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5 IN THE CIRCUIT COURT OF THE STATE OF OREGON
6 FOR THE COUNTY OF MULTNOMAH

7 Butte Falls Family Ranch, LLC, JJ Farms
8 LLC, Adrienne Arntt, Emmitt Bateman,
9 Nicholas Burns, Jessica Ann Childress,
10 James Young, Kristi Clark, David DeLain,
11 Amanda Thompson, William Browning,
12 David Sheridan, Patrick Galasso, Sharon
13 Galasso, Jeffrey Hall, William Edward
14 Klagge, Loriann Sheridan, Mark Hamrick,
15 Ian McPhee, Tim Miller, Tanya Mullen,
16 Daniel Ohrt, Megan Shaw, Gina
17 Browning, Mark Schachtsick, Logan
18 Johnson, Vitalia Robins, K&K Quality
19 Construction LLC, Michael Adee, Darla
20 Schachtsick, Milo Fletcher, Erin Bodily,
21 John Bodily, Joseph Bones, Nancy Chase,
22 Winter Brunelle, Emilee Robins, Kevin
23 Callaghan, Cherie Robertson-Girod, John
24 Bock, Juan Collier, Gabriel David Voth,
25 Brian McKillop, Nicholas Martin, Caitlin
26 Rose Lyon, DeAnne Duedall, Janice Lee
Hohler, Sarah Lally, Ryan Felluca,
Belinda L Boysun, Daniel Hines, Stephen
Hicks, Fallon Hoy, Kaeleen Holmgren,
Gary Hohler,

Plaintiffs,

v.

PACIFICORP, an Oregon corporation;
and PACIFIC POWER, an Oregon
registered electric utility and assumed
business name of PACIFICORP,

Defendants.

Case No. 20CV33885 (Lead Case) ✓

Case Assigned to: Hon. Steffan Alexander

Related Cases:

<i>Allen</i>	20CV37430
<i>Salter</i>	21CV33595
<i>AIG (21st Century)</i>	22CV26326
<i>Allstate</i>	22CV29976
<i>Freres Timber</i>	22CV29694
<i>Bell</i>	22CV30450
<i>Dietrich</i>	22CV29187
<i>Cady</i>	22CV13946
<i>Logan</i>	22CV29859
<i>C.W. Specialty Lumber</i>	22CV41640

MASS SHORT FORM COMPLAINT #6

JURY TRIALS DEMANDED

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

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
209 S.W. OAK STREET
PORTLAND, OREGON 97204
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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 Pursuant to CMO 8, each above-captioned plaintiff hereby files their short-form
2 complaint and demands a jury trial on all claims so triable. To reduce administrative burden on
3 the Court and the Clerk's office, each plaintiff's allegations, as presented below, have been
4 separated into differently numbered short-form complaints divided by slip pages.
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MASS SHORT FORM COMPLAINT #6 - ii
(20cv33885)

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Short-Form Complaint #1537 - Butte Falls Family Ranch, LLC

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Butte Falls Family Ranch, LLC,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1537 - 1

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:
7 Butte Falls Family Ranch, LLC

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:
11 5422 Butte Falls Highway, Eagle Point Oregon 97524

12
13 5. Current Mailing Address:
14 Butte Falls Family Ranch, LLC
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242
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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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.

C. Punitive Damages Sought

11. 0.25 times the amount of economic and noneconomic damages.

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$5,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1538 - JJ Farms LLC

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

JJ Farms LLC,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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
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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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:
7 JJ Farms LLC

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:
11 5422 Butte Falls Highway, Eagle Point Oregon 97524

12
13 5. Current Mailing Address:
14 JJ Farms LLC
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW
16 Second Avenue Suite 1900
17 Portland, OR 97204

18 6. Fire Name:

19 Echo Mountain Complex

20 Santiam Canyon

21 South Obenchain

22 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1538 - 2

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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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
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- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.

C. Punitive Damages Sought

11. 0.25 times the amount of economic and noneconomic damages.

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
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<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$5,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1539 - Adrienne Arntt

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Adrienne Arntt,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Adrienne Arntt

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 424 North Yodel Lane, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Adrienne Arntt
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1539 - 2

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1 **III. CATEGORIES OF INJURIES**

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- 7 Primary residence total loss
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- 10 Secondary residence
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of personal property
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- Past and future medical expenses and incidental expenses
- Emotional distress including mental suffering, inconvenience, interference with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
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<input checked="" type="checkbox"/>	3	Private Nuisance
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<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1540 - Emmitt Bateman

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Emmitt Bateman,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1540 - 1

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3 2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if
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5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Emmitt Bateman

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 2963 Butte Falls Highway, Eagle Point Oregon 97524

11 5. Current Mailing Address:

12 Emmitt Bateman
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1541 - Nicholas Burns

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Nicholas Burns,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Nicholas Burns

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 393 North Best View Drive, Otis Oregon 97368

11 5. Current Mailing Address:

12 Nicholas Burns
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1542 - Jessica Ann Childress

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Jessica Ann Childress,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 144 North Westview Circle, Otis Oregon 97368
12 991 Forest Rd, Otis, OR 97368

13 5. Current Mailing Address:

14 Jessica Ann Childress
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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25
26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1542 - 2

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PORTLAND, OREGON 97204
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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1543 - James Young

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

James Young,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 701 West Central Street, Gates Oregon 97346

11 5. Current Mailing Address:

12 James Young
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1543 - 2

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

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SEATTLE, WA 98101
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EDELSON PC
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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

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Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1544 - Kristi Clark

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Kristi Clark,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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Plaintiff, by and through their undersigned counsel, alleges as follows:

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action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Kristi Clark

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 260 North Pony Trail Lane, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Kristi Clark
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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25
26 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.

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
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- 10 Secondary residence
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- 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1545 - David DeLain

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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

5 DAVID DELAIN,

6 Plaintiff,

7 v.

8 PACIFICORP, an Oregon corporation; and
9 PACIFIC POWER, an Oregon registered
10 electric utility and assumed business name of
PACIFICORP,

11 Defendants.

Case No. 20CV33885 (Lead Case)

Case Assigned to: Hon. Steffan Alexander

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

JURY TRIAL DEMANDED

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 **I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND**
16 **PHASE 1 TRIAL**

17 25. Plaintiff expressly incorporates by reference the Fifth Amended Complaint in
18 *James, et al. v. PacifiCorp, et al* (No. 20CV33885, filed April 17, 2023) (the "Master
19 Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
20 action from the *James* 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, 263, 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 – COMPLAINT #1545 - 1

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

1 **II. PLAINTIFF**

2 27. Plaintiff Name:

3 David DeLain

4 Priority Plaintiff³

5 28. All Affected Property Addresses:

6 2368 Salmon River Hwy #6, Otis, Oregon 97368

7 29. Current Mailing Address:

8 David DeLain
9 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
10 601 SW Second Avenue
11 Suite 1900
12 Portland, OR 97204

13 30. Fire Name:

14 Echo Mountain Complex

15 Santiam Canyon

16 South Obenchain

17 242

18 **III. CATEGORIES OF INJURIES**

19 31. Plaintiff allege(s) Defendants caused them the following categories of injury:

20 Bodily injuries

21 Emotional distress, including mental suffering, inconvenience,
22 interference with normal and usual activities.

23 Loss of consortium

24 Primary residence total loss

25 Primary residence partial loss

26 Smoke and ash damage

Secondary residence

³ 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.

- 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 Damage to timber, trees, crops, livestock, animals, or vegetation

IV. DAMAGES

32. Plaintiff allege(s) the following damages from the Master Complaint caused by

Defendants:

A. Categories of Damages Sought

- 15 Damage to real property
- 16 Loss of personal property
- 17 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 Emotional distress including mental suffering, inconvenience, interference
- 24 with normal and usual activities
- 25 Loss of consortium
- 26 Any other loss, expenses, costs, or damages
- Costs

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1545 - 3

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

- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 33. Plaintiff suffered economic damages in an amount not to exceed \$1 million.
- 34. Plaintiff suffered non-economic damages in an amount not to exceed \$25 million.

C. Punitive Damages Sought

- 35. 0.25 times the amount of economic and noneconomic damages.

V. CAUSES OF ACTION ASSERTED

- 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

Short From Complaint

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

WHEREFORE, Plaintiff pray(s) for relief and judgment against Defendants for \$26,000,000 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 #1545 - 4

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

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 SEATTLE, WA 98101
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 CHICAGO, IL 60654
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Short-Form Complaint #1546 - Amanda Thompson

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Amanda Thompson,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Amanda Thompson

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 293 N Westview Dr., Otis Oregon 97368

11 5. Current Mailing Address:

12 Amanda Thompson
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1547 - William Browning

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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 WILLIAM BROWNING,

7 Plaintiff,

8 v.

9 PACIFICORP, an Oregon corporation; and
10 PACIFIC POWER, an Oregon registered
11 electric utility and assumed business name of
12 PACIFICORP,

13 Defendants.

Case No. 20CV33885 (Lead Case)

SHORT FORM COMPLAINT AND JURY
DEMAND (WILLIAM BROWNING)

Case Assigned to: Hon. Steffan Alexander

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 1 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 Complaint not adopted in Section IV below. Plaintiff(s)
23 reserve their right to amend and increase the total amount of damages alleged and prayed for on
24 behalf of the class. *See, e.g.*, Fifth Amended Complaint ¶¶ 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 jury verdicts from Phase 1,
as if fully set forth herein.

41 MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1547

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

1 **II. PLAINTIFF(S)**

2 15. Plaintiff(s) Names:

3 William Browning

4 Priority Plaintiff²

5 16. All Affected Property Addresses:

6 4131 NE Neotsu Drive, Neotsu, OR 97364

7 17. Current Mailing Address:

8 William Browning
9 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
10 601 SW Second Avenue
11 Suite 1900
12 Portland, OR 97204

13 18. Fire Name:

14 Echo Mountain Complex

15 Santiam Canyon

16 South Obenchain

17 242

18 **III. CATEGORIES OF INJURIES**

19 19. Plaintiff(s) allege(s) Defendants caused them the following categories of injury:

20 Bodily injuries

21 Emotional distress, including mental suffering, inconvenience,
22 interference with normal and usual activities.

23 Loss of consortium

24 Primary residence total loss

25 Primary residence partial loss

26 Smoke and ash damage

Secondary residence

² 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.

- 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 Damage to timber, trees, crops, livestock, animals, or vegetation

IV. DAMAGES

20. Plaintiff(s) allege(s) the following damages from the Master Complaint caused by

Defendants:

A. Categories of Damages Sought

- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages

- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 21. Plaintiff(s) suffered economic damages in an amount not to exceed \$5 million.
- 22. Plaintiff(s) suffered non-economic damages in an amount not to exceed \$25 million.

C. Punitive Damages Sought

- 23. 0.25 times the amount of economic and noneconomic damages.

V. CAUSES OF ACTION ASSERTED

- 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

Short Form Complaint:

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants for \$30 million 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1547

STOLL STOLL BERNE LOKING & 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

VI. JURY DEMAND

Plaintiff(s) hereby demands a trial by jury.

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1547

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
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SEATTLE, WA 98101
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TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1548 - David Sheridann

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

David Sheridann,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 David Sheridann

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 447 North Fawn Drive, Otis Oregon 97368

11 5. Current Mailing Address:

12 David Sheridann
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
- 26

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1549 - Patrick Galasso

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Patrick Galasso,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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.
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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 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 Patrick Galasso

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 7595 NE Viewcrest Court, Otis Oregon 97368

11 5. Current Mailing Address:

12 Patrick Galasso
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1549 - 2

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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 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
- 26

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

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Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
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<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1550 - Sharon Galasso

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Sharon Galasso,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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determine Plaintiff's damages against Defendants by and through the undersigned counsel.

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**I. INCORPORATION BY REFERENCE OF EXISTING COMPLAINT AND
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1. Plaintiff expressly incorporates by reference the Fifth Amended Complaint in
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Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1550 - 1

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209 S.W. OAK STREET
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Sharon Galasso

8
9 Priority Plaintiff¹

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
14 5. Current Mailing Address:

15 Sharon Galasso

16 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC

17 601 SW Second Avenue

18 Suite 1900

19 Portland, OR 97204

20 6. Fire Name:

21 Echo Mountain Complex

22 Santiam Canyon

23 South Obenchain

24 242

25
26 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.

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 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
- 26

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1551 - Jeffrey Hall

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Jeffrey Hall,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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:

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Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Jeffrey Hall

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 264 North Westview Drive, Otis Oregon 97368

11 5. Current Mailing Address:

12 Jeffrey Hall
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1551 - 2

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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

- 3 Bodily injuries
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- 5 interference with normal and usual activities.
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- 7 Primary residence total loss
- 8 Primary residence partial loss
- 9 Smoke and ash damage
- 10 Secondary residence
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of personal property
- Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses
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- Past and future medical expenses and incidental expenses
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- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1552 - William Edward Klagge

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

William Edward Klagge,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

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

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1 alleged and prayed for individually and/or on behalf of the class. *See, e.g.*, Fifth Amended
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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 William Edward Klagge

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 364 Northeast 4th Avenue, Mill City Oregon 97360

11 5. Current Mailing Address:

12 William Edward Klagge
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1552 - 2

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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of personal property
- Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses
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- Double the amount of economic and property damages
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- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1552 - 4

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
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Check if Applicable	Cause of Action Number	Cause of Action
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<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1553 - Loriann Sheridan

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Loriann Sheridan,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Loriann Sheridan

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 447 North Fawn Drive, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Loriann Sheridan
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
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<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1554 - Mark Hamrick

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Mark Hamrick,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Mark Hamrick

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 310 N Best View Dr, Otis Oregon 97368-9710

11 5. Current Mailing Address:

12 Mark Hamrick
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1555 - Ian McPhee

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Ian McPhee,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
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action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Ian McPhee

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 2963 Butte Falls Highway, Eagle Point Oregon 97524

11 5. Current Mailing Address:

12 Ian McPhee
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1555 - 2

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

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SEATTLE, WA 98101
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EDELSON PC
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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1556 - Tim Miller

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Tim Miller,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

The Plaintiff named below files this Short Form Complaint and Jury Demand to
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Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Tim Miller

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 22865 Jennie Road, Lyons Oregon 97358

11 5. Current Mailing Address:

12 Tim Miller
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1556 - 2

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209 S.W. OAK STREET
PORTLAND, OREGON 97204
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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 Smoke and ash damage
- 10 Secondary residence
- 11 Other structures total loss
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- 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
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- 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
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- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

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Check if Applicable	Cause of Action Number	Cause of Action
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<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
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15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1557 - Tanya Mullen

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Tanya Mullen,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Tanya Mullen

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 5422 Butte Falls Highway, Eagle Point Oregon 97524

11 5. Current Mailing Address:

12 Tanya Mullen
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1558 - Daniel Ohrt

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Daniel Ohrt,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
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PORTLAND, OREGON 97204
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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 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 Daniel Ohrt

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 100 West Central Street, Gates Oregon 97346

11 5. Current Mailing Address:

12 Daniel Ohrt
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1559 - Megan Shaw

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Megan Shaw,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Megan Shaw

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 1128 North River Bend Road, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Megan Shaw
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1559 - 2

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.
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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1560 - Gina Browning

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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 GINA BROWNING,

7 Plaintiff,

8 v.

9 PACIFICORP, an Oregon corporation; and
10 PACIFIC POWER, an Oregon registered
11 electric utility and assumed business name of
12 PACIFICORP,

13 Defendants.

Case No. 20CV33885 (Lead Case)

Case Assigned to: Hon. Steffan Alexander

SHORT FORM COMPLAINT AND JURY
DEMAND (GINA BROWNING)

JURY TRIAL DEMANDED

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 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 Complaint not adopted in Section IV below. Plaintiff(s)
23 reserve their right to amend and increase the total amount of damages alleged and prayed for on
24 behalf of the class. *See, e.g.*, Fifth Amended Complaint ¶¶ 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 – COMPLAINT #1560

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

1 **II. PLAINTIFF(S)**

2 3. Plaintiff(s) Names:

3 Gina Browning

4 Priority Plaintiff¹

5 4. All Affected Property Addresses:

6 4131 NE Neotsu Drive, Neotsu, OR 97364

7 5. Current Mailing Address:

8 Gina Browning
9 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
10 601 SW Second Avenue
11 Suite 1900
12 Portland, OR 97204

13 6. Fire Name:

14 Echo Mountain Complex

15 Santiam Canyon

16 South Obenchain

17 242

18 **III. CATEGORIES OF INJURIES**

19 7. Plaintiff(s) allege(s) Defendants caused them the following categories of injury:

20 Bodily injuries

21 Emotional distress, including mental suffering, inconvenience,
22 interference with normal and usual activities.

23 Loss of consortium

24 Primary residence total loss

25 Primary residence partial loss

26 Smoke and ash damage

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.

- 1 Secondary residence
- 2 Other structures total loss
- 3 Other structures partial loss
- 4 Real property improvements (fences, roads, well, septic system, etc.)
- 5 destroyed
- 6 Real property improvements (fences, roads, well, septic system, 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

IV. DAMAGES

14 8. Plaintiff(s) allege(s) the following damages from the Master Complaint caused by
 15 Defendants:

16 **A. Categories of Damages Sought**

- 17 Damage to real property
- 18 Loss of personal property
- 19 Lost wages or impairment of earning capacity, and/or business profits or
- 20 proceeds and/or any related displacement expenses
- 21 Loss of timber, trees, crops, livestock, animals, or vegetation
- 22 Lost business profits or proceeds
- 23 Alternative living or displacement expenses
- 24 Past and future medical expenses and incidental expenses
- 25 Emotional distress including mental suffering, inconvenience, interference
- 26 with normal and usual activities
- Loss of consortium

- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff(s) suffered economic damages in an amount not to exceed \$5 million.
- 10. Plaintiff(s) suffered non-economic damages in an amount not to exceed \$25 million.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

WHEREFORE, Plaintiff(s) pray(s) 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.

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1560

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
209 S.W. OAK STREET
PORTLAND, OREGON 97204
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EDELSON PC
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TEL. (312) 589-6370 FAX (312) 589-6378

Short-Form Complaint #1561 - Mark Schachtsick

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Mark Schachtsick,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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209 S.W. OAK STREET
PORTLAND, OREGON 97204
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KELLER ROHRBACK L.L.P.
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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

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 Mark Schachtsick

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 51029 Greenway Drive, Gates Oregon 97346

11 5. Current Mailing Address:

12 Mark Schachtsick
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1561 - 2

STOLL STOLL BERNE LOKING & 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

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1562 - Logan Johnson

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Logan Johnson,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Plaintiff¹

10 4. All Affected Property Addresses:
11 296 North Deer Valley Road, Otis Oregon 97368

12
13 5. Current Mailing Address:
14 Logan Johnson
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242
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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.

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 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

22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1562 - 4

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
209 S.W. OAK STREET
PORTLAND, OREGON 97204
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SEATTLE, WA 98101
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CHICAGO, IL 60654
TEL. (312) 589-6370 FAX (312) 589-6378

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1563 - Vitalia Robins

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Vitalia Robins,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Vitalia Robins

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:
11 24368 Taylor Park Road SE, Lyons Oregon 97358

12
13 5. Current Mailing Address:
14 Vitalia Robins
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242
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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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1564 - K&K Quality Construction LLC

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

K&K Quality Construction LLC,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1564 - 1

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

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 K&K Quality Construction LLC

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:
11 438 North Yodel Lane, Otis Oregon 97368

12
13 5. Current Mailing Address:
14 Kaeleen Holmgren
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:
20 Echo Mountain Complex
21 Santiam Canyon
22 South Obenchain
23 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1564 - 2

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

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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

9. Plaintiff suffered economic damages in an amount not to exceed \$500,000.

C. Punitive Damages Sought

11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

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Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$500,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1565 - Michael Adee

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Michael Adee,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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:

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reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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CHICAGO, IL 60654
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Michael Adee

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 119 East Sorbin Street, Gates Oregon 97346

11 5. Current Mailing Address:

12 Michael Adee
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1566 - Darla Schachtsick

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Darla Schachtsick,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Darla Schachtsick

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 51029 Greenway Drive, Gates Oregon 97346

12
13 5. Current Mailing Address:

14 Darla Schachtsick
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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25
26 ¹ For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of
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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

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- 6 Loss of consortium
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1567 - Milo Fletcher

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Milo Fletcher,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

1. Plaintiff expressly incorporates by reference the Fifth Amended Complaint in
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Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Milo Fletcher

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 994 North Glenview Loop, Otis Oregon 97368

11 5. Current Mailing Address:

12 Milo Fletcher

13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC

14 601 SW Second Avenue

15 Suite 1900

16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1567 - 2

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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 Smoke and ash damage
- 10 Secondary residence
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of personal property
- Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses
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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1567 - 4

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
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TEL. (312) 589-6370 FAX (312) 589-6378

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1568 - Erin Bodily

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Erin Bodily,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

KELLER ROHRBACK L.L.P.
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SEATTLE, WA 98101
TEL. (206) 623-1900 FAX (206) 623-3384

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Erin Bodily

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 40216 North Dogwood Road, Mill City Oregon 97360

12
13 5. Current Mailing Address:

14 Erin Bodily
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

24
25
26 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
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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1568 - 2

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PORTLAND, OREGON 97204
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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

- 3 Bodily injuries
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- 19 Renter partial loss
- 20 Damage to timber, trees, crops, livestock, animals, or vegetation

21 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
- 26

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B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
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15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1569 - John Bodily

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

John Bodily,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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

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
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TEL. (206) 623-1900 FAX (206) 623-3384

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 John Bodily

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 40216 North Dogwood Road, Mill City Oregon 97360

11 5. Current Mailing Address:

12 John Bodily
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1569 - 2

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

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1570 - Joseph Bones

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Joseph Bones,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Joseph Bones

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 457 North Pleasure Drive, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Joseph Bones
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1570 - 2

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
209 S.W. OAK STREET
PORTLAND, OREGON 97204
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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1571 - Nancy Chase

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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 Nancy Chase,

7 Plaintiff,

8 v.

9 PACIFICORP, an Oregon corporation; and
10 PACIFIC POWER, an Oregon registered
11 electric utility and assumed business name of
12 PACIFICORP,

13 Defendants.

Case No. 20CV33885 (Lead Case)

Case Assigned to: Hon. Steffan Alexander

SHORT FORM COMPLAINT AND JURY
DEMAND (GINA BROWNING)

JURY TRIAL DEMANDED

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 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 Complaint not adopted in Section IV below. Plaintiff(s)
23 reserve their right to amend and increase the total amount of damages alleged and prayed for on
24 behalf of the class. *See, e.g.*, Fifth Amended Complaint ¶¶ 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 – COMPLAINT #1571 1

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

1 **II. PLAINTIFF(S)**

2 3. Plaintiff(s) Names:

3 Nancy Chase

4 Priority Plaintiff¹

5 4. All Affected Property Addresses:

6 2034 Salmon River Highway, Otis, OR 97368

7 5. Current Mailing Address:

8 Nancy Chase
9 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
10 601 SW Second Avenue
11 Suite 1900
12 Portland, OR 97204

13 6. Fire Name:

14 Echo Mountain Complex

15 Santiam Canyon

16 South Obenchain

17 242

18 **III. CATEGORIES OF INJURIES**

19 7. Plaintiff(s) allege(s) Defendants caused them the following categories of injury:

20 Bodily injuries

21 Emotional distress, including mental suffering, inconvenience,
22 interference with normal and usual activities.

23 Loss of consortium

24 Primary residence total loss

25 Primary residence partial loss

26 Smoke and ash damage

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.

- 1 Secondary residence
- 2 Other structures total loss
- 3 Other structures partial loss
- 4 Real property improvements (fences, roads, well, septic system, etc.)
- 5 destroyed
- 6 Real property improvements (fences, roads, well, septic system, 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

IV. DAMAGES

14 8. Plaintiff(s) allege(s) the following damages from the Master Complaint caused by
 15 Defendants:

16 **A. Categories of Damages Sought**

- 17 Damage to real property
- 18 Loss of personal property
- 19 Lost wages or impairment of earning capacity, and/or business profits or
- 20 proceeds and/or any related displacement expenses
- 21 Loss of timber, trees, crops, livestock, animals, or vegetation
- 22 Lost business profits or proceeds
- 23 Alternative living or displacement expenses
- 24 Past and future medical expenses and incidental expenses
- 25 Emotional distress including mental suffering, inconvenience, interference
- 26 with normal and usual activities
- Loss of consortium

- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff(s) suffered economic damages in an amount not to exceed \$5 million.
- 10. Plaintiff(s) suffered non-economic damages in an amount not to exceed \$25 million.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants for \$30 million 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.

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1571

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

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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 #1572 - Winter Brunelle

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Winter Brunelle,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 994 North Glenview Loop, Otis Oregon 97368

12
13
14 5. Current Mailing Address:

15 Winter Brunelle
16 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
17 601 SW Second Avenue
18 Suite 1900
19 Portland, OR 97204

20 6. Fire Name:

21 Echo Mountain Complex

22 Santiam Canyon

23 South Obenchain

24 242

25
26 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.

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 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1573 - Emilee Robins

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Emilee Robins,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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SEATTLE, WA 98101
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EDELSON PC
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Emilee Robins

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 24368 Taylor Park Road SE, Lyons Oregon 97358

12
13 5. Current Mailing Address:

14 Emilee Robins
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1573 - 2

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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1574 - Kevin Callaghan

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Kevin Callaghan,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.
209 S.W. OAK STREET
PORTLAND, OREGON 97204
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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

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 Kevin Callaghan

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 438 North Yodel Lane, Otis Oregon 97368

11 5. Current Mailing Address:

12 Kevin Callaghan
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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.
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1575 - Cherie Robertson-Girod

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Cherie Robertson-Girod,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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determine Plaintiff's damages against Defendants by and through the undersigned counsel.

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action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Cherie Robertson-Girod

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 825 Northwest Santiam Boulevard, Mill City Oregon 97360

11 5. Current Mailing Address:

12 Cherie Robertson-Girod
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

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26 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
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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

- 3 Bodily injuries
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of personal property
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- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
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C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
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16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1576 - John Bock

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

John Bock,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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

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3 2. Plaintiff expressly incorporates by reference the jury verdicts from Phase 1, as if
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5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 John Bock

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 7883 Salmon River Highway, Otis Oregon 97368

11 5. Current Mailing Address:

12 John Bock

13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC

14 601 SW Second Avenue

15 Suite 1900

16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

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26 ¹ For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of
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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1576 - 2

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1 **III. CATEGORIES OF INJURIES**

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22 **IV. DAMAGES**

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24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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B. Amount of Damages Sought

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15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1577 - Juan Collier

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Juan Collier,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

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

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5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Juan Collier

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 776 North Panther Creek Road, Otis Oregon 97368

11 5. Current Mailing Address:

12 Juan Collier
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1577 - 2

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1 **III. CATEGORIES OF INJURIES**

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24 Defendants:

25 **A. Categories of Damages Sought**

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1578 - Gabriel David Voth

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Gabriel David Voth,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Gabriel David Voth

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 11411 Rowena Avenue Southeast, Lyons Oregon 97358

11 5. Current Mailing Address:

12 Gabriel David Voth
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1578 - 2

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

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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
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<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1579 - Brian McKillop

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Brian McKillop,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 47389 East Lyons Mill City Drive, Lyons Oregon
11 97358

12 5. Current Mailing Address:

13 Brian Mckillop
14 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
15 601 SW Second Avenue
16 Suite 1900
17 Portland, OR 97204

18 6. Fire Name:

19 Echo Mountain Complex

20 Santiam Canyon

21 South Obenchain

22 242

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26 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.

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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1580 - Nicholas Martin

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Nicholas Martin,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 Nicholas Martin

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 89 North Echo Drive, Otis Oregon 97368

11 5. Current Mailing Address:

12 Nicholas Martin
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1580 - 2

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

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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 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
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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
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<input checked="" type="checkbox"/>	3	Private Nuisance
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<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1581 - Caitlin Rose Lyon

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Caitlin Rose Lyon,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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:

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Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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.
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SEATTLE, WA 98101
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Caitlin Rose Lyon

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 4745 Butte Falls Highway, Eagle Point Oregon 97524

11 5. Current Mailing Address:

12 Caitlin Rose Lyon
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1581 - 2

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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 Smoke and ash damage
- 10 Secondary residence
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1582 - DeAnne Duedall

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

DeAnne Duedall,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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

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 DeAnne Duedall

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 350 North Vista Terrace, Otis Oregon 97368

11 5. Current Mailing Address:

12 DeAnne Duedall
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1582 - 2

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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 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1582 - 4

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1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1583 - Janice Lee Hohler

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Janice Lee Hohler,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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.

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1. Plaintiff expressly incorporates by reference the Fifth Amended Complaint in
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Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

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

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Janice Lee Hohler

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 115 North Corkhill Lane, Otis Oregon 97368

11 5. Current Mailing Address:

12 Janice Lee Hohler
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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
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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,
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- 7 Primary residence total loss
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- 10 Secondary residence
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1584 - Sarah Lally

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Sarah Lally,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1584 - 1

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

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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 Sarah Lally

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 4869 Northeast 50th Street, Neotsu Oregon 97364

11 5. Current Mailing Address:

12 Sarah Lally
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 ¹ For purposes of this short-form complaint, a priority plaintiff is a party who is over 70 years of
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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

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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 **IV. DAMAGES**

22

23 8. Plaintiff alleges the following damages from the Master Complaint caused by
24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1584 - 3

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- Loss of personal property
- Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses
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- Any other loss, expenses, costs, or damages
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- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
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2 **V. CAUSES OF ACTION ASSERTED**

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15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1585 - Ryan Felluca

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Ryan Felluca,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1585 - 1

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Ryan Felluca

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 1879 North North Bank Road, Otis Oregon 97368

11 5. Current Mailing Address:

12 Ryan Felluca
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1585 - 2

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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,
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- 20 Damage to timber, trees, crops, livestock, animals, or vegetation

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- 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
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- Past and future medical expenses and incidental expenses
- Emotional distress including mental suffering, inconvenience, interference with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1586 - Belinda L Boysun

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Belinda L Boysun,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1586 - 1

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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

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 Belinda L Boysun

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 1128 North River Bend Road, Otis Oregon 97368

11 5. Current Mailing Address:

12 Belinda L Boysun
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
16 Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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.

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 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 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
- 26

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
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15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1587 - Daniel Hines

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Daniel Hines,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Daniel Hines

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 257 North Fawn Drive, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Daniel Hines
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

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25
26 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
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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
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- 10 Secondary residence
- 11 Other structures total loss
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Loss of personal property
- Lost wages or impairment of earning capacity, and/or business profits or proceeds and/or any related displacement expenses
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- Lost business profits or proceeds
- Alternative living or displacement expenses
- Past and future medical expenses and incidental expenses
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- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1588 - Stephen Hicks

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Stephen Hicks,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1588 - 1

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SEATTLE, WA 98101
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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Stephen Hicks

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 375 N. Vista Terrace, Otis, OR 97368; 376 N. Vista Terrace, Otis, OR 97368

11 5. Current Mailing Address:

12 Stephen Hicks
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC 601 SW Second Avenue
14 Suite 1900
15 Portland, OR 97204

16 Fire Name:

17 6.

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

21 242

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26 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
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- 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

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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- Any other loss, expenses, costs, or damages
- Costs
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- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

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<input checked="" type="checkbox"/>	6	Injunction

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13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1589 - Fallon Hoy

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Fallon Hoy,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

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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 Fallon Hoy

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 363 North Santiam Highway Apt. 2, Gates, Oregon
12 97346

13 5. Current Mailing Address:

14 Fallon Hoy
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
Suite 1900
Portland, OR 97204

17 6. Fire Name:

18 Echo Mountain Complex

19 Santiam Canyon

20 South Obenchain

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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.

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1589 - 2

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22 **IV. DAMAGES**

23 8. Plaintiff alleges the following damages from the Master Complaint caused by

24 Defendants:

25 **A. Categories of Damages Sought**

- 26 Damage to real property

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B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
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16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1590 - Kaeleen Holmgren

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Kaeleen Holmgren,

Plaintiff,

v.

PACIFICORP, an Oregon corporation; and
PACIFIC POWER, an Oregon registered
electric utility and assumed business name of
PACIFICORP,

Defendants.

SHORT FORM COMPLAINT AND JURY
DEMAND (INDIVIDUAL AND ENTITY
PLAINTIFFS)

Case Assigned to: Hon. Steffan Alexander

JURY TRIAL DEMANDED

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**

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
Complaint") into this Short Form Complaint as if fully set forth herein except any causes of
action from the *James* Fifth Amended Complaint not adopted in Section IV below. Plaintiff
reserves the right to amend all portions of this complaint, explicitly anticipates doing so as
discovery continues, and further reserves the right to increase the total amount of damages

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1590 - 1

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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 forth herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Kaeleen Holmgren

8
9 Priority Plaintiff¹

10 4. All Affected Property Addresses:

11 438 North Yodel Lane, Otis Oregon 97368

12
13 5. Current Mailing Address:

14 Kaeleen Holmgren
15 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
16 601 SW Second Avenue
17 Suite 1900
18 Portland, OR 97204

19 6. Fire Name:

20 Echo Mountain Complex

21 Santiam Canyon

22 South Obenchain

23 242

24
25
26 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.

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 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 **A. Categories of Damages Sought**

- 26 Damage to real property

MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1590 - 3

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- 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 with normal and usual activities
- Loss of consortium
- Any other loss, expenses, costs, or damages
- Costs
- Pre- and post-judgment interest
- Double the amount of economic and property damages
- Further relief as the Court deems equitable and just

B. Amount of Damages Sought

- 9. Plaintiff suffered economic damages in an amount not to exceed \$5,000,000.
- 10. Plaintiff suffered non-economic damages in an amount not to exceed \$25,000,000.

C. Punitive Damages Sought

- 11. 0.25 times the amount of economic and noneconomic damages.

1
2 **V. CAUSES OF ACTION ASSERTED**

3 12. The following Causes of Action asserted in the Master Complaint and the
4 allegations and Phase I verdict with regard thereto are adopted into this Short Form Complaint:

5

Check if Applicable	Cause of Action Number	Cause of Action
<input checked="" type="checkbox"/>	1	Negligence
<input checked="" type="checkbox"/>	2	Gross Negligence
<input checked="" type="checkbox"/>	3	Private Nuisance
<input checked="" type="checkbox"/>	4	Public Nuisance
<input checked="" type="checkbox"/>	5	Trespass
<input checked="" type="checkbox"/>	6	Injunction

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12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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Short-Form Complaint #1591 - Gary Hohler

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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 herein.

5 **II. PLAINTIFF**

6 3. Plaintiff Name:

7 Gary Hohler

8 Priority Plaintiff¹

9 4. All Affected Property Addresses:

10 115 North Corkhill Lane, Otis Oregon 97368

11 5. Current Mailing Address:

12 Gary Hohler
13 c/o Keller Rohrback LLP, Stoll Berne, and Edelson PC
14 601 SW Second Avenue
15 Suite 1900
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MASS SHORT FORM COMPLAINT #6 – COMPLAINT #1591 - 2

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1 **III. CATEGORIES OF INJURIES**

2 7. Plaintiff alleges Defendants caused Plaintiff the following categories of injury:

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- 18 Renter total loss
- 19 Renter partial loss
- 20 Damage to timber, trees, crops, livestock, animals, or vegetation

21 **IV. DAMAGES**

22 8. Plaintiff alleges the following damages from the Master Complaint caused by

23 Defendants:

24 **A. Categories of Damages Sought**

- 25 Damage to real property
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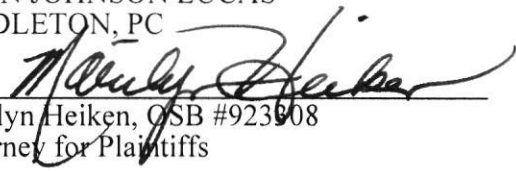
12
13 WHEREFORE, Plaintiff prays for relief and judgment against Defendants for
14 \$30,000,000 together with pre and post-judgment interest, costs, attorneys' fees, doubling of
15 economic and property damages under ORS 477.089, punitive damages, injunctive relief, and all
16 other relief as the Court deems proper, equitable, and just, and as set forth in the Master
17 Complaint.

18 **VI. JURY DEMAND**

19 Plaintiff hereby demands a trial by jury.
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1 RESPECTFULLY SUBMITTED this 14th day of January, 2025.

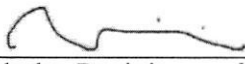
2 JOHNSON JOHNSON LUCAS
& MIDDLETON, PC

3 By: s/ 
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5 Attorney for Plaintiffs

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7 Eugene, OR 97401
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11 EDELSON PC

12 By: s/ 
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14 Attorney for Plaintiffs

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SIGNATURE PAGES - 1
(20cv33885)

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**Admitted Pro Hac Vice*

Attorneys for Plaintiffs

Trial Attorney: Cody Berne

SIGNATURE PAGES - 3
(20cv33885)

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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a correct copy of the foregoing **MASS SHORT FORM COMPLAINT #6** on the following named person(s) on the date and manner indicated below, addressed to said persons at the address of each shown below per UTCR 21.100 as follows:

Alison Plessman,
Stephanie W. Xiao,
Khoa D. Nguyen,
Rajan S. Trehan,
Christopher Galeano,
Tyler Dang
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rtrehan@hueston.com,
cgaleano@hueston.com,
tdang@hueston.com,
PacifiCorp_correspondence@hueston.com

By Hand Delivery
 By Overnight Delivery
 By Fax 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

Attorneys for Defendants

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Craig A. Fligor
Thomas King
Michael Schneider
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Newport Beach, CA 92660
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cfligor@hueston.com
tking@hueston.com
mschneider@hueston.com

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Attorneys for Defendants

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Per A. Ramfjord
Brad S. Daniels
Reilley D. Keating
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Katherine Shepherd
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Attorney for Defendants

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Joshua E. Dubin, Esq. P.A.
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212-219-1469
jdubin@dubinconsulting.com

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2 Christopher Lundberg
3 Christopher T. Griffith
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6 Portland, Oregon 97201
7 haglund@hk-law.com
8 clundberg@hk-law.com
9 cgriffith@hk-law.com

10 *Attorneys for Freres Timber, C.W. Specialty*
11 *Lumber, Frank Timber Resources, Inc.,*
12 *Frank Lumber Co., & Frank Pellets, LLC*
13 *Plaintiffs*

14 Brady Mertz
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16 685 Church St., NE
17 Salem, OR 97301
18 Tel: (503) 385-0121
19 brady@bradymertz.com

20 *Attorneys for Bell Plaintiffs*

21 Rick Klingbeil
22 RICK KLINGBEIL PC
23 1826 NE Broadway, 3rd Fl
24 Portland OR 97232
25 rick@klingbeil-law.com

26 *Attorneys for Bell Plaintiffs*

Alexander "Trey" Robertson IV
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arobertson@arobertsonlaw.com

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Dated this 14th day of January, 2025.

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