

1 g. **The Global Climate Coalition (GCC)**: GCC was an industry group formed
2 to oppose greenhouse gas emission reduction policies and the Kyoto Protocol. It was founded in
3 1989 shortly after the first Intergovernmental Panel on Climate Change meeting was held, and
4 disbanded in 2001. Founding members included the National Association of Manufacturers, the
5 National Coal Association, the Edison Electric Institute, and the United States Chamber of
6 Commerce. The GCC's early individual corporate members included Amoco (BP), API, Chevron,
7 Exxon, Ford, Shell Oil, Texaco (Chevron) and Phillips Petroleum (ConocoPhillips). Over its
8 existence other members and funders included ARCO (BP), BHP, the National Mining
9 Association, and the Western Fuels Association. The coalition also operated for several years out
10 of the National Association of Manufacturers' offices.

11 **III. AGENCY**

12 40. At all times herein mentioned, each of the Defendants was the agent, servant,
13 partner, aider and abettor, co-conspirator, and/or joint venturer of each of the remaining
14 Defendants herein and was at all times operating and acting within the purpose and scope of said
15 agency, service, employment, partnership, conspiracy, and joint venture and rendered substantial
16 assistance and encouragement to the other Defendants, knowing that their conduct was wrongful
17 and/or constituted a breach of duty.

18 **IV. JURISDICTION AND VENUE**

19 41. This court's personal jurisdiction over Defendants named herein is proper because
20 each Defendant maintains substantial contacts with California by and through their fossil fuel
21 business operations in this state, as described above, and because Plaintiffs' injuries described
22 herein arose out of and relate to those operations and occurred in California.

23 42. The Superior Court of California for Contra Costa County is a court of general
24 jurisdiction and therefore has subject matter jurisdiction over this action.

25 43. Venue is proper in Contra Costa County pursuant to Code of Civil Procedure
26 sections 395 and 395.5, because Defendant Chevron maintains its corporate headquarters and
27 principal place of business in Contra Costa County.

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