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13 Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

16
17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.

20 PACIFIC GAS AND ELECTRIC
21 COMPANY,

22 Defendant.

Case No. 14-CR-00175-WHA

**RESPONSE TO FURTHER ORDER
REQUESTING RESPONSE AND RE
UPCOMING HEARING DATED AUGUST
19, 2021**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this response
2 to the Court’s August 19, 2021 Order. (Dkt. 1419.)

3 *PG&E shall please advise the Court in writing by AUGUST 24 AT NOON whether*
4 *it will produce the troubleman voluntarily, in person, at the hearing on September*
5 *13, 2021, at 2:00 p.m., without the necessity of a subpoena. Failing this, the Court*
6 *will issue a subpoena on its own and have it served by the U.S. Marshals Service.*
7 *PG&E shall by AUGUST 24 AT NOON also produce to the Court the home*
8 *address of the troubleman who reported the Dixie Fire. (This may be done under*
9 *seal.)*

10 *PG&E shall today serve a copy of this order, and the orders at Dkt. Nos. 1417 and*
11 *1418, on counsel for the troubleman.*

12 PG&E served a copy of the Court’s August 19 Order (Dkt. 1419) on the troubleman’s
13 counsel on August 19, 2021. PG&E thereafter contacted the troubleman’s counsel, who informed
14 PG&E that the troubleman will appear voluntarily without the necessity of a subpoena.

15 *By AUGUST 24 AT NOON, PG&E shall also produce under seal the name and address*
16 *where a subpoena may be served for the PG&E employee(s) who summarized to the*
17 *monitor the information about another employee who spotted a drone in a*
18 *contractor’s car on July 14.*

19 The names and addresses for service of process of the employees who summarized to the
20 monitor on July 22, 2021 information known to PG&E at the time about the drone issue are
21 provided in Exhibit Q.¹ The two employees will likewise appear voluntarily without the necessity
22 of a subpoena, should the Court request their appearance.
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27 ¹ Four people from PG&E were present on that call but only two summarized or discussed the
28 drone.

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Dated: August 24, 2021

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

Exhibit Q

**FILED UNDER
SEAL**