTLE, WA 98101</b> TEL. (206) 623-1900 FAX (206) 623-3384 <b>EDELSON PC</b> <b>SEATTLE, WA 98101</b> TEL. (206) 623-1900 FAX (206) 623-3384 <b>EDELSON PC</b> <b>SEATTLE, WA 98101</b> TEL. (312) 589-6370 FAX (312) 589-6378		

1			III.	CATEGORIES OF INJU	JRIES
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:				
3	Bodily injuries				
4		x E	Emotional of	distress, including mental sur	ffering, inconvenience,
5		iı	nterference	with normal and usual activ	vities.
6			loss of con	sortium	
7		D P	rimary res	idence total loss	
8		<b>P</b>	rimary res	idence partial loss	
9		X S	moke and	ash damage	
10		X S	econdary 1	residence	
11			Other struct	cures total loss	
12			Other struct	tures partial loss	
13		X R	Real proper	ty improvements (fences, ro	ads, well, septic system, etc.)
14		d	estroyed		
15	Real property improvements (fences, roads, well, septic system, etc.)			ads, well, septic system, etc.)	
16		d	amaged		
17	X         Personal property damaged or destroyed				1
18	Renter total loss				
19		R	Renter parti	al loss	
20		X D	Damage to	timber, trees, crops, livestoc	k, animals, or vegetation
21					
22				IV. DAMAGES	
23	8.	Plaintiff	alleges the	e following damages from th	e Master Complaint caused by
24	Defendants:				
25	А.	Categor	ies of Dan	nages Sought	
26		X D	Damage to :	real property	
	STOLL STOLL BERNE LC 209 S.W. (	OKTING & SHLAC DAK STREET OREGON 97204	CHTER P.C.	<b>26 – COMPLAINT #1551 - 3</b> KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		x         Loss of personal property
2		X Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		X         Lost business profits or proceeds
6		Alternative living or displacement expenses
7		Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x       Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		$\overline{X}$ Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1551 - 4 DKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. EDELSON PC OAK STREET 1201 THIRD AVENUE, SUITE 3200 250 N.L.ASALLE ST. 14TH FLOOP
	209 3.W.	CAR STREET 1201 HIRD A VENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840
 TEL. (206) 623-1900
 FAX (206) 623-3384

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1551 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1552 - William Edward Klagge

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7	IN THE CIRCUIT COURT O	E THE STATE OF OPECON
8		OF MULTNOMAH
9	William Edward Klagge,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander
14 15	Defendants.	JURY TRIAL DEMANDED
16 17	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant	
18	Plaintiff, by and through their undersigne	
19		NCE OF EXISTING COMPLAINT AND
20		1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	25, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1552 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		William Edward Klagge		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		364 Northeast 4th Avenue, Mill City Oregon 97360		
12				
13	5.	Current Mailing Address: William Edward Klagge		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		Echo Mountain Complex		
19		x     Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W PORTLANI	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1552 - 2</b> OKTING & SHLACHTER P.C. OAK STREET DO FAX (503) 227-6840 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3	x     Bodily injuries			
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		x         Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		x         Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15	Real property improvements (fences, roads, well, septic system, etc.)			
16		damaged		
17	X   Personal property damaged or destroyed			
18		Renter total loss		
19		Renter partial loss		
20		X Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by		
24	Defendants:			
25	А.	Categories of Damages Sought		
26		X   Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	COMPLAINT #6 - COMPLAINT #1552 - 3         EDELSON PC           XTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           AK STREET         1201 THIRD AVENUE, SUITE 3200           SREGON 97204         SEATTLE, WA 98101           FAX (503) 227-6840         TEL. (206) 623-1900		

1		x         Loss of personal property		
2		Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		xCosts		
13		xPre- and post-judgment interest		
14		X         Double the amount of economic and property damages		
15		x Further relief as the Court deems equitable and just		
16	В.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1552 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           AGREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900		

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1552 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1553 - Loriann Sheridan

1		
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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON
8		OF MULTNOMAH
9	Loriann Sheridan,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander
14 15	Defendants.	JURY TRIAL DEMANDED
16 17	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant	
18	Plaintiff, by and through their undersigne	
19 20	I. INCORPORATION BY REFERE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
20		y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	•
23	Complaint") into this Short Form Complaint as i	
24	action from the James Fifth Amended Complain	
25	reserves the right to amend all portions of this co	
26	discovery continues, and further reserves the right	

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1553 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Loriann Sheridan	
8			
9		$\Box \qquad \text{Priority Plaintiff}^{I}$	
10	4.	All Affected Property Addresses:	
11		447 North Fawn Drive, Otis Oregon 97368	
12	_		
13	5.	Current Mailing Address: Loriann Sheridan	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x   Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21			
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BEINE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1553 - 2 LOKTING & SHIACHTER P.C. . OAK STREET D, OREGON 97204 500 FAX (503) 227-6840 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3	X     Bodily injuries			
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		XPrimary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15	Real property improvements (fences, roads, well, septic system, etc.)			
16		damaged		
17	X         Personal property damaged or destroyed			
18		Renter total loss		
19		Renter partial loss		
20		x         Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by		
24	Defendants:			
25	А.	Categories of Damages Sought		
26		X         Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1553 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           JOREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL (206) 623-1900		

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		xCosts
13		xPre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	В.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1553 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (206) 623-1900         FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1553 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1554 - Mark Hamrick

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7		F THE STATE OF OREGON	
8		OF MULTNOMAH	
9	Mark Hamrick,		
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY	
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)	
12	PACIFICORP, an Oregon corporation; and	Case Assigned to: Hon. Steffan Alexander	
13	PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to. 1101. Sterian Alexander	
14	Defendants.	JURY TRIAL DEMANDED	
15			
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to	
17		1 2	
18	determine Plaintiff's damages against Defendants by and through the undersigned counsel. Plaintiff, by and through their undersigned counsel, alleges as follows:		
19			
20	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in	
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master	
23	Complaint") into this Short Form Complaint as it	f fully set forth herein except any causes of	
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff	
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as	
26	discovery continues, and further reserves the right	nt to increase the total amount of damages	

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1554 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840
 TEL. (206) 623-1900

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as i	f	
4	fully set forth herein.		
5	II. PLAINTIFF		
6	3. Plaintiff Name:		
7	Mark Hamrick		
8			
9	□ Priority Plaintiff <sup>1</sup>		
10	4. All Affected Property Addresses:		
11	310 N Best View Dr, Otis Oregon 97368-9710		
12			
13	5. Current Mailing Address: Mark Hamrick		
14	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15	Suite 1900 Portland, OR 97204		
16			
17	6. Fire Name:		
18	x     Echo Mountain Complex		
19	Santiam Canyon		
20	South Obenchain		
21	242		
22			
23			
24			
25			
26	<ul> <li><sup>1</sup> For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation.</li> <li>MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1554 - 2</li> <li>STOLL STOLL BERNE LOKTING &amp; SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204</li> <li>TEL (503) 227-1600 FAX (503) 227-6840</li> <li>TEL (206) 623-1900 FAX (206) 623-3384</li> </ul>	of	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		x         Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		x         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		x Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		x Damage to real property
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1554 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           0, OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           100 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370

1		x Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		x Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		<b>x</b> Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x Costs
13		x Pre- and post-judgment interest
14		x Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
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		FORM COMPLAINT #6 - COMPLAINT #1554 - 4 OKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. EDELCOM DC

209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840 6 – COMPLAINT #1554 - 4 KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1554 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1555 - Ian McPhee

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7	IN THE CIRCUIT COURT O			
8	FOR THE COUNTY	OF MULTNOMAH		
9	Ian McPhee,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander		
14	PACIFICORP, Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.		
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:		
19 20	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL			
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff		
25	reserves the right to amend all portions of this co	mplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1555 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Ian McPhee		
8				
9		$\Box \qquad \text{Priority Plaintiff}^1$		
10	4.	All Affected Property Addresses:		
11		2963 Butte Falls Highway, Eagle Point Oregon 97524		
12	-			
13	5.	Current Mailing Address: Ian McPhee		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		Echo Mountain Complex		
19		Santiam Canyon		
20		x     South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1555 - 2</b> LOKTING & SHIACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 SEATTLE, WA 98101 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7.	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3		x         Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17	X         Personal property damaged or destroyed			
18		Renter total loss		
19		Renter partial loss		
20		Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1555 - 3           KNTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900		

1	x         Loss of personal property			
2	2 Lost wages or impairment of earning capacity, and/or business pro-			
3		proceeds and/or any related displacement expenses		
4		Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		xCosts		
13		xPre- and post-judgment interest		
14		X         Double the amount of economic and property damages		
15		x Further relief as the Court deems equitable and just		
16	В.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1555 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           N, OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           TEL. (206) 623-1900         FAX (206) 623-3384		

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1555 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840
 TEL. (206) 623-1900

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1556 - Tim Miller

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7	IN THE CIRCUIT COURT O	E THE STATE OF ODECON		
8	FOR THE COUNTY			
9	Tim Miller,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.		
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:		
19	I. INCORPORATION BY REFERE	NCE OF EXISTING COMPLAINT AND		
20	PHASE	1 TRIAL		
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1556 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set forth	n herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Tim Miller	
8			
9		$\Box \qquad \text{Priority Plaintiff}^1$	
10	4.	All Affected Property Addresses:	
11		22865 Jennie Road, Lyons Oregon 97358	
12			
13	5.	Current Mailing Address: Tim Miller	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		Echo Mountain Complex	
19		x     Santiam Canyon	
20		South Obenchain	
21			
22			
23			
24			
25			
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1556 - 2 OKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. OAK STREET 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 00 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC TEL. (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES	
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3	x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		xPrimary residence total loss	
8		Primary residence partial loss	
9		x         Smoke and ash damage	
10		Secondary residence	
11		X         Other structures total loss	
12		X         Other structures partial loss	
13		Real property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	X Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged		
17	X         Personal property damaged or destroyed		
18	Renter total loss		
19		Renter partial loss	
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8. Plaintiff alleges the following damages from the Master Complaint caused by		
24	Defendants:		
25	А.	Categories of Damages Sought	
26		X         Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1556 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           O FAX (503) 227-6840         SEATTLE, WA 98101           DI FAX (503) 227-6840         TEL. (206) 623-1900	

1		x         Loss of personal property	
2		Lost wages or impairment of earning capacity, and/or business profits or	
3		proceeds and/or any related displacement expenses	
4		X Loss of timber, trees, crops, livestock, animals, or vegetation	
5		Lost business profits or proceeds	
6		X         Alternative living or displacement expenses	
7		x         Past and future medical expenses and incidental expenses	
8		x         Emotional distress including mental suffering, inconvenience, interference	
9		with normal and usual activities	
10		Loss of consortium	
11		X Any other loss, expenses, costs, or damages	
12		xCosts	
13		x Pre- and post-judgment interest	
14		x         Double the amount of economic and property damages	
15		$\underline{x}$ Further relief as the Court deems equitable and just	
16	B.	Amount of Damages Sought	
17	9.	Plaintiff suffered economic damages in an amount not to exceed	
18		\$5,000,000.	
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed	
20		\$25,000,000.	
21	C.	Punitive Damages Sought x	
22	11.	0.25 times the amount of economic and noneconomic damages.	
23			
24			
25			
26			
	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1556 - 4         DKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR	

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1556 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840
 TEL. (206) 623-1900

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1557 - Tanya Mullen

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH		
9	Tanya Mullen,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY		
11	V.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)		
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander		
14 15	PACIFICORP, Defendants.	JURY TRIAL DEMANDED		
16 17 18	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne	s by and through the undersigned counsel.		
19 20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL		
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of		
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1557 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

11 1 1			
alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended			
Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
fully set forth	n herein.		
	II. PLAINTIFF		
3.	Plaintiff Name:		
	Tanya Mullen		
	□ Priority Plaintiff <sup>1</sup>		
4.	All Affected Property Addresses:		
	5422 Butte Falls Highway, Eagle Point Oregon 97524		
5.	Current Mailing Address: Tanya Mullen		
	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
	Suite 1900 Portland, OR 97204		
6.	Fire Name:		
	Echo Mountain Complex		
	Santiam Canyon		
	x         South Obenchain		
	242		
age and/or to prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANT	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1557 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 Keller ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 Keller ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 Keller ROHRBACK LL.P. SEATTLE, WA 98101 TEL. (312) 589-6370 FAX (312) 589-6378		
	Complaint ¶ 2. fully set forth 3. 4. 5. 6. <sup>1</sup> For purpose age and/or to prejudicing MASS SHORT STOLL STOLL BERNE L 2095.W. PORTLANT		

1			III.	CATEGORIES OF INJU	RIES
2	7.	Plainti	ff alleges De	efendants caused Plaintiff the f	following categories of injury:
3	Bodily injuries				
4		X	Emotional of	distress, including mental suff	ering, inconvenience,
5			interference	e with normal and usual activit	ties.
6			Loss of con	sortium	
7			Primary res	idence total loss	
8			Primary res	idence partial loss	
9		X	Smoke and	ash damage	
10		X	Secondary	residence	
11		Χ	Other struct	tures total loss	
12			Other struct	tures partial loss	
13		X	Real proper	ty improvements (fences, road	ds, well, septic system, etc.)
14			destroyed		
15			Real proper	ty improvements (fences, road	ds, well, septic system, etc.)
16			damaged		
17		X	Personal pre-	operty damaged or destroyed	
18			Renter total	lloss	
19			Renter parti	ial loss	
20		X	Damage to	timber, trees, crops, livestock,	animals, or vegetation
21					
22				IV. DAMAGES	
23	8.	Plainti	ff alleges the	e following damages from the	Master Complaint caused by
24	Defendants:				
25	А.	Catego	ories of Dan	nages Sought	
26		X	Damage to	real property	
	STOLL STOLL BERNE LC 209 S.W. C	OKTING & SHI OAK STREET , OREGON 972	LACHTER P.C. 204	<b>*6 – COMPLAINT #1557 - 3</b> KELLER ROHRBACK LL.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		x         Loss of personal property
2		$\overline{X}$ Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		Alternative living or displacement expenses
7		Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		xCosts
13		xPre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		X Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1557 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           TEL. (206) 623-1900         FAX (206) 623-3384

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1557 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1558 - Daniel Ohrt

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	
9	Daniel Ohrt,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19 20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1558 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended			
2	Complaint ¶	[236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set forth	n herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Daniel Ohrt		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		100 West Central Street, Gates Oregon 97346		
12				
13	5.	Current Mailing Address: Daniel Ohrt		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		Echo Mountain Complex		
19		x   Santiam Canyon		
20		South Obenchain		
21		242		
22				
23				
24				
25				
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1558 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 D, OREGON 972		

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3	x     Bodily injuries			
4		X Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		XPrimary residence total loss		
8		Primary residence partial loss		
9		X         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17		X         Personal property damaged or destroyed		
18		Renter total loss		
19		Renter partial loss		
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by		
24	Defendants:			
25	А.	Categories of Damages Sought		
26		X   Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	CORM COMPLAINT #6 – COMPLAINT #1558 - 3           KTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           O FAX (503) 227-6840         TEL. (206) 623-1900		

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		$\underline{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X Alternative living or displacement expenses
7		x         Past and future medical expenses and incidental expenses
8		X Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x   Costs
13		x Pre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE L 209 S.W.	FORM COMPLAINT #6 - COMPLAINT #1558 - 4         OKTING & SHLACHTER P.C.       KELLER ROHRBACK LL.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         D, OREGON 97204       SEATTLE, WA 98101

TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (503) 227-1600 FAX (503) 227-6840

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1558 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1559 - Megan Shaw

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	
9	Megan Shaw,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	V.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and	Case Assigned to: Hon. Steffan Alexander
13	PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to. 1101. Steffan Alexander
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19 20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	emplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1559 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Megan Shaw		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		1128 North River Bend Road, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Megan Shaw		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x     Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1559 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 1201 THIRD AVENUE, SUITE 3200 500 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3	X Bodily injuries			
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17		X         Personal property damaged or destroyed		
18		Renter total loss		
19		Renter partial loss		
20		Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by		
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1559 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           O FAX (503) 227-6840         TEL. (206) 623-1900		

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		X Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
		FORM COMPLAINT #6 – COMPLAINT #1559 - 4 DKTING & SHLACHTER P.C. KELLER ROHRBACK L.L.P. EDELSON PC
		DATING & SHLACHTER P.C.     KELEEK KOHKBACK LL.P.     EDELSON PC       OAK STREET     1201 THIRD AVENUE, SUITE 3200     350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1559 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
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 TEL. (206) 623-1900

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1560 - Gina Browning

1				
2				
3				
4	IN THE CIRCUIT COURT OF THE STATE OF OREGON			
5	FOR THE COUNTY OF MULTNOMAH			
6	GINA BROWNING,	Case No. 20CV33885 (Lead Case)		
7	Plaintiff,	Case Assigned to: Hon. Steffan Alexander		
8 9	V.	SHORT FORM COMPLAINT AND JURY DEMAND (GINA BROWNING)		
10	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	JURY TRIAL DEMANDED		
11	PACIFICORP,			
12 13	Defendants.			
14	The Plaintiff(s) named below file(s) this	Short Form Complaint and Jury Demand to		
15	determine Plaintiff(s) damages against Defendan	ts by and through the undersigned counsel.		
16	Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:			
17		NCE OF EXISTING COMPLAINT AND		
18	PHASE	1 TRIAL		
19	1. Plaintiff(s) expressly incorporate(	s) by reference the Fifth Amended Complaint in		
20	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
21	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
22	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff(s)		
23	reserve their right to amend and increase the tota	l amount of damages alleged and prayed for on		
24	behalf of the class. See, e.g., Fifth Amended Con	mplaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263,		
25	269, 271, 281; Prayer for Relief ¶¶ B., D.			
26	2. Plaintiff(s) expressly incorporate(	s) by reference the jury verdicts from Phase 1,		
	as if fully set forth herein.			
	MASS SHORT FORM COMPLAINT #6 – COM STOLL STOLL BERNE LOKTING & SHLACHTER P.C. KELLER ROHRBA	EDEL CON DC		

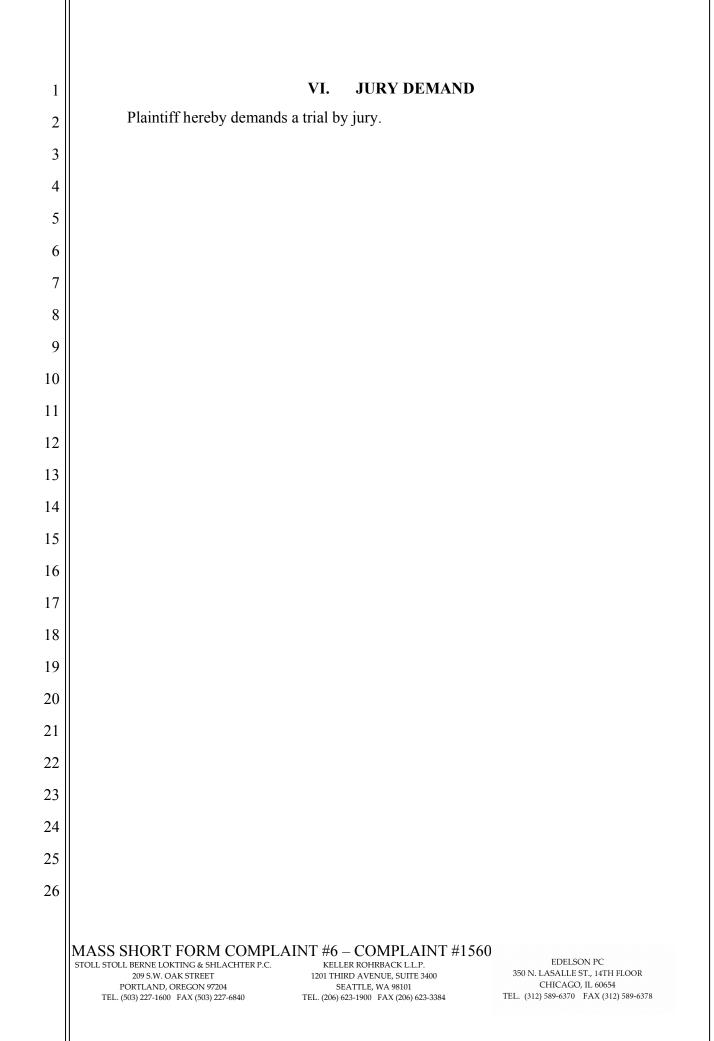
209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840 KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3400 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

1		II. PLAINTIFF(S)
2	3.	Plaintiff(s) Names:
3		Gina Browning
4		$\Box$ Priority Plaintiff <sup>1</sup>
5	4.	All Affected Property Addresses:
6		4131 NE Neotsu Drive, Neotsu, OR 97364
7	5.	Current Mailing Address:
8		Gina Browning c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
9		601 SW Second Avenue Suite 1900
10	C	Portland, OR 97204
11	6.	Fire Name:
12		Echo Mountain Complex
13		□ Santiam Canyon
14		□ South Obenchain
15		$\Box$ 242
16		III. CATEGORIES OF INJURIES
17	7.	Plaintiff(s) allege(s) Defendants caused them the following categories of injury:
18		□ Bodily injuries
19		$\boxtimes$ Emotional distress, including mental suffering, inconvenience,
20		interference with normal and usual activities.
21		$\Box$ Loss of consortium
22		□ Primary residence total loss
23		□ Primary residence partial loss
24		$\boxtimes$ Smoke and ash damage
25		
26	age and/or for	s of this short-form complaint, a priority plaintiff is a party who is over 70 years of or whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation.
	STOLL STOLL BERNE LC	C FORM COMPLAINT #6 – COMPLAINT #1560         Desting & Shlachter P.C.       Keller ROHRBACK LL.P.         Dak STREET       1201 THURD AVENUE SUITE 3400

209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

1		Secondary residence	
2		Other structures total loss	
3		Other structures partial loss	
4		Real property improvements (fences, roads, well, septic system	n, etc.)
5		destroyed	
6		Real property improvements (fences, roads, well, septic system	n, etc.)
7		damaged	
8		Personal property damaged or destroyed	
9		Renter total loss	
10		Renter partial loss	
11		Damage to timber, trees, crops, livestock, animals, or vegetation	on
12			
13		IV. DAMAGES	
14	8. Pl	tiff(s) allege(s) the following damages from the Master Complain	nt caused by
15	Defendants:		
16	A. Ca	gories of Damages Sought	
16 17	A. C:	gories of Damages Sought Damage to real property	
17		Damage to real property	s profits or
17 18		Damage to real property Loss of personal property	s profits or
17 18 19		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business	s profits or
17 18 19 20		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business proceeds and/or any related displacement expenses	s profits or
17 18 19 20 21		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation	s profits or
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds	s profits or
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds Alternative living or displacement expenses	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds Alternative living or displacement expenses Past and future medical expenses and incidental expenses	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>		Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds Alternative living or displacement expenses Past and future medical expenses and incidental expenses Emotional distress including mental suffering, inconvenience,	

1		🛛 Any	y other loss, exp	enses, costs, or damage	s	
2		⊠ Cos	sts			
3		⊠ Pre-	- and post-judgn	nent interest		
4		<b>Dou</b>	ıble the amount	of economic and prope	rty damages	
5		Further relief as the Court deems equitable and just				
6	B.	Amount of	Amount of Damages Sought			
7	9.	Plaintiff(s)	Plaintiff(s) suffered economic damages in an amount not to exceed \$5 million.			
8	10.	Plaintiff(s)	suffered non-ec	onomic damages in an	amount not to exceed	d \$25
9		million.				
10	C.	Punitive D	amages Sought	t 🛛		
11	11.	0.25 times	the amount of e	conomic and noneconor	mic damages.	
12			V. CAUSE	S OF ACTION ASSE	RTED	
13	12.	The follow	ing Causes of A	ction asserted in the Ma	aster Complaint and	the
14	allegations a	and Phase I ve	rdict with regard	l thereto are adopted int	to this Short Form C	omplaint:
15						
15						
16		Check if Applicable	Cause of Action Number	Cause of	Action	
16 17			Action	Cause of Negligence	Action	
16		Applicable	Action Number		Action	
16 17		Applicable	Action Number 1	Negligence	Action	
16 17 18		Applicable	Action Number 1 2	Negligence Gross Negligence	Action	
16 17 18 19		Applicable ⊠ ⊠	Action Number 1 2 3	Negligence Gross Negligence Private Nuisance	Action	
16 17 18 19 20		Applicable	Action Number 1 2 3 4	Negligence Gross Negligence Private Nuisance Public Nuisance	Action	
16 17 18 19 20 21	WHI	Applicable         □	Action Number           1           2           3           4           5           6	NegligenceGross NegligencePrivate NuisancePublic NuisanceTrespass		s for
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>		Applicable	Action Number 1 2 3 4 5 6 aintiff(s) pray(s)	NegligenceGross NegligencePrivate NuisancePublic NuisanceTrespassInjunction	nt against Defendants	
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	\$30,000,000	Applicable	Action Number 1 2 3 4 5 6 aintiff(s) pray(s) a pre and post-ju	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment	nt against Defendants attorneys' fees, doub	oling of
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	\$30,000,000 economic ar	Applicable	Action Number 1 2 3 4 5 6 aintiff(s) pray(s) a pre and post-ju mages under OF	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment dgment interest, costs, and provide the set of the set	nt against Defendants attorneys' fees, doub mages, injunctive re	oling of lief, and
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	\$30,000,000 economic ar	Applicable	Action Number 1 2 3 4 5 6 aintiff(s) pray(s) a pre and post-ju mages under OF	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment         dgment interest, costs, and costs, and costs         RS 477.089, punitive data	nt against Defendants attorneys' fees, doub mages, injunctive re	oling of lief, and



Short-Form Complaint #1561 - Mark Schachtsick

1 2 3 4 5 6 7		
8		PF THE STATE OF OREGON Y OF MULTNOMAH
9	Mark Schachtsick,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander
14 15	Defendants.	JURY TRIAL DEMANDED
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>		s by and through the undersigned counsel.
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1561 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Mark Schachtsick		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		51029 Greenway Drive, Gates Oregon 97346		
12				
13	5.	Current Mailing Address: Mark Schachtsick		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		Echo Mountain Complex		
19		x   Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAN	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent to the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1561 - 2</b> LOKING & SHLACHTER P.C. OAK STREET D, OREGON 97204 600 FAX (503) 227-6840 <b>TEL.</b> (206) 623-1900 FAX (206) 623-3384 <b>EDELSON PC</b> SEATTLE, WA 98101 <b>TEL.</b> (206) 623-1900 FAX (206) 623-3384 <b>EDELSON PC</b> 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES	
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3		X Bodily injuries	
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		Primary residence total loss	
8		x Primary residence partial loss	
9		X Smoke and ash damage	
10		Secondary residence	
11		X Other structures total loss	
12		Other structures partial loss	
13		X Real property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged	
17	X         Personal property damaged or destroyed		
18	Renter total loss		
19		Renter partial loss	
20		X Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		X   Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	DRM COMPLAINT #6 – COMPLAINT #1561 - 3           TING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           KK STREET         1201 THIRD AVENUE, SUITE 3200           REGON 97204         SEATTLE, WA 98101           FAX (503) 227-6840         TEL. (206) 623-1900	

1		x         Loss of personal property		
2		Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		xPre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		x Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
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	STOLL STOLL BERNE L 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1561 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384		

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1561 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1562 - Logan Johnson

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7 8		F THE STATE OF OREGON OF MULTNOMAH
9	Logan Johnson,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	v.	PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander
14 15	Defendants.	JURY TRIAL DEMANDED
16 17 18	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne	s by and through the undersigned counsel.
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	25, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1562 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Logan Johnson		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		296 North Deer Valley Road, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Logan Johnson		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900		
16		Portland, OR 97204		
17	6.	Fire Name:		
18				
19		x         Echo Mountain Complex		
20		Santiam Canyon		
21		South Obenchain		
22		242		
23				
24				
25				
26	age and/or for prejudicing 1 MASS SHORT F STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	s of this short-form complaint, a priority plaintiff is a party who is over 70 years of or whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>CORM COMPLAINT #6 - COMPLAINT #1562 - 2</b> IXTING & SHLACHTER P.C. DAK STREET OREGON 97204 D FAX (503) 227-6840 KELLER ROHRBACK LL.P. I201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. I201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. I201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. I201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384		

1		III. CATEGORIES OF INJURIES	
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:	
3		x     Bodily injuries	
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		Primary residence total loss	
8		Primary residence partial loss	
9		x         Smoke and ash damage	
10		Secondary residence	
11		Other structures total loss	
12		Other structures partial loss	
13		Real property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged	
17	Personal property damaged or destroyed		
18	Renter total loss		
19		Renter partial loss	
20		Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. ( PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1562 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           OF FAX (503) 227-6840         TEL. (206) 623-1900	

1		Loss of personal property		
2	Lost wages or impairment of earning capacity, and/or business profits or			
3		proceeds and/or any related displacement expenses		
4		Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		xCosts		
13		XPre- and post-judgment interest		
14		X         Double the amount of economic and property damages		
15		xFurther relief as the Court deems equitable and just		
16	В.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	С.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1562 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900		

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1562 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1563 - Vitalia Robins

1 2			
3			
4			
5			
6			
7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON	
8		OF MULTNOMAH	
9	Vitalia Robins,		
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY	
11	v.	PLAINTIFFS)	
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander	
14 15	Defendants.	JURY TRIAL DEMANDED	
16 17	The Plaintiff named below files this Shor		
18	determine Plaintiff's damages against Defendant		
19	Plaintiff, by and through their undersigned counsel, alleges as follows:		
20	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in	
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master	
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of	
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff	
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as	
26	discovery continues, and further reserves the right	nt to increase the total amount of damages	

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1563 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Vitalia Robins		
8				
9		$\Box \qquad \text{Priority Plaintiff}^1$		
10	4.	All Affected Property Addresses:		
11		24368 Taylor Park Road SE, Lyons Oregon 97358		
12				
13	5.	Current Mailing Address: Vitalia Robins		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900		
16		Portland, OR 97204		
17	6.	Fire Name:		
18				
19		Echo Mountain Complex		
20		x Santiam Canyon		
21		South Obenchain		
22		242		
23				
24				
25				
26	age and/or is prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANI	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1563 - 2 LOKTING & SHLACHTER P.C. LOKTING & SHLACHTER P.C. LOX STREET D, OREGON 97204 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378		

1			III.	CATEGORIES OF INJU	RIES
2	7.	Plainti	iff alleges De	efendants caused Plaintiff the f	following categories of injury:
3		X	Bodily inju	ries	
4		X	Emotional	distress, including mental suff	ering, inconvenience,
5			interference	e with normal and usual activit	ties.
6			Loss of con	asortium	
7			Primary res	sidence total loss	
8		X	Primary res	idence partial loss	
9		X	Smoke and	ash damage	
10			Secondary	residence	
11		X	Other struct	tures total loss	
12			Other struct	tures partial loss	
13		X	Real proper	rty improvements (fences, road	ds, well, septic system, etc.)
14			destroyed		
15			Real proper	rty improvements (fences, road	ds, well, septic system, etc.)
16			damaged		
17		X	Personal pr	operty damaged or destroyed	
18			Renter total	lloss	
19			Renter part	ial loss	
20		X	Damage to	timber, trees, crops, livestock,	animals, or vegetation
21					
22				IV. DAMAGES	
23	8.	Plainti	iff alleges the	e following damages from the	Master Complaint caused by
24	Defendants:				
25	А.	Categ	ories of Dan	nages Sought	
26		X	Damage to	real property	
	STOLL STOLL BERNE LC 209 S.W.	OKTING & SH OAK STREET , OREGON 972	ILACHTER P.C. 204	<b>#6 – COMPLAINT #1563 - 3</b> KELLER ROHRBACK LL.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		$\boxed{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		xCosts
13		xPre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	В.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1563 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (206) 623-1900         FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1563 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1564 - K&K Quality Construction LLC

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8		F THE STATE OF OREGON OF MULTNOMAH
9	K&K Quality Construction LLC,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	
18	Plaintiff, by and through their undersigne	
19		NCE OF EXISTING COMPLAINT AND
20		1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1564 - 1 KELLER ROHRBACK L.L.P. STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 207 S.W. OAK STREET PORTLAND, OREGON 97204 (502) 207 1 (20. 5 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (503) 227-1600 FAX (503) 227-6840

1	alleged and r	prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort			
5		II. PLAINTIFF		
6	2			
7	3.	Plaintiff Name: K&K Quality Construction LLC		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11	1.	438 North Yodel Lane, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Kaeleen Holmgren		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC		
15		601 SW Second Avenue Suite 1900		
16		Portland, OR 97204		
17	6.	Fire Name:		
18		x         Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21		242		
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent g the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1564 - 2 LOKTING & SHLACHTER P.C. V. OAK STREET D, OREGON 97204 EDELSON PC SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		Bodily injuries
4		Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		X         Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. 0 PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1564 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property
2		$\boxed{\mathbf{x}}$ Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		Alternative living or displacement expenses
7		Past and future medical expenses and incidental expenses
8		Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		Any other loss, expenses, costs, or damages
12		x   Costs
13		x Pre- and post-judgment interest
14		X Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$500,000.
19		
20		
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1564 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           DFAX (503) 227-6840         TEL. (206) 623-1900           FAX (206) 623-1900         FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$500,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1564 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1565 - Michael Adee

1		
2		
3		
4		
5		
6		
7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	
9	Michael Adee,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16 17	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
10	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as it	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1565 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Michael Adee		
8				
9		$\Box \qquad \text{Priority Plaintiff}^1$		
10	4.	All Affected Property Addresses:		
11		119 East Sorbin Street, Gates Oregon 97346		
12				
13	5.	Current Mailing Address: Michael Adee		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		Echo Mountain Complex		
19		x   Santiam Canyon		
20		South Obenchain		
21		242		
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent is the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1565 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 SOU FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (212) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		X   Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1565 - 3           KNTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X Alternative living or displacement expenses
7		Past and future medical expenses and incidental expenses
8		X Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x Any other loss, expenses, costs, or damages
12		XCosts
13		x         Pre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	В.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	CORM COMPLAINT #6 - COMPLAINT #1565 - 4           KTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           VAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           OREGON 97204         SEATTLE, WA 98101           OF FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900

TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1565 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840
 TEL. (206) 623-1900

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1566 - Darla Schachtsick

1 2 3 4 5 6 7						
8		F THE STATE OF OREGON OF MULTNOMAH				
9	Darla Schachtsick,					
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY				
11	V.	PLAINTIFFS)				
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander				
14 15	Defendants.	JURY TRIAL DEMANDED				
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne I. INCORPORATION BY REFERE	The Plaintiff named below files this Short Form Complaint and Jury Demand to rmine Plaintiff's damages against Defendants by and through the undersigned counsel. Plaintiff, by and through their undersigned counsel, alleges as follows: I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL				
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in				
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master					
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of					
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff				
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as					
26	discovery continues, and further reserves the right	nt to increase the total amount of damages				

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1566 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set forth	orth herein.			
5		II. PLAINTIFF			
6	3.	Plaintiff Name:			
7		Darla Schachtsick			
8					
9		$\Box$ Priority Plaintiff <sup>1</sup>			
10	4.	All Affected Property Addresses:			
11		51029 Greenway Drive, Gates Oregon 97346			
12					
13	5.	Current Mailing Address: Darla Schachtsick			
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue			
15		Suite 1900 Portland, OR 97204			
16					
17	6.	Fire Name:			
18		Echo Mountain Complex			
19		x   Santiam Canyon			
20		South Obenchain			
21					
22					
23					
24					
25					
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1566 - 2 LOKTING & SHIACHTER P.C. . OAK STREET 0.0AK STREET 0.0AK STREET 1201 THIRD AVENUE, SUITE 3200 500 FAX (503) 227-6840 TEL (206) 623-1900 FAX (206) 623-3384 TEL (312) 589-6370 FAX (312) 589-6378			

1			III.	CATEGORIES OF INJU	RIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3		X	Bodily inju	ries	
4		X	Emotional	distress, including mental suff	ering, inconvenience,
5			interference	e with normal and usual activity	ties.
6			Loss of consortium		
7			Primary residence total loss		
8		X	Primary residence partial loss		
9		x Smoke and ash damage			
10			Secondary	residence	
11		X	Other struc	tures total loss	
12			Other struc	tures partial loss	
13		X	Real proper	rty improvements (fences, road	ds, well, septic system, etc.)
14			destroyed		
15			Real proper	rty improvements (fences, road	ds, well, septic system, etc.)
16			damaged		
17		X	Personal pr	operty damaged or destroyed	
18			Renter total	l loss	
19			Renter part	ial loss	
20		Χ	Damage to	timber, trees, crops, livestock,	, animals, or vegetation
21					
22				IV. DAMAGES	
23	8.	Plaintif	ff alleges the	e following damages from the	Master Complaint caused by
24	Defendants:				
25	А.	Catego	ories of Dan	nages Sought	
26		X	Damage to	real property	
	STOLL STOLL BERNE LC 209 S.W.	OKTING & SHL OAK STREET , OREGON 972(	ACHTER P.C.	<b>#6 – COMPLAINT #1566 - 3</b> KELLER ROHRBACK LL.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1		x         Loss of personal property		
2		x Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		xPre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		$\underline{x}$ Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
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26				
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	EFORM COMPLAINT #6 - COMPLAINT #1566 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           Y, OREGON 97204         SEATTLE, WA 98101           D0 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384		

TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1566 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1567 - Milo Fletcher

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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON		
8	FOR THE COUNTY	OF MULTNOMAH		
9	Milo Fletcher,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.		
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19	I. INCORPORATION BY REFERE	NCE OF EXISTING COMPLAINT AND		
20	PHASE	1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1567 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set forth	n herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Milo Fletcher		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		994 North Glenview Loop, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Milo Fletcher		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16	6	<b>D</b> ' <b>N</b>		
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1567 - 2</b> OKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7.	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3		X         Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17	X         Personal property damaged or destroyed			
18		Renter total loss		
19		Renter partial loss		
20		Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1567 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           OF FAX (503) 227-6840         TEL. (206) 623-1900		

1	x     Loss of personal property			
2		x Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		Loss of timber, trees, crops, livestock, animals, or vegetation		
5		x         Lost business profits or proceeds		
6		X Alternative living or displacement expenses		
7		X Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		x Pre- and post-judgment interest		
14		X         Double the amount of economic and property damages		
15		$\underline{x}$ Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	11. 0.25 times the amount of economic and noneconomic damages.		
23				
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	STOLL STOLL BERNE L 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1567 - 4           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OK FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         CHICAGO, IL 60654		

TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1567 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1568 - Erin Bodily

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7 8		OF THE STATE OF OREGON OF MULTNOMAH		
9	Erin Bodily,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14 15	Defendants.	JURY TRIAL DEMANDED		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.		
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19 20	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL			
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1568 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

	11 1 1		
1	alleged and prayed for individually and/or on behalf of the class. <i>See, e.g.</i> , Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set forth	herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Erin Bodily	
8			
9		$\Box$ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		40216 North Dogwood Road, Mill City Oregon 97360	
12			
13	5.	Current Mailing Address: Erin Bodily	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		Echo Mountain Complex	
19		X     Santiam Canyon	
20		South Obenchain	
21		242	
22			
23			
24			
25			
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 2005.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1568 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 CHICAGO, IL (206) 623-1900 CHICAGO, IL (206) 623-3384 CHICAGO, IL (312) 589-6370 CHICAGO, IC (312) 589-6378	

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3		x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		x         Primary residence partial loss		
9		X         Smoke and ash damage		
10		Secondary residence		
11		X         Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged			
17	X         Personal property damaged or destroyed			
18	Renter total loss			
19		Renter partial loss		
20		X Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		x   Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1568 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           0 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370		

1	x     Loss of personal property			
2	2 Lost wages or impairment of earning capacity, and/or business profi			
3	3 proceeds and/or any related displacement expenses			
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		xPre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15	x Further relief as the Court deems equitable and just			
16	В.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1568 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           TEL. (206) 623-1900         FAX (206) 623-3384		

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1568 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1569 - John Bodily

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7		F THE STATE OF OREGON		
8	FOR THE COUNTY	OF MULTNOMAH		
9	John Bodily,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.		
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19		NCE OF EXISTING COMPLAINT AND		
20	PHASE	1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of		
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1569 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1		prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended
2	Complaint ¶	[236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if
4	fully set forth	n herein.
5		II. PLAINTIFF
6	3.	Plaintiff Name:
7		John Bodily
8		
9		$\Box \qquad \text{Priority Plaintiff}^1$
10	4.	All Affected Property Addresses:
11		40216 North Dogwood Road, Mill City Oregon 97360
12	_	
13	5.	Current Mailing Address: John Bodily
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue
15		Suite 1900 Portland, OR 97204
16		
17	6.	Fire Name:
18		Echo Mountain Complex
19		x   Santiam Canyon
20		South Obenchain
21		
22		
23		
24		
25		
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1569 - 2 OKTING & SHLACHTER P.C. OAK STREET 00 FAX (503) 227-6840 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLEST, 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 KELLEST, 1420 KELLEST, 1420 KELE

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		XPrimary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		XOther structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		XDamage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X   Damage to real property
	STOLL STOLL BERNE LC 209 S.W. ( PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1569 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           J, OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           ID FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X Alternative living or displacement expenses
7		X Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1569 - 4           OKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           0, OREGON 97204         SEATTLE, WA 98101           00 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900

TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1569 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1570 - Joseph Bones

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7	IN THE CIRCUIT COURT O	Ε ΤΗΕ ΥΤΑΤΕ ΟΕ ΟΡΕΟΟΝ
8	FOR THE COUNTY	
9	Joseph Bones,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19		NCE OF EXISTING COMPLAINT AND
20	PHASE	ITRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as in	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	mplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1570 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

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	brayed for individually and/or on behalf of the class. See, e.g., Fifth Amended
	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.
2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if
fully set forth	h herein.
	II. PLAINTIFF
3.	Plaintiff Name:
	Joseph Bones
	□ Priority Plaintiff <sup>1</sup>
4.	All Affected Property Addresses:
	457 North Pleasure Drive, Otis Oregon 97368
5.	Current Mailing Address: Joseph Bones
	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue
	Suite 1900 Portland, OR 97204
6.	Fire Name:
	x         Echo Mountain Complex
	Santiam Canyon
	South Obenchain
	242
age and/or prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W PORTLANT	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1570 - 2</b> OAK STREET 1201 THIRD AVENUE, SUITE 3200 So, OREGON 97204 SEATTLE, WA 98101 Sea TTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 EXEMPLE SUITE 3200 Sea TTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 EXEMPLE SUITE 3200 Sea TTLE, WA 98101 TEL. (312) 589-6370 FAX (312) 589-6378
	Complaint ¶ 2. fully set forth 3. 4. 5. 6. <sup>1</sup> For purpose age and/or prejudicing MASS SHL BERNET STOLL STOLL BERNET 209 S.W PORTLANT

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1570 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           OF FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x Costs
13		xPre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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26		
	STOLL STOLL BERNE L 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1570 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           , OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10         FAX (503) 227-6840         TEL. (206) 623-3384         TEL. (312) 589-6370         FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1570 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1571 - Nancy Chase

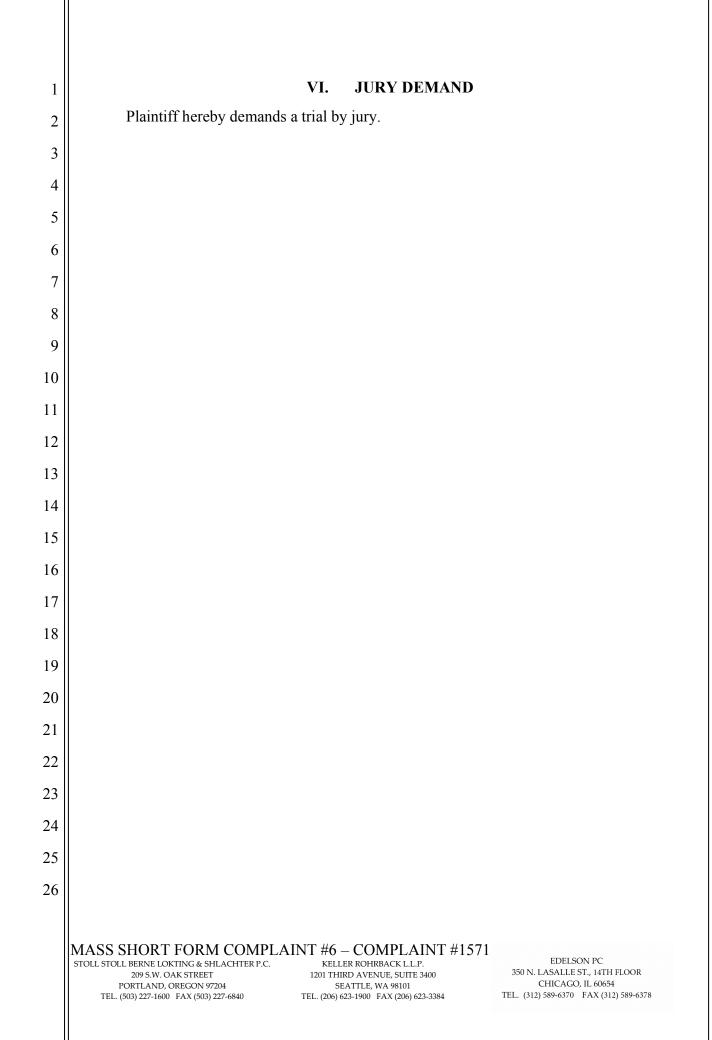
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2		
3		
4	IN THE CIRCUIT COURT C	F THE STATE OF OREGON
5	FOR THE COUNTY	OF MULTNOMAH
6	Nancy Chase,	Case No. 20CV33885 (Lead Case)
7	Plaintiff,	Case Assigned to: Hon. Steffan Alexander
8 9	V.	SHORT FORM COMPLAINT AND JURY DEMAND (GINA BROWNING)
10	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	JURY TRIAL DEMANDED
11	electric utility and assumed business name of PACIFICORP,	
12	Defendants.	
13		
14	The Plaintiff(s) named below file(s) this	Short Form Complaint and Jury Demand to
15	determine Plaintiff(s) damages against Defendan	ts by and through the undersigned counsel.
16	Plaintiff(s), by and through their undersig	gned counsel, allege(s) as follows:
17		NCE OF EXISTING COMPLAINT AND 1 TRIAL
18		
19		s) by reference the Fifth Amended Complaint in
20	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
21	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
22	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff(s)
23	reserve their right to amend and increase the tota	l amount of damages alleged and prayed for on
24	behalf of the class. See, e.g., Fifth Amended Co	mplaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263,
25	269, 271, 281; Prayer for Relief ¶¶ B., D.	
26	2. Plaintiff(s) expressly incorporate(	s) by reference the jury verdicts from Phase 1,
	as if fully set forth herein.	
	MASS SHORT FORM COMPLAINT #6 – COM	PLAINT #1571 '
	STOLL STOLL BERNE LOKTING & SHLACHTER P.C.KELLER ROHRBA209 S.W. OAK STREET1201 THIRD AVENUEPORTLAND, OREGON 97204SEATTLE, WATEL. (503) 227-1600FAX (503) 227-6840TEL. (206) 623-1900	5, SUITE 3400 350 N. LASALLE ST., 14TH FLOOR 98101 CHICAGO, IL 60654

1		II. PLAINTIFF(S)
2	3.	Plaintiff(s) Names:
3		Nancy Chase
4		$\Box$ Priority Plaintiff <sup>1</sup>
5	4.	All Affected Property Addresses:
6		2034 Salmon River Highway, Otis, OR 97368
7	5.	Current Mailing Address:
8		Nancy Chase c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
9		601 SW Second Avenue Suite 1900
10		Portland, OR 97204
11	6.	Fire Name:
12		Echo Mountain Complex
13		□ Santiam Canyon
14		□ South Obenchain
15		$\Box$ 242
16		III. CATEGORIES OF INJURIES
17	7.	Plaintiff(s) allege(s) Defendants caused them the following categories of injury:
18		□ Bodily injuries
19		$\boxtimes$ Emotional distress, including mental suffering, inconvenience,
20		interference with normal and usual activities.
21		□ Loss of consortium
22		□ Primary residence total loss
23		□ Primary residence partial loss
24		Smoke and ash damage
25		
26	age and/or for	s of this short-form complaint, a priority plaintiff is a party who is over 70 years of or whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation.
	STOLL STOLL BERNE LC	C FORM COMPLAINT #6 – COMPLAINT #1571 DKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. DAK STRFET 1201 THIRD AVENUE SUITE 3400 S50 N. LASALLE ST., 14TH FLOOR

209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

1			Secondary residence
2		$\boxtimes$	Other structures total loss
3			Other structures partial loss
4		$\boxtimes$	Real property improvements (fences, roads, well, septic system, etc.)
5			destroyed
6			Real property improvements (fences, roads, well, septic system, etc.)
7			damaged
8		$\boxtimes$	Personal property damaged or destroyed
9			Renter total loss
10			Renter partial loss
11		$\boxtimes$	Damage to timber, trees, crops, livestock, animals, or vegetation
12			
13			IV. DAMAGES
14	8.	Plainti	ff(s) allege(s) the following damages from the Master Complaint caused by
15	Defendants:		
16	А.	Categ	ories of Damages Sought
16 17		Categ	ories of Damages Sought Damage to real property
		_	
17		$\boxtimes$	Damage to real property
17 18		$\boxtimes$	Damage to real property Loss of personal property
17 18 19		$\boxtimes$	Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or
17 18 19 20			Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses
17 18 19 20 21			Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>			Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>			Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds Alternative living or displacement expenses
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>			Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds Alternative living or displacement expenses Past and future medical expenses and incidental expenses
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>			Damage to real property Loss of personal property Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses Loss of timber, trees, crops, livestock, animals, or vegetation Lost business profits or proceeds Alternative living or displacement expenses Past and future medical expenses and incidental expenses Emotional distress including mental suffering, inconvenience, interference

1		🛛 Any	v other loss, exp	enses, costs, or damage	es	
2		⊠ Costs				
3		☑ Pre- and post-judgment interest				
4		☑ Double the amount of economic and property damages				
5		⊠ Fur	☑ Further relief as the Court deems equitable and just			
6	B.	Amount of Damages Sought				
7	9.	Plaintiff(s) suffered economic damages in an amount not to exceed \$5 million.				
8	10.	Plaintiff(s) suffered non-economic damages in an amount not to exceed \$25				
9		million.				
10	C.	C. Punitive Damages Sought 🖂				
11	11.	11. 0.25 times the amount of economic and noneconomic damages.				
12		V. CAUSES OF ACTION ASSERTED				
13	12. The following Causes of Action asserted in the Master Complaint and the					
14	allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:					
15						
15						
<mark>16</mark>		Check if Applicable	Cause of Action Number	Cause of	Action	
16 17			Action	Cause of Negligence	Action	
16 17 18		Applicable	Action Number		Action	
16 17		Applicable	Action Number 1	Negligence	Action	
16 17 18		Applicable	Action Number 1 2	Negligence Gross Negligence	Action	
16 17 18 19		Applicable	Action Number	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass	Action	
16 17 18 19 20		Applicable           □           □           □           □           □           □           □	Action Number 1 2 3 4	Negligence Gross Negligence Private Nuisance Public Nuisance	Action	
16 17 18 19 20 21	WHI	Applicable         □	Action Number           1           2           3           4           5           6	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass		s for \$30
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>		Applicable	Action Number	NegligenceGross NegligencePrivate NuisancePublic NuisanceTrespassInjunction	nt against Defendants	
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	million toge	Applicable	Action Number	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment	nt against Defendants neys' fees, doubling o	of
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	million toge economic ar	Applicable	Action Number	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment         ent interest, costs, attorn	nt against Defendants neys' fees, doubling o nmages, injunctive rei	of lief, and all
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	million toge economic ar	Applicable	Action Number	Negligence         Gross Negligence         Private Nuisance         Public Nuisance         Trespass         Injunction         ) for relief and judgment         ent interest, costs, attorn         RS 477.089, punitive data	nt against Defendants neys' fees, doubling o nmages, injunctive rei	of lief, and all



Short-Form Complaint #1572 - Winter Brunelle

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8	IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR THE COUNTY OF MULTNOMAH			
9	Winter Brunelle,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19		NCE OF EXISTING COMPLAINT AND		
20	PHASE	1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as i	· · · ·		
24	action from the James Fifth Amended Complain			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1572 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if				
4	fully set forth herein.				
5	II. PLAINTIFF				
6	3. Plaintiff Name:				
7	Winter Brunelle				
8					
9	$\Box \qquad \text{Priority Plaintiff}^1$				
10	4. All Affected Property Addresses:				
11	994 North Glenview Loop, Otis Oregon 97368				
12					
13	5 Comment Mailing Address				
14	5. Current Mailing Address: Winter Brunelle				
15	c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue				
16	Suite 1900 Portland, OR 97204				
17	6. Fire Name:				
18	X     Echo Mountain Complex				
19	Santiam Canyon				
20	South Obenchain				
21	$\square 242$				
22					
23					
24					
25 26					
26	<ul> <li><sup>1</sup> For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation.</li> <li>MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1572 - 2</li> <li>STOLL STOLL BERNE LOKTING &amp; SHLACHTER P.C. 209 S.W. OAK STREET</li> <li>PORTLAND, OREGON 97204</li> <li>TEL. (503) 227-1600 FAX (503) 227-6840</li> <li>TEL. (206) 623-1900 FAX (206) 623-3384</li> </ul>				

1		III. CATEGORIES OF INJURIES		
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3		x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		x     Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13	Real property improvements (fences, roads, well, septic system, etc.)			
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17		X         Personal property damaged or destroyed		
18	Renter total loss			
19		Renter partial loss		
20		XDamage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by		
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1572 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           00 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384         TEL. (312) 589-6370 FAX (312) 589-6378		

1		xLoss of personal property		
2		x Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		x         Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		x Pre- and post-judgment interest		
14		X Double the amount of economic and property damages		
15		x Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	DRM COMPLAINT #6 - COMPLAINT #1572 - 4           TIING & SHIACHTER P.C.         KELLER ROHRBACK L.L.P.           AK STREET         1201 THIRD AVENUE, SUITE 3200           DREGON 97204         SEATTLE, WA 98101           FAX (503) 227-6840         TEL. (206) 623-1900		

TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1572 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1573 - Emilee Robins

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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON
8		OF MULTNOMAH
9	Emilee Robins,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1573 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Emilee Robins		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		24368 Taylor Park Road SE, Lyons Oregon 97358		
12	_			
13	5.	Current Mailing Address: Emilee Robins		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		Echo Mountain Complex		
19	x   Santiam Canyon			
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1573 - 2</b> .okTING & SHLACHTER P.C. .OAK STREET .OAK STREET .oo FAX (503) 227-6840 .OO FAX (503) 227-6840 .OO FAX (503) 227-6840 .Complete Complete		

1		III. CATEGORIES OF INJURIES	
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:	
3	x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		Primary residence total loss	
8		Primary residence partial loss	
9		x         Smoke and ash damage	
10		Secondary residence	
11		Other structures total loss	
12		Other structures partial loss	
13		Real property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged		
17	X   Personal property damaged or destroyed		
18	Renter total loss		
19		Renter partial loss	
20		Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1573 - 3         EDELSON PC           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384         TEL. (312) 589-6370 FAX (312) 589-6378	

1		x         Loss of personal property		
2		Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		x         Any other loss, expenses, costs, or damages		
12		x Costs		
13		x Pre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		X Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
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	STOLL STOLL BERNE LO 209 S.W.	FORM COMPLAINT #6 – COMPLAINT #1573 - 4         DKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         OSTON       CASTILE WA 08101		

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1573 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1574 - Kevin Callaghan

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8	IN THE CIRCUIT COURT O FOR THE COUNTY	OF MULTNOMAH		
9	Kevin Callaghan,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19 20		NCE OF EXISTING COMPLAINT AND		
20		1 TRIAL		
21		y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388			
23 24	Complaint") into this Short Form Complaint as i			
24	action from the James Fifth Amended Complaint			
23 26	reserves the right to amend all portions of this co			
20	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1574 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Kevin Callaghan		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		438 North Yodel Lane, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Kevin Callaghan		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W PORTLANI	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1574 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 0.04K STREET 0.04K STREET 0.04K STREET 1201 THIRD AVENUE, SUITE 3200 0.07 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES	
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3	x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		Primary residence total loss	
8		Primary residence partial loss	
9		x         Smoke and ash damage	
10		Secondary residence	
11		Other structures total loss	
12		Other structures partial loss	
13		xReal property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged		
17	X         Personal property damaged or destroyed		
18	Renter total loss		
19		Renter partial loss	
20		x         Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		X         Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1574 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10         FAX (503) 227-6840         TEL. (206) 623-1300         FAX (206) 623-3384	

1	x     Loss of personal property			
2	2 X Lost wages or impairment of earning capacity, and/or business profits of			
3	proceeds and/or any related displacement expenses			
4		X Loss of timber, trees, crops, livestock, animals, or vegetation		
5		x         Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		xPre- and post-judgment interest		
14	X         Double the amount of economic and property damages			
15	$\underline{x}$ Further relief as the Court deems equitable and just			
16	B.	B. Amount of Damages Sought		
17	9.	9. Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11. 0.25 times the amount of economic and noneconomic damages.			
23				
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1574 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           00 FAX (503) 227-6840         TEL. (206) 623-1300           TEL. (206) 623-1900         FAX (206) 623-3384		

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1574 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1575 - Cherie Robertson-Girod

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH		
9	Cherie Robertson-Girod,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander		
14 15	PACIFICORP, Defendants.	JURY TRIAL DEMANDED		
16 17 18 19		s by and through the undersigned counsel. ed counsel, alleges as follows: NCE OF EXISTING COMPLAINT AND		
20 21	PHASE 1           1.         Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	Ĩ		
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the <i>James</i> Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1575 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set forth	n herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Cherie Robertson-Girod	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		825 Northwest Santiam Boulevard, Mill City Oregon 97360	
12			
13	5.	Current Mailing Address: Cherie Robertson-Girod	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		Echo Mountain Complex	
19		x     Santiam Canyon	
20		South Obenchain	
21			
22			
23			
24			
25			
26	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1575 - 2</b> OKTING & SHLACHTER P.C. KELLER ROHRBACK LL.P. OAK STREET 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 00 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		X         Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		x         Primary residence partial loss
9		X         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X   Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1575 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           0, OREGON 97204         SEATTLE, WA 98101           00 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384

1		x         Loss of personal property		
2	2 Lost wages or impairment of earning capacity, and/or business profits			
3	proceeds and/or any related displacement expenses			
4		Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		X         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		x Costs		
13		x         Pre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		$\underline{X}$ Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE LO 209 S.W.	ORM COMPLAINT #6 – COMPLAINT #1575 - 4         KTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         DAK STREET       1201 THIRD AVENUE, SUITE 3200         OREGON 97204       SEATTLE, WA 98101		
		ORCCON 97204         SEATTLE, WA 90101         CHICAGO, IL 60654           ) FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL (312) 589-6370         FAX (312) 589-6378		

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1575 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1576 - John Bock

1		
2		
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4		
5		
6		
7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	
9	John Bock,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:
19 20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as it	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1576 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		John Bock	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		7883 Salmon River Highway, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: John Bock	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x   Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21		242	
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1576 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 OU FAX (503) 227-6840 MARCHAR COMPLAINT #1576 - 2 L (206) 623-1900 FAX (206) 623-3384 MARCHAR COMPLAINT #1576 - 2 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 MARCHAR COMPLAINT #1576 - 2 SEATTLE, WA 98101 MARCHAR COMPLAINT #1576 - 2 SEATTLE, WA 98101 MARC	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		XRenter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1576 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384         TEL. (312) 589-6370 FAX (312) 589-6378

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x         Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		x   Costs
13		xPre- and post-judgment interest
14		X Double the amount of economic and property damages
15		X Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	С.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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26		
	STOLL STOLL BERNE LC	FORM COMPLAINT #6 - COMPLAINT #1576 - 4         DOKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         DAK STREET       1201 THIRD AVENUE, SUITE 3200         1201 THIRD AVENUE, SUITE 3200       350 N.L.ASALLE ST. 14TH ELOOP
	20, 8,11,1	JAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1576 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1577 - Juan Collier

1		
2		
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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	
9	Juan Collier,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	6
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	d counsel, alleges as follows:
19 20	I. INCORPORATION BY REFERE PHASE	NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complaint	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	emplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1577 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Juan Collier	
8			
9		$\Box \qquad \text{Priority Plaintiff}^{1}$	
10	4.	All Affected Property Addresses:	
11		776 North Panther Creek Road, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: Juan Collier	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x   Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21		242	
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent is the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1577 - 2</b> LOKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 SEATTLE, WA 98101 SOU FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		x         Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X         Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1577 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           00 FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x Costs
13		xPre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		$\overline{x}$ Further relief as the Court deems equitable and just
16	В.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1577 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           TEL. (206) 623-1900         FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1577 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1578 - Gabriel David Voth

1 2 3 4 5 6 7		OF THE STATE OF OREGON
8 9	FOR THE COUNTY Gabriel David Voth,	OF MULTNOMAH
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander
14 15	Defendants.	JURY TRIAL DEMANDED
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>		s by and through the undersigned counsel.
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	85, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	
25 26	reserves the right to amend all portions of this co discovery continues, and further reserves the right	

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1578 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	[236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set forth	n herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Gabriel David Voth	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		11411 Rowena Avenue Southeast, Lyons Oregon 97358	
12			
13	5.	Current Mailing Address: Gabriel David Voth	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		Echo Mountain Complex	
19		x   Santiam Canyon	
20		South Obenchain	
21		242	
22			
23			
24			
25			
26	age and/or to prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1578 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 D, OREGON 972	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		xPrimary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		x         Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X         Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1578 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1300

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		$\boxed{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x         Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		X Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	С.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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26		
		FORM COMPLAINT #6 - COMPLAINT #1578 - 4         DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC
		DAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1578 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1579 - Brian McKillop

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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON		
8	FOR THE COUNTY			
9	Brian McKillop,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
18	Plaintiff, by and through their undersigned counsel, alleges as follows:			
19		NCE OF EXISTING COMPLAINT AND		
20	PHASE	1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the <i>James</i> Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1579 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Brian McKillop		
8				
9		$\Box \qquad \text{Priority Plaintiff}^{1}$		
10	4.	All Affected Property Addresses: 47389 East Lyons Mill City Drive, Lyons Oregon		
11		97358		
12				
13	5.	Current Mailing Address: Brian Mckillop		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name: Echo Mountain Complex		
18		X     Santiam Canyon		
19		South Obenchain		
20		242		
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22				
23 24				
24				
25				
20	age and/or f prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANE	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1579 - 2 OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 CHICAGO, IL (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:			
3	x     Bodily injuries			
4		X Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		X         Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15	Real property improvements (fences, roads, well, septic system, etc.)			
16	damaged			
17	X         Personal property damaged or destroyed			
18		Renter total loss		
19		Renter partial loss		
20		Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1579 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           0 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370		

1		x         Loss of personal property	
2		x Lost wages or impairment of earning capacity, and/or business profits of	
3		proceeds and/or any related displacement expenses	
4		Loss of timber, trees, crops, livestock, animals, or vegetation	
5		Lost business profits or proceeds	
6		X         Alternative living or displacement expenses	
7		x         Past and future medical expenses and incidental expenses	
8		x         Emotional distress including mental suffering, inconvenience, interference	
9		with normal and usual activities	
10		Loss of consortium	
11		x         Any other loss, expenses, costs, or damages	
12		xCosts	
13		x Pre- and post-judgment interest	
14		x         Double the amount of economic and property damages	
15		$\overline{x}$ Further relief as the Court deems equitable and just	
16	B.	Amount of Damages Sought	
17	9.	Plaintiff suffered economic damages in an amount not to exceed	
18		\$5,000,000.	
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed	
20		\$25,000,000.	
21	C.	Punitive Damages Sought x	
22	11.	0.25 times the amount of economic and noneconomic damages.	
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	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1579 - 4         DKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         OAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR	
	DODT: 1175		

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1579 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1580 - Nicholas Martin

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7 8		OF THE STATE OF OREGON Y OF MULTNOMAH		
9	Nicholas Martin,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander		
14	PACIFICORP, Defendants.	JURY TRIAL DEMANDED		
15 16				
17	The Plaintiff named below files this Shor	1 7		
18	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.		
19	Plaintiff, by and through their undersigned counsel, alleges as follows:			
20	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL			
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1580 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Nicholas Martin		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		89 North Echo Drive, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Nicholas Martin		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent to the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1580 - 2</b> LOKTING & SHIACHTER P.C. . OAK STREET 1201 THIRD AVENUE, SUITE 3200 5EATTLE, WA 98101 600 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7.	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3	X     Bodily injuries			
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13	Real property improvements (fences, roads, well, septic system, etc.)			
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged			
17	Personal property damaged or destroyed			
18	Renter total loss			
19		Renter partial loss		
20		Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1580 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           0 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370		

1	Loss of personal property			
2	Lost wages or impairment of earning capacity, and/or business profits of			
3	proceeds and/or any related displacement expenses			
4	4 Loss of timber, trees, crops, livestock, animals, or vegetation			
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		X Any other loss, expenses, costs, or damages		
12		xCosts		
13		x Pre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		$\underline{x}$ Further relief as the Court deems equitable and just		
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought x		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
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	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1580 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           350 N. LASALLE ST., 14TH FLOOR           V, OREGON 97204           SEATTLE, WA 98101           DI FAX (503) 227-6840           TEL. (206) 623-1900           FAX (206) 623-3384           TEL           TEL           CHICAGO, IL 60654		

TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1580 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1581 - Caitlin Rose Lyon

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7 8		F THE STATE OF OREGON OF MULTNOMAH		
9	Caitlin Rose Lyon,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander		
14 15	PACIFICORP, Defendants.	JURY TRIAL DEMANDED		
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	The Plaintiff named below files this Short Form Complaint and Jury Demand to determine Plaintiff's damages against Defendants by and through the undersigned counsel. Plaintiff, by and through their undersigned counsel, alleges as follows: I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL			
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the <i>James</i> Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this complaint, explicitly anticipates doing so as			
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1581 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Caitlin Rose Lyon	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		4745 Butte Falls Highway, Eagle Point Oregon 97524	
12			
13	5.	Current Mailing Address: Caitlin Rose Lyon	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		Echo Mountain Complex	
19		Santiam Canyon	
20		x     South Obenchain	
21		242	
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1581 - 2 .okTING & SHLACHTER P.C. .OAK STREET D, OREGON 97204 SEATTLE, WA 98101 SEATTLE, WA 98101 DO FAX (503) 227-6840 CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		Bodily injuries
4		X Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x     Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		x Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		X Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	DRM COMPLAINT #6 – COMPLAINT #1581 - 3           TING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           K STREET         1201 THIRD AVENUE, SUITE 3200           REGON 97204         SEATTLE, WA 98101           FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property		
2		Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses		
4		$\boxed{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation		
5		Lost business profits or proceeds		
6		X         Alternative living or displacement expenses		
7		x         Past and future medical expenses and incidental expenses		
8		x         Emotional distress including mental suffering, inconvenience, interference		
9		with normal and usual activities		
10		Loss of consortium		
11		x         Any other loss, expenses, costs, or damages		
12		xCosts		
13		xPre- and post-judgment interest		
14		x         Double the amount of economic and property damages		
15		$\overline{\mathbf{x}}$ Further relief as the Court deems equitable and just		
16	В.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Damages Sought X		
22	11.	0.25 times the amount of economic and noneconomic damages.		
23				
24				
25				
26				
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1581 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           TEL. (206) 623-1900         FAX (206) 623-3384		

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1581 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1582 - DeAnne Duedall

1		
2		
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6		
7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON
8		OF MULTNOMAH
9	DeAnne Duedall,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18 19	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:
20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1582 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		DeAnne Duedall		
8				
9		$\Box$ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		350 North Vista Terrace, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: DeAnne Duedall		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1582 - 2</b> LOKTING & SHIACHTER P.C. OAK STREET 1201 THIRD AVENUE, SUITE 3200 D, OREGON 97204 SEATTLE, WA 98101 SEATTLE, WA 98101 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		X Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X   Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1582 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL (206) 623-1300           TEL (206) 623-1900         FAX (206) 623-3384

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x Costs
13		xPre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE L 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1582 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1582 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1583 - Janice Lee Hohler

1 2 3 4 5		
6 7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	OF THE STATE OF OREGON OF MULTNOMAH
9 10	Janice Lee Hohler, Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
<ol> <li>11</li> <li>12</li> <li>13</li> </ol>	v. PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	PLAINTIFFS) Case Assigned to: Hon. Steffan Alexander
14 15	PACIFICORP, Defendants.	JURY TRIAL DEMANDED
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne I. INCORPORATION BY REFERE PHASE	s by and through the undersigned counsel. ed counsel, alleges as follows: NCE OF EXISTING COMPLAINT AND
21 22	1. Plaintiff expressly incorporates by <i>James, et al. v. PacifiCorp, et al</i> (No. 20CV3388	y reference the Fifth Amended Complaint in 35, filed April 17, 2023) (the "Master
<ul> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ul>	Complaint") into this Short Form Complaint as i action from the <i>James</i> Fifth Amended Complain reserves the right to amend all portions of this co discovery continues, and further reserves the right	t not adopted in Section IV below. Plaintiff omplaint, explicitly anticipates doing so as

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1583 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Janice Lee Hohler	
8			
9		$\Box$ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		115 North Corkhill Lane, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: Janice Lee Hohler	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:     x     Echo Mountain Complex	
18			
19		Santiam Canyon South Obenchain	
20		242	
21			
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAN	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent g the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1583 - 2</b> LOKTING & SHILACHTER P.C. , OAK STREET 1201 THIRD AVENUE, SUITE 3200 5EATTLE, WA 98101 600 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		X Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X         Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1583 - 3         EDELSON PC           DXTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           JOREGON 97204         SEATTLE, WA 98101           10         FAX (503) 227-6840           TEL. (206) 623-1900         FAX (206) 623-3384

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x         Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		xCosts
13		xPre- and post-judgment interest
14		X         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	В.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1583 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           TEL. (206) 623-1900         FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1583 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1584 - Sarah Lally

1		
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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON
8		OF MULTNOMAH
9	Sarah Lally,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander
13	electric utility and assumed business name of PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
15		
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
17	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:
19		NCE OF EXISTING COMPLAINT AND
20	PHASE	1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages
I		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1584 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	[236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set forth	n herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Sarah Lally	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		4869 Northeast 50th Street, Neotsu Oregon 97364	
12			
13	5.	Current Mailing Address: Sarah Lally	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x     Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21			
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W PORTLANI	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1584 - 2</b> OKTING & SHLACHTER P.C. OAK STREET D, OREGON 97204 00 FAX (503) 227-6840 KELLER ROHRBACK LL.P. EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER (206) 623-3384 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 FAX (206) 623-3384 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLER ROHRBACK LL.P. SEATTLE, WA 98101 KELLER (206) 623-1900 KELLER COMPCALINE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 KAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		X Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X         Damage to real property
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 – COMPLAINT #1584 - 3         EDELSON PC           DXTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           , OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10         FAX (503) 227-6840         TEL. (206) 623-3384         TEL. (312) 589-6370

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		$\boxed{X}$ Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		X Double the amount of economic and property damages
15		$\underline{X}$ Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
		FORM COMPLAINT #6 – COMPLAINT #1584 - 4 DKTING & SHLACHTER P.C. KELLER ROHRBACK L.L.P. EDELSON PC
	209 S.W. 0	DAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1584 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1585 - Ryan Felluca

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8	FOR THE COUNTY	F THE STATE OF OREGON OF MULTNOMAH		
9	Ryan Felluca,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY		
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:		
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL		
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages		

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Ryan Felluca		
8				
9		□ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		1879 North North Bank Road, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Ryan Felluca		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x   Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21		242		
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE 209 S.W PORTLAN	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent g the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1585 - 2 LOKTING & SHLACHTER P.C. . OAK STREET D, OREGON 97204 600 FAX (503) 227-6840 CHICAGO, IL 60654 TEL. (206) 623-1900 FAX (206) 623-3384 CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES	
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:	
3	x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		Primary residence total loss	
8		Primary residence partial loss	
9		Smoke and ash damage	
10		Secondary residence	
11		Other structures total loss	
12		Other structures partial loss	
13		xReal property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged		
17	X         Personal property damaged or destroyed		
18	x     Renter total loss		
19		Renter partial loss	
20		X Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1585 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           JO FAX (503) 227-6840         SEATTLE, WA 98101           TEL. (206) 623-1900         FAX (206) 623-3384	

1		x Loss o	f personal property	
2	2 Lost wages or impairment of earning capacity, and/or b			
3	3 proceeds and/or any related displacement expenses			
4		X Loss o	f timber, trees, crops, livestock, animals, or vegetation	
5		x Lost b	siness profits or proceeds	
6		X Alterna	tive living or displacement expenses	
7		X Past ar	d future medical expenses and incidental expenses	
8		x Emotio	nal distress including mental suffering, inconvenience, interference	
9		with no	ormal and usual activities	
10		Loss o	f consortium	
11		x Any ot	her loss, expenses, costs, or damages	
12		x Costs		
13		x Pre- ar	d post-judgment interest	
14		x Double	the amount of economic and property damages	
15		x Further	relief as the Court deems equitable and just	
16	B.	Amount of Damages Sought		
17	9.	Plaintiff suffered economic damages in an amount not to exceed		
18		\$5,000,000.		
19	10.	10. Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.		
21	C.	Punitive Dam	ages Sought X	
22	11.	0.25 times the	amount of economic and noneconomic damages.	
23				
24				
25				
26				
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	DRM COMPLA TING & SHLACHTER P. ( AK STREET IREGON 97204 FAX (503) 227-6840	NT #6 – COMPLAINT #1585 - 4 . KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (212) 589-6370 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378	

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1585 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1586 - Belinda L Boysun

1 2 3 4 5 6 7 8		PF THE STATE OF OREGON OF MULTNOMAH		
9	Belinda L Boysun,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY		
11	V.	PLAINTIFFS)		
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: Hon. Steffan Alexander		
14 15	Defendants.	JURY TRIAL DEMANDED		
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	The Plaintiff named below files this Short Form Complaint and Jury Demand to determine Plaintiff's damages against Defendants by and through the undersigned counsel. Plaintiff, by and through their undersigned counsel, alleges as follows: I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL			
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in		
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the James Fifth Amended Complaint not adopted in Section IV below. Plaintiff			
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as		
26	discovery continues, and further reserves the right	nt to increase the total amount of damages		

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1586 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set fort	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Belinda L Boysun		
8				
9		$\Box$ Priority Plaintiff <sup>1</sup>		
10	4.	All Affected Property Addresses:		
11		1128 North River Bend Road, Otis Oregon 97368		
12				
13	5.	Current Mailing Address: Belinda L Boysun		
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue		
15		Suite 1900 Portland, OR 97204		
16				
17	6.	Fire Name:		
18		x     Echo Mountain Complex		
19		Santiam Canyon		
20		South Obenchain		
21				
22				
23				
24				
25				
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1586 - 2 LOKTING & SHIACHTER P.C. COAK STREET 1201 THIRD AVENUE, SUITE 3200 500 FAX (503) 227-6840 TEL (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES		
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3		x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,		
5		interference with normal and usual activities.		
6		Loss of consortium		
7		Primary residence total loss		
8		Primary residence partial loss		
9		x         Smoke and ash damage		
10		Secondary residence		
11		Other structures total loss		
12		Other structures partial loss		
13		Real property improvements (fences, roads, well, septic system, etc.)		
14		destroyed		
15		Real property improvements (fences, roads, well, septic system, etc.)		
16		damaged		
17	X         Personal property damaged or destroyed			
18	Renter total loss			
19		Renter partial loss		
20		Damage to timber, trees, crops, livestock, animals, or vegetation		
21				
22		IV. DAMAGES		
23	8. Plaintiff alleges the following damages from the Master Complaint caused by			
24	Defendants:			
25	А.	Categories of Damages Sought		
26		X   Damage to real property		
	STOLL STOLL BERNE LC 209 S.W. 0 PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1586 - 3           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900		

1		x         Loss of personal property
2		x Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
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26		
	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1586 - 4         DKTING & SHLACHTER P.C.       KELLER ROHRBACK L.L.P.         DAK STREET       1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR
	DODT:	ODECON STOLES J., 14111 FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1586 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

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Short-Form Complaint #1587 - Daniel Hines

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7 8		F THE STATE OF OREGON OF MULTNOMAH		
9	Daniel Hines,			
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY		
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)		
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander		
13	electric utility and assumed business name of PACIFICORP,			
14	Defendants.	JURY TRIAL DEMANDED		
15				
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to		
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.			
18	Plaintiff, by and through their undersigned counsel, alleges as follows:			
19 20	I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND PHASE 1 TRIAL			
21	1. Plaintiff expressly incorporates by	v reference the Fifth Amended Complaint in		
22	1.       Plaintiff expressly incorporates by reference the Fifth Amended Complaint in         James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master			
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of			
24	action from the <i>James</i> Fifth Amended Complaint			
25	reserves the right to amend all portions of this co	•		
26	discovery continues, and further reserves the right			

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1587 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK LL.P.

 209 S.W. OAK STREET
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EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.			
2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if			
fully set forth herein.			
II. PLAINTIFF			
3. Plaintiff Name:			
Daniel Hines			
Priority Plaintiff <sup>1</sup>			
4. All Affected Property Addresses:			
257 North Fawn Drive, Otis Oregon 97368			
5. Current Mailing Address: Daniel Hines			
c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue			
Suite 1900 Portland, OR 97204			
6. Fire Name:			
x     Echo Mountain Complex			
Santiam Canyon			
South Obenchain			
<ul> <li><sup>1</sup> For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation.</li> <li>MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1587 - 2 STOLL STOLL BENNE LOKTING &amp; SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 SEATTLE, WA 98101 TEL. (503) 227-1600 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384</li> </ul>			

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		x         Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		x         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		x         Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		x         Damage to real property
	STOLL STOLL BERNE LC 209 S.W. O PORTLAND,	CORM COMPLAINT #6 - COMPLAINT #1587 - 3           WKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900

1		X	Loss of pers	sonal property	
2			Lost wages	or impairment of earning cap	acity, and/or business profits or
3			proceeds an	nd/or any related displacement	expenses
4		x	Loss of tim	ber, trees, crops, livestock, an	imals, or vegetation
5			Lost busine	ss profits or proceeds	
6		x	Alternative	living or displacement expense	ses
7		X	Past and fut	ture medical expenses and inc	idental expenses
8		X	Emotional of	distress including mental suffe	ering, inconvenience, interference
9			with norma	l and usual activities	
10			Loss of con	sortium	
11		X	Any other l	oss, expenses, costs, or damag	ges
12		x	Costs		
13		X	Pre- and po	st-judgment interest	
14		x	Double the	amount of economic and prop	perty damages
15		x	Further relie	ef as the Court deems equitabl	e and just
16	В.	Amou	int of Damag	ges Sought	
17	9.	Plainti	iff suffered e	conomic damages in an amou	nt not to exceed
18		\$5,000	0,000.		
19	10.	Plainti	iff suffered n	on-economic damages in an a	mount not to exceed
20		\$25,00	00,000.		
21	C.	Puniti	ive Damages	Sought x	
22	11.	0.25 ti	imes the amo	unt of economic and nonecon	omic damages.
23					
24					
25					
26					
	STOLL STOLL BERNE LC 209 S.W. C	OKTING & SH OAK STREET , OREGON 97	ILACHTER P.C.	<b>46 – COMPLAINT #1587 - 4</b> KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384	EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
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$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1587 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

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Short-Form Complaint #1588 - Stephen Hicks

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7 8		F THE STATE OF OREGON OF MULTNOMAH
9	Stephen Hicks,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander
13	PACIFICORP,	
14	Defendants.	JURY TRIAL DEMANDED
16 17 18	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne	s by and through the undersigned counsel.
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	5, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1588 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended				
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.				
3	2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if				
4	fully set forth herein.				
5	II. PLAINTIFF				
6	3. Plaintiff Name:				
7	Stephen Hicks				
8					
9	$\Box  Priority \ Plaintiff^{1}$				
10	4. All Affected Property Addresses:				
11	375 N. Vista Terrace, Otis, OR 97368; 376 N. Vista Terrace, Otis, OR 97368				
12	5. Current Mailing Address:				
13	Stephen Hicks c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue				
14	Suite 1900 Portland, OR 97204				
15					
16	Fire Name: 6.				
17	x     Echo Mountain Complex				
18	Santiam Canyon				
19 20	South Obenchain				
20	242				
22					
23					
24					
25					
26	$\frac{1}{1}$ For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of				
	age and/or for whom the health of the party is such that a preference is necessary to prevent prejudicing the party's interest in the litigation. <b>MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1588 - 2</b> STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840 TEL. (206) 623-1900 FAX (206) 623-3384 TEL. (312) 589-6370 FAX (312) 589-6378				

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		x     Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1588 - 3           KNTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           DAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           0 FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		X Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		x         Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		$\underline{x}$ Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
24		
25		
26		
	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1588 - 4         DKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST. 14TH FLOOP
	DODT: 11TE	CAR STREET 1201 HIRD A VENUE, SOLTE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1588 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1589 - Fallon Hoy

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7 8		OF THE STATE OF OREGON OF MULTNOMAH
9	Fallon Hoy,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY
11	V.	PLAINTIFFS)
12 13	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered electric utility and assumed business name of	Case Assigned to: Hon. Steffan Alexander
13	PACIFICORP,	
15	Defendants.	JURY TRIAL DEMANDED
16 17 18 19	The Plaintiff named below files this Shor determine Plaintiff's damages against Defendant Plaintiff, by and through their undersigne	s by and through the undersigned counsel.
20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	35, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1589 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended			
2	Complaint ¶	236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if		
4	fully set forth	h herein.		
5		II. PLAINTIFF		
6	3.	Plaintiff Name:		
7		Fallon Hoy		
8				
9		$\Box \qquad \text{Priority Plaintiff}^1$		
10	4.	All Affected Property Addresses:		
11		363 North Santiam Highway Apt. 2, Gates, Oregon 97346		
12				
13	5.	Current Mailing Address:		
14		Fallon Hoy c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC		
15		601 SW Second Avenue Suite 1900		
16		Portland, OR 97204		
17	6.	Eire Name:		
18		Echo Mountain Complex       x     Santiam Canyon		
19		South Obenchain		
20				
21				
22				
23				
24				
25				
26	age and/or i prejudicing MASS SHORT STOLL STOLL BERRE L 209 S.W. PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1589 - 2 .okTING & SHLACHTER P.C. .OAK STREET D, OREGON 97204 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 DO FAX (503) 227-6840 CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378		

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		x     Bodily injuries
4		x Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		x         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		Real property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	FORM COMPLAINT #6 - COMPLAINT #1589 - 3           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           OREGON 97204         SEATTLE, WA 98101           OF FAX (503) 227-6840         TEL. (206) 623-1900

1		x         Loss of personal property
2		Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		Loss of timber, trees, crops, livestock, animals, or vegetation
5		Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		X Past and future medical expenses and incidental expenses
8		X Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		x Costs
13		xPre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	В.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought X
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
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26		
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1589 - 4           OKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           O, OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           00 FAX (503) 227-6840         TEL. (206) 623-1900 FAX (206) 623-3384         TEL (312) 589-6370

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

# VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1589 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1590 - Kaeleen Holmgren

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7 8	IN THE CIRCUIT COURT O FOR THE COUNTY	
9	Kaeleen Holmgren,	
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY
11	v.	DEMAND (INDIVIDUAL AND ENTITY PLAINTIFFS)
12	PACIFICORP, an Oregon corporation; and	Case Assigned to: Hon. Steffan Alexander
13	PACIFIC POWER, an Oregon registered electric utility and assumed business name of PACIFICORP,	Case Assigned to: 11011. Steffan Alexander
14	Defendants.	JURY TRIAL DEMANDED
15 16		J
17	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to
18	determine Plaintiff's damages against Defendant	s by and through the undersigned counsel.
19	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:
20		NCE OF EXISTING COMPLAINT AND 1 TRIAL
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in
22	James, et al. v. PacifiCorp, et al (No. 20CV3388	25, filed April 17, 2023) (the "Master
23	Complaint") into this Short Form Complaint as i	f fully set forth herein except any causes of
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as
26	discovery continues, and further reserves the right	nt to increase the total amount of damages

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1590 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶	¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.	
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set fort	h herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Kaeleen Holmgren	
8			
9		$\Box$ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		438 North Yodel Lane, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: Kaeleen Holmgren	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x     Echo Mountain Complex	
19		Santiam Canyon	
20		South Obenchain	
21			
22			
23			
24			
25			
26	age and/or prejudicing MASS SHORT STOLL STOLL BERNE I 209 S.W PORTLAND	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. FORM COMPLAINT #6 – COMPLAINT #1590 - 2 LOKTING & SHIACHTER P.C. . OAK STREET 0.0AK STREET 0.0AK STREET 1201 THIRD AVENUE, SUITE 3200 500 FAX (503) 227-6840 TEL (206) 623-1900 FAX (206) 623-3384 TEL (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES
2	7.	Plaintiff alleges Defendants caused Plaintiff the following categories of injury:
3		X         Bodily injuries
4		X Emotional distress, including mental suffering, inconvenience,
5		interference with normal and usual activities.
6		Loss of consortium
7		Primary residence total loss
8		Primary residence partial loss
9		X         Smoke and ash damage
10		Secondary residence
11		Other structures total loss
12		Other structures partial loss
13		xReal property improvements (fences, roads, well, septic system, etc.)
14		destroyed
15		Real property improvements (fences, roads, well, septic system, etc.)
16		damaged
17		X         Personal property damaged or destroyed
18		Renter total loss
19		Renter partial loss
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation
21		
22		IV. DAMAGES
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by
24	Defendants:	
25	А.	Categories of Damages Sought
26		X         Damage to real property
	STOLL STOLL BERNE LC 209 S.W. PORTLAND	CORM COMPLAINT #6 - COMPLAINT #1590 - 3         EDELSON PC           IKTING & SHLACHTER P.C.         KELLER ROHRBACK LL.P.         EDELSON PC           DAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           O FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370

1		x         Loss of personal property
2		X Lost wages or impairment of earning capacity, and/or business profits or
3		proceeds and/or any related displacement expenses
4		X Loss of timber, trees, crops, livestock, animals, or vegetation
5		x         Lost business profits or proceeds
6		X         Alternative living or displacement expenses
7		x         Past and future medical expenses and incidental expenses
8		x         Emotional distress including mental suffering, inconvenience, interference
9		with normal and usual activities
10		Loss of consortium
11		X Any other loss, expenses, costs, or damages
12		xCosts
13		x Pre- and post-judgment interest
14		x         Double the amount of economic and property damages
15		x Further relief as the Court deems equitable and just
16	B.	Amount of Damages Sought
17	9.	Plaintiff suffered economic damages in an amount not to exceed
18		\$5,000,000.
19	10.	Plaintiff suffered non-economic damages in an amount not to exceed
20		\$25,000,000.
21	C.	Punitive Damages Sought x
22	11.	0.25 times the amount of economic and noneconomic damages.
23		
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	STOLL STOLL BERNE LO	FORM COMPLAINT #6 – COMPLAINT #1590 - 4 OKTING & SHLACHTER P.C. KELLER ROHRBACK L.L.P. EDELSON PC
	209 S.W.	OAK STREET 1201 THIRD AVENUE, SUITE 3200 350 N. LASALLE ST., 14TH FLOOR

PORTLAND, OREGON 97204 TEL. (503) 227-1600 FAX (503) 227-6840

SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384

## V. CAUSES OF ACTION ASSERTED

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

## VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1590 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

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 FAX (503) 227-6840

EDELSON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1591 - Gary Hohler

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7	IN THE CIRCUIT COURT O	F THE STATE OF OREGON	
8		OF MULTNOMAH	
9	Gary Hohler,		
10	Plaintiff,	SHORT FORM COMPLAINT AND JURY DEMAND (INDIVIDUAL AND ENTITY	
11	V.	PLAINTIFFS)	
12	PACIFICORP, an Oregon corporation; and PACIFIC POWER, an Oregon registered	Case Assigned to: Hon. Steffan Alexander	
13	electric utility and assumed business name of PACIFICORP,		
14	Defendants.	JURY TRIAL DEMANDED	
15			
16	The Plaintiff named below files this Shor	t Form Complaint and Jury Demand to	
17	determine Plaintiff's damages against Defendants by and through the undersigned counsel.		
18	Plaintiff, by and through their undersigne	ed counsel, alleges as follows:	
19 20		NCE OF EXISTING COMPLAINT AND 1 TRIAL	
21	1. Plaintiff expressly incorporates by	y reference the Fifth Amended Complaint in	
22	James, et al. v. PacifiCorp, et al (No. 20CV33885, filed April 17, 2023) (the "Master		
23	Complaint") into this Short Form Complaint as if fully set forth herein except any causes of		
24	action from the James Fifth Amended Complain	t not adopted in Section IV below. Plaintiff	
25	reserves the right to amend all portions of this co	omplaint, explicitly anticipates doing so as	
26	discovery continues, and further reserves the righ	nt to increase the total amount of damages	

 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1591 - 1

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
 KELLER ROHRBACK L.L.P.

 209 S.W. OAK STREET
 1201 THIRD AVENUE, SUITE 3200

 PORTLAND, OREGON 97204
 SEATTLE, WA 98101

 TEL. (503) 227-1600
 FAX (503) 227-6840

1	alleged and prayed for individually and/or on behalf of the class. See, e.g., Fifth Amended		
2	Complaint ¶¶ 236-37, 240, 242, 250, 252, 261, 263, 269, 271, 281; Prayer for Relief ¶¶ B., D.		
3	2.	Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if	
4	fully set forth	n herein.	
5		II. PLAINTIFF	
6	3.	Plaintiff Name:	
7		Gary Hohler	
8			
9		□ Priority Plaintiff <sup>1</sup>	
10	4.	All Affected Property Addresses:	
11		115 North Corkhill Lane, Otis Oregon 97368	
12			
13	5.	Current Mailing Address: Gary Hohler	
14		c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue	
15		Suite 1900 Portland, OR 97204	
16			
17	6.	Fire Name:	
18		x     Echo Mountain Complex	
19	Santiam Canyon		
20	South Obenchain		
21			
22			
23			
24			
25			
26	age and/or to prejudicing MASS SHORT STOLL STOLL BERNE L 209 S.W. PORTLANT	es of this short-form complaint, a priority plaintiff is a party who is over 70 years of for whom the health of the party is such that a preference is necessary to prevent the party's interest in the litigation. <b>FORM COMPLAINT #6 – COMPLAINT #1591 - 2</b> OKTING & SHLACHTER P.C. OAK STREET 0, OREGON 97204 00 FAX (503) 227-6840 KELLER ROHRBACK LL.P. COAK STREET 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623-1900 FAX (206) 623-3384 KELLER ROHRBACK LL.P. CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378	

1		III. CATEGORIES OF INJURIES	
2	7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:		
3	x     Bodily injuries		
4		x Emotional distress, including mental suffering, inconvenience,	
5		interference with normal and usual activities.	
6		Loss of consortium	
7		Primary residence total loss	
8		Primary residence partial loss	
9		x         Smoke and ash damage	
10		Secondary residence	
11		Other structures total loss	
12		Other structures partial loss	
13		Real property improvements (fences, roads, well, septic system, etc.)	
14		destroyed	
15	Real property improvements (fences, roads, well, septic system, etc.)		
16	damaged		
17	X         Personal property damaged or destroyed		
18	Renter total loss		
19		Renter partial loss	
20		X         Damage to timber, trees, crops, livestock, animals, or vegetation	
21			
22		IV. DAMAGES	
23	8.	Plaintiff alleges the following damages from the Master Complaint caused by	
24	Defendants:		
25	А.	Categories of Damages Sought	
26		X         Damage to real property	
	STOLL STOLL BERNE LC 209 S.W. C PORTLAND,	FORM COMPLAINT #6 - COMPLAINT #1591 - 3         EDELSON PC           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.         EDELSON PC           OAK STREET         1201 THIRD AVENUE, SUITE 3200         350 N. LASALLE ST., 14TH FLOOR           , OREGON 97204         SEATTLE, WA 98101         CHICAGO, IL 60654           10 FAX (503) 227-6840         TEL. (206) 623-1900         FAX (206) 623-3384         TEL. (312) 589-6370	

1	x         Loss of personal property		
2	Lost wages or impairment of earning capacity, and/or business profits or		
3		proceeds and/or any related displacement expenses	
4		X Loss of timber, trees, crops, livestock, animals, or vegetation	
5		Lost business profits or proceeds	
6		X         Alternative living or displacement expenses	
7		X Past and future medical expenses and incidental expenses	
8		x         Emotional distress including mental suffering, inconvenience, interference	
9		with normal and usual activities	
10		Loss of consortium	
11		x         Any other loss, expenses, costs, or damages	
12		xCosts	
13		x Pre- and post-judgment interest	
14		x         Double the amount of economic and property damages	
15	x Further relief as the Court deems equitable and just		
16	B. Amount of Damages Sought		
17	9. Plaintiff suffered economic damages in an amount not to exceed		
18	\$5,000,000.		
19	10. Plaintiff suffered non-economic damages in an amount not to exceed		
20		\$25,000,000.	
21	C. Punitive Damages Sought X		
22	11. 0.25 times the amount of economic and noneconomic damages.		
23			
24			
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26			
	STOLL STOLL BERNE LO 209 S.W. PORTLAND	FORM COMPLAINT #6 – COMPLAINT #1591 - 4           DKTING & SHLACHTER P.C.         KELLER ROHRBACK L.L.P.           OAK STREET         1201 THIRD AVENUE, SUITE 3200           , OREGON 97204         SEATTLE, WA 98101           0F FAX (503) 227-6840         TEL. (206) 623-1900           FAX (503) 227-6840         TEL. (206) 623-1900	

## V. CAUSES OF ACTION ASSERTED

12. The following Causes of Action asserted in the Master Complaint and the

allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
$\boxtimes$	1	Negligence
$\boxtimes$	2	Gross Negligence
$\boxtimes$	3	Private Nuisance
$\boxtimes$	4	Public Nuisance
$\boxtimes$	5	Trespass
$\boxtimes$	6	Injunction

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all other relief as the Court deems proper, equitable, and just, and as set forth in the Master Complaint.

## VI. JURY DEMAND

Plaintiff hereby demands a trial by jury.

 MASS SHORT FORM COMPLAINT #6 - COMPLAINT #1591 - 5

 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
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1	RESPECTFULLY SUBMITTED this 14th day of January, 2025.			
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4		Marilyn Heike Attorney for P	en, ØSB #923 <b>\$</b> 08 Ilaj tiffs	
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6 7		Eugene, OR 97401 Telephone: (541) 4 Email: mheiken@j		
8		-AND-		
9		EDELSON PC		
10		By: <u>s/</u>	· · · · · · · · · · · · · · · · · · ·	
11		Attorney for P	nia, <i>pro hac vice</i> laintiffs	
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	SIGNATURE PAGES - 3 (20cv33885) STOLL STOLL BERNE LOKTING & SHLACHTER P.C. 209 S.W. OAK STREET PORTLAND, OREGON 97204 TEL. (503) 227 1600 FAX (503) 227 6840	KELLER ROHRBACK L.L.P. 1201 THIRD AVENUE, SUITE 3200 SEATTLE, WA 98101 TEL. (206) 623 1900 FAX (206) 623 3384	FDEI SON PC 350 N. LASALLE ST., 14TH FLOOR CHICAGO, II. 60654 TEL. (312) 589-6370 FAX (312) 589-6378

1	CERTIFICATE OF SERVICE			
2	I hereby certify that I caus	ed to be served a corr	ect copy of the foregoing MASS SHORT	
3	FORM COMPLAINT #6 on the	following named per	son(s) on the date and manner indicated	
4	below, addressed to said persons	at the address of each	shown below per UTCR 21.100 as	
5	follows:			
6	Alison Plessman,		By Hand Delivery	
7	Stephanie W. Xiao, Khoa D. Nguyen,		By Overnight Delivery By Fax Pursuant to ORCP 9 F	
8	Rajan S. Trehan, Christopher Galeano,	$\boxtimes$	By U.S. Mail with postage prepaid By E-Mail Pursuant to ORCP 9 G	
9	Tyler Dang HUESTON HENNIGAN LLP		If registered, electronically by OJD E- & Serve at the party's email address as	
10	523 West 6th St., Suite 400 Los Angeles, California, CA 900 aplessman@hueston.com,		ded on the date of service in the eFiling m pursuant to UTCR 21.100	
11	sxiao@hueston.com, knguyen@hueston.com,			
12	rtrehan@hueston.com, cgaleano@hueston.com,			
13	tdang@hueston.com, PacifiCorp correspondence@hu	eston.com		
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15	Douglas J. Dixon		By Hand Delivery	
16 17	Craig A. Fligor Thomas King		By Overnight Delivery By Fax Pursuant to ORCP 9 F	
17	Michael Schneider HUESTON HENNIGAN LLP	X	By U.S. Mail with postage prepaid By E-Mail Pursuant to ORCP 9 G	
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21	tking@hueston.com mschneider@hueston.com			
22	Attorneys for Defendants			
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4	James Kilcup Kaitlyn Lindaman		By E-Mail Pursuant to ORCP 9 G If registered, electronically by OJD E-
	Katherine Shepherd	File & S	Serve at the party's email address as
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18	Joshua E. Dubin, Esq. P.A. 201 S. Biscayne Blvd., Suite 1300		By Overnight Delivery By Fax Pursuant to ORCP 9 F
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	jdubin@dubinconsulting.com		If registered, electronically by OJD E-
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21		system	pursuant to UTCR 21.100
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<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	Attorneys for Plaintiff Dietrich, Salter and Allen Gerald Singleton, OSB #210955 Susan B. Dussault, OSB #021125 Singleton Schreiber LLP 591 Camino de la Reina, Suite 1025 San Diego, CA 92101 Tel: (619) 771-3473 gsingleton@singletonschreiber.com sdussault@singletonschreiber.com Attorneys for Cady and Logan Plaintiffs	By Hand Delivery By Overnight Delivery By Facsimile Pursuant to ORCP 9 F By U.S. Mail with postage prepaid By E-Mail Pursuant to ORCP 9 G If registered, electronically by OJD E- File & Serve at the party's email address as recorded on the date of service in the eFiling system pursuant to UTCR 21.100
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9							
10	Wm. Keith Dozier Wm. Keith Dozier, LLC		By By	Hand Delivery Overnight Delivery			
11	385 1st Street, Suite 217 Lake Oswego, OR 9703		By By	Facsimile Pursuant to ORCP 9 F U.S. Mail with postage prepaid			
12	Telephone: (503) 594-0333 Facsimile: (503) 697-0841			E-Mail Pursuant to ORCP 9 G egistered, electronically by OJD E-			
13	Email: keith@wkd-law.com	~ ~ ~ ~ .	recorded o	ve at the party's email address as n the date of service in the eFiling			
14	Attorneys for Plaintiffs Michael Dillingham, Gregory J. Denton	and Gregory	system pu	rsuant to UTCR 21.100			
15	J. Denton in his capacity as True Denton Living Trust, Fawn Wea	ker, DDD's					
16	LLC, Judith Coates, Misti Room Ross, Michael Sims, and Wayne						
17	Dated this 14th day of January, 2	025					
18	Duce this I fill duy of building, 2		IOIDIG				
19				ON JOHNSON LUCAS DLETON, PC			
20			Marilyn	<u>Marilyn Heiken</u> Heiken, OSB #923308			
21			Eugene	c Street, Suite 1050 , OR 97401			
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23	Attorney for Plaintiffs						
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CHICAGO, IL 60654 TEL. (312) 589-6370 FAX (312) 589-6378