

1 agency, service, employment, partnership, conspiracy, and joint venture and rendered substantial
2 assistance and encouragement to the other Defendants, knowing that their conduct was wrongful
3 and/or constituted a breach of duty.

4 **IV. JURISDICTION AND VENUE**

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

9 42. The Superior Court of California for San Mateo County is a court of general
10 jurisdiction and therefore has subject matter jurisdiction over this action.

11 43. Venue is proper in San Mateo County pursuant to Code of Civil Procedure sections
12 395 and 395.5 because the injury giving rise to the County’s claims occurred in San Mateo County.

13 **V. FACTUAL BACKGROUND**

14 **A. Global Warming—Observed Effects and Known Cause**

15 44. The Earth is warming at a rate unprecedented in human history.

16 45. Atmospheric and ocean temperatures have both increased substantially since the
17 beginning of the global industrial revolution, and the rate of warming has also dramatically
18 increased since the end of World War II.

19 46. In the geological short term, ocean and land surface temperatures have increased at
20 a rapid pace during the late 20th and early 21st centuries:

- 21 a. 2016 was the hottest year on record by globally averaged surface
22 temperatures, exceeding mid-20th century mean ocean and land surface
23 temperatures by approximately 1.69–1.78° F.²¹ Eight of the twelve months
24 in 2016 were hotter by globally averaged surface temperatures than those
25 respective months in any previous year. October, November, and December

26
27 ²¹ NOAA, Global Summary Information – December 2016, [https://www.ncdc.noaa.gov/sotc/summary-](https://www.ncdc.noaa.gov/sotc/summary-info/global/201612)
28 [info/global/201612](https://www.ncdc.noaa.gov/sotc/summary-info/global/201612); NASA, NASA, NOAA Data Show 2016 Warmest Year on Record Globally (January 18, 2017),
<https://www.nasa.gov/press-release/nasa-noaa-data-show-2016-warmest-year-on-record-globally>.