

1 1989 shortly after the first Intergovernmental Panel on Climate Change meeting was held, and
2 disbanded in 2001. Founding members included the National Association of Manufacturers, the
3 National Coal Association, the Edison Electric Institute, and the United States Chamber of
4 Commerce. The GCC's early individual corporate members included Amoco (BP), API, Chevron,
5 Exxon, Ford, Shell Oil, Texaco (Chevron) and Phillips Petroleum (ConocoPhillips). Over its
6 existence other members and funders included ARCO (BP), BHP, the National Mining
7 Association, and the Western Fuels Association. The coalition also operated for several years out
8 of the National Association of Manufacturers' offices.

9 **III. AGENCY**

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

16 **IV. JURISDICTION AND VENUE**

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

21 42. The Superior Court of California for Marin County is a court of general jurisdiction
22 and therefore has subject matter jurisdiction over this action.

23 43. Venue is proper in Marin County pursuant to Code of Civil Procedure sections 395
24 and 395.5, the injuries giving rise to the County's claims occurred in Marin County.

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