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*Attorneys for John Trotter, Trustee of the PG&E Fire Victim Trust*

[Additional counsel appear in signature block]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOHN TROTTER, Trustee of the PG&E FIRE  
VICTIM TRUST,

Plaintiff,

v.

ANTHONY F. EARLEY, JR., JASON P.  
WELLS, GEISHA J. WILLIAMS, PATRICK  
M. HOGAN, JULIE M. KANE, DINYAR B.  
MISTRY, DAVID S. THOMASON, LEWIS  
CHEW, FRED J. FOWLER, MARYELLEN C.  
HERRINGER, JEH C. JOHNSON, RICHARD  
C. KELLY, ROGER H. KIMMEL, RICHARD  
A. MESERVE, FORREST E. MILLER, ERIC  
D. MULLINS, ROSENDO G. PARRA,  
BARBARA L. RAMBO, ANNE SHEN  
SMITH, NICKOLAS STAVROPOULOS, and  
BARRY LAWSON WILLIAMS,

Defendants,

and

PG&E CORPORATION and PACIFIC GAS  
AND ELECTRIC COMPANY,  
Nominal Defendant.

Case No. 5:18-cv-07128-EJD

**STIPULATION AND  
~~PROPOSED~~ ORDER  
VOLUNTARILY  
DISMISSING ACTION**

1           **WHEREAS**, on December 21, 2018, Plaintiff Ron Williams filed the present  
2 shareholder derivative complaint on behalf of Nominal Defendant PG&E Corporation and  
3 Pacific Gas and Electric Company (“PG&E”) against the Individual Defendants;<sup>1</sup>

4           **WHEREAS**, on January 29, 2019, PG&E commenced a voluntary Chapter 11 proceeding  
5 (the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Northern District of  
6 California (the “Bankruptcy Court”);

7           **WHEREAS**, Justice John Trotter (Ret.) has been appointed as the Trustee of the PG&E  
8 Fire Victim Trust, with full authority to pursue the Assigned D&O Rights and Causes of Action  
9 on behalf of the PG&E Fire Victim Trust consistent with the terms of the PG&E Fire Victim Trust  
10 Documents and the Plan and Confirmation Order;

11           **WHEREAS**, on January 7, 2021, the Court entered an order substituting the Trust for  
12 Ron Williams as Plaintiff;

13           **WHEREAS**, the Trust has elected to pursue the relevant claims through related, first-filed  
14 actions pending in San Francisco Superior Court, and thus desires to voluntarily dismiss this  
15 action without prejudice;

16           **NOW, THEREFORE**, the parties stipulate and respectfully request that the Court enter  
17 the [proposed] order providing as follows:

- 18           1. Pursuant to F.R.C.P. 41(a), Plaintiff voluntarily dismisses this action, with all parties  
19 to bear their own costs and fees.

20 **IT IS SO STIPULATED.**

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25 <sup>1</sup> The “Individual Defendants” named in the complaint include: Anthony F. Earley, Jr., Jason P.  
26 Wells, Geisha J. Williams, Patrick M. Hogan, Julie M. Kane, Dinyar B. Mistry, David S.  
27 Thomason, Lewis Chew, Fred J. Fowler, Maryellen C. Herringer, Jeh C. Johnson, Richard C.  
28 Kelly, Roger H. Kimmel, Richard A. Meserve, Forrest E. Miller, Eric D. Mullins, Rosendo G.  
Parra, Barbara L. Rambo, Anne Shen Smith, Nickolas Stavropoulos, and Barry Lawson Williams.

1  
2 Dated: March 3, 2021

**BOTTINI & BOTTINI, INC.**  
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Dated: March 3, 2021

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1 Dated: March 3, 2021

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*Attorneys for Nominal Defendant PG&E and  
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13 Dated: March 3, 2021

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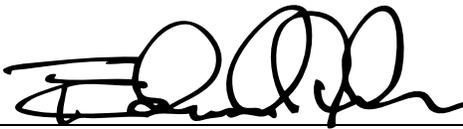
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Jason P. Wells, Anthony F. Earley, Jr., Julie M.  
Kane, Nickolas Stavropoulos, Dinyar B. Mistry,  
David S. Thomason, and Patrick M. Hogan*

\* \* \*

Pursuant to stipulation of the parties,

**IT IS SO ORDERED.**

Dated: 3/3/2021



EDWARD J. DAVILA  
UNITED STATES DISTRICT COURT JUDGE

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1 **ATTESTATION CLAUSE**

2 I, Francis A. Bottini, Jr., am the ECF User whose identification and password are being  
3 used to file this Stipulation and [Proposed] Order Voluntarily Dismissing Action. I hereby  
4 attest that the above-signed counsel have concurred in this filing. I declare under penalty of  
5 perjury under the laws of the United States of America that the foregoing is true and correct.  
6 Executed this 3rd day of March, 2021 at La Jolla, California.

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