

EXHIBIT I

1 JENNER & BLOCK LLP
Reid J. Schar (*pro hac vice*)
2 RSchar@jenner.com
353 N. Clark Street
3 Chicago, IL 60654-3456
Telephone: (312) 222-9350
4 Facsimile: (312) 527-0484

5 CLARENCE DYER & COHEN LLP
Kate Dyer (Bar No. 171891)
6 kdyer@clarencedyer.com
899 Ellis Street
7 San Francisco, CA 94109-7807
Telephone: (415) 749-1800
8 Facsimile: (415_ 749-1694

9 CRAVATH, SWAINE & MOORE LLP
Kevin J. Orsini (*pro hac vice*)
10 korsini@cravath.com
825 Eighth Avenue
11 New York, NY 10019
Telephone: (212) 474-1000
12 Facsimile: (212) 474-3700

13 Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.

20 PACIFIC GAS AND ELECTRIC
21 COMPANY,

22 Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED] IN
SUPPORT OF RESPONSE TO ORDER
REQUESTING INFORMATION ON
DIXIE AND BADER FIRES**

Judge: Hon. William Alsup

1 I, [REDACTED] declare at follows:

2 1. I am currently employed by Pacific Gas and Electric Company (“PG&E”) as a
3 Troublemaker in the Oroville area. I make this declaration based upon personal knowledge and if
4 called as a witness, I could and would testify competently to the matters set forth herein.

5 2. On July 14, 2021, I received a call from a supervisor near the end of my shift,
6 which was scheduled to end at about 3:30pm, asking me to go to Bader Mine Road. I immediately
7 headed to the scene and arrived at approximately 3:45pm. When I arrived at the scene, I observed
8 two fire engines and two Cal Fire pickup trucks were on the scene and that the fire had been
9 suppressed. The area was covered with suppressant that appeared to have been dropped from the
10 air.

11 3. I observed a tree fallen on a two-phase section of the distribution line that runs
12 along Bader Mine Road—one phase had snapped, and the tree was leaning on the other phase. I
13 asked the Cal Fire investigator on the scene for permission to cut the phase that had snapped and
14 to cut the tree off of the other phase to make the area safe until the line could be repaired. The Cal
15 Fire investigator gave me permission. I then trimmed the snapped phase around the adjacent poles
16 so that the broken line would hang at least 10 feet above the ground. I also cut the tree off of the
17 other phase with a saw. I did not observe any damage to any pole or to any line other than the
18 phase that had snapped. I departed the scene after determining that it was safe and that I was no
19 longer needed.

20
21 I declare under penalty of perjury under the laws of the United States and the State of
22 California that the foregoing is true and correct.

23 Executed this 28th day of July, 2021, in the City of Oroville, County of Butte, State of
24 California. [REDACTED]