

Records indicate that you may have owned or resided on property as of September 7, 2020 in an area burned by one of the fires listed below (collectively, the “Fires”):

Echo Mountain Fire (including the Kimberling Fire)
South Obenchain Fire
242 Fire
Santiam Canyon Fire

A class action lawsuit may affect your rights.

A Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A class action lawsuit has been filed against PacifiCorp and Pacific Power (collectively, “PacifiCorp”) alleging that PacifiCorp’s acts and/or omissions caused or contributed to the Fires around Labor Day 2020 that damaged or destroyed homes and property of thousands of people. The lawsuit is pending in Multnomah County Circuit Court in Portland, Oregon and is presided over by Judge Steffan Alexander.
- PacifiCorp denies that it caused or contributed to the Fires, denies that its acts or omissions violated any law or legal requirement, and denies that it is liable to any plaintiff. Likewise, no judge or jury has concluded that PacifiCorp caused or contributed to the Fires, violated any law or legal requirement, or is liable to anyone.
- The Court has certified a class of certain owners and residents of real, mobile, and other property (the “Class”) for a trial of certain issues (the “Certified Issues”) related to PacifiCorp’s alleged responsibility for the fires. You are a member of the Class if you fall within either of the following criteria:
 - (A) Owners or residents, as of September 7, 2020, of any privately owned real property that is wholly or partially within the boundary of the maximum extent of burn for the Echo Mountain (including the Kimberling Fire), South Obenchain, or 242 fires, or for the Santiam Canyon fires, is wholly or partially within the boundary in Map 4a below, and experienced fire activity during those fires; or
 - (B) Owners of a motorhome, residential trailer, manufactured dwelling, other mobile home, or any other personal property that, as of September 7, 2020, was located on any property in the same area, experienced fire activity during the Fires, and whose personal property experienced fire damage during the Fires.

Maps showing the boundaries for the Fires covered by this case are contained in this Notice.

- A jury trial of the Certified Issues (the “Issues Trial”) has been scheduled to start on April 24, 2023. The Certified Issues to be decided at the Issues Trial are listed under Question 6 in this Notice.
- **There is no money or other benefit available now, nor is there any guarantee that there will be.** At the conclusion of the Issues Trial, depending on the result, any individual in the Class may have to commence their own lawsuit against PacifiCorp if they want to obtain any financial compensation. However, if you are a Class Member, your legal rights are affected by the upcoming Issues Trial, whether you act or don’t act, and **you have a choice to make now:**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

Do Nothing	<p>Stay in this lawsuit. Await the outcome. Enjoy the benefits of the lawsuit if Plaintiffs prevail, but be bound to the outcome either way, and give up the right to litigate whether PacifiCorp is liable for your fire-related damages in your own lawsuit.</p> <p>If you do nothing, you will remain a member of the Class. You will be able to use any favorable findings a jury makes on the Certified Issues in a future proceeding to determine whether you are entitled to compensation. But you will be bound to the outcome of the Issues Trial regardless of whether Plaintiffs win or lose, and you will give up any right to challenge a final determination of the Certified Issues that is unfavorable to the Class.</p>
Ask To Be Excluded No Later Than December 6, 2022	<p>Get out of this lawsuit. Get no benefit from it, but preserve your right to litigate whether PacifiCorp is liable for your fire-related damages in your own lawsuit.</p> <p>If you ask to be excluded from the lawsuit and a determination is made on any of the Certified Issues, at or before the Issues Trial, you won't be bound by that finding. If you wanted to bring your own lawsuit against PacifiCorp regarding this subject matter, you will need to prove your claims on your own.</p>

- These rights and options are explained in this Notice. To be excluded, you must ask to be excluded before December 6, 2022 or you will be bound by the results of the Issues Trial.
- Lawyers must prove the Certified Issues against PacifiCorp at the Issues Trial, which the Court has scheduled to start on April 24, 2023.
- **Any questions? Read on or visit www.PacifiCorpFireLitigation.com.**

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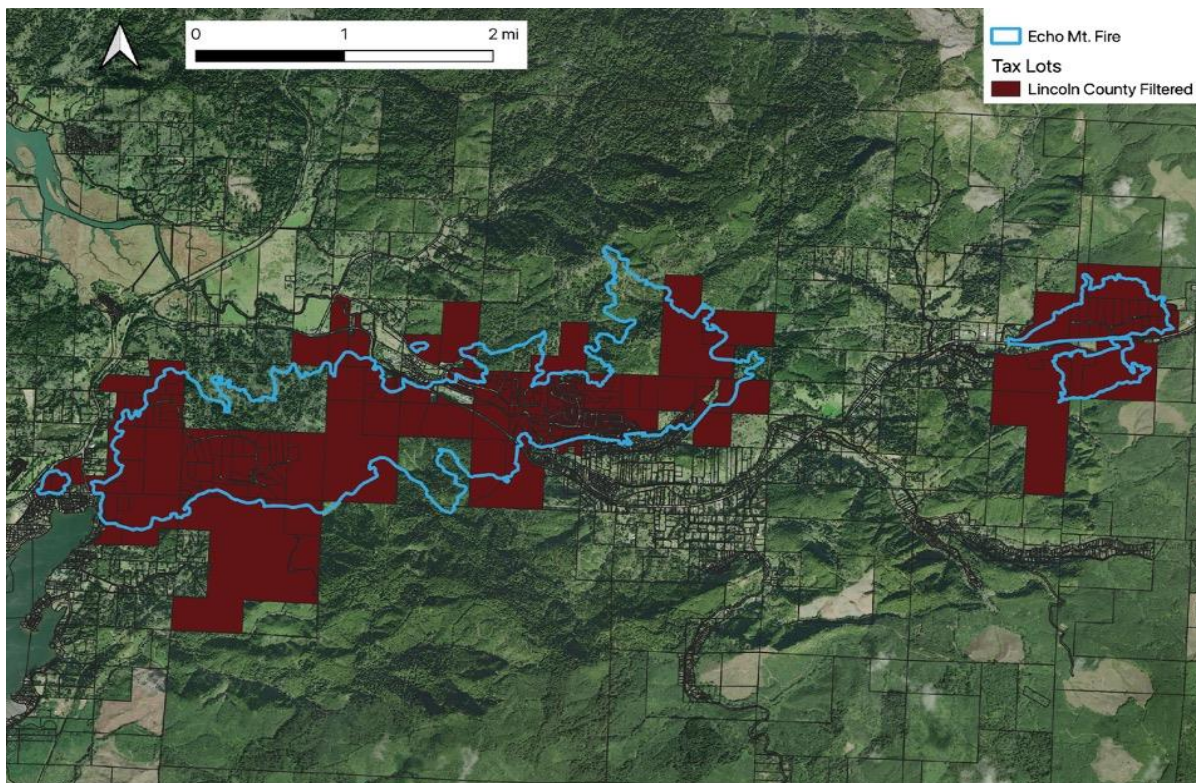
BASIC INFORMATION

1. Why did I get this Notice?

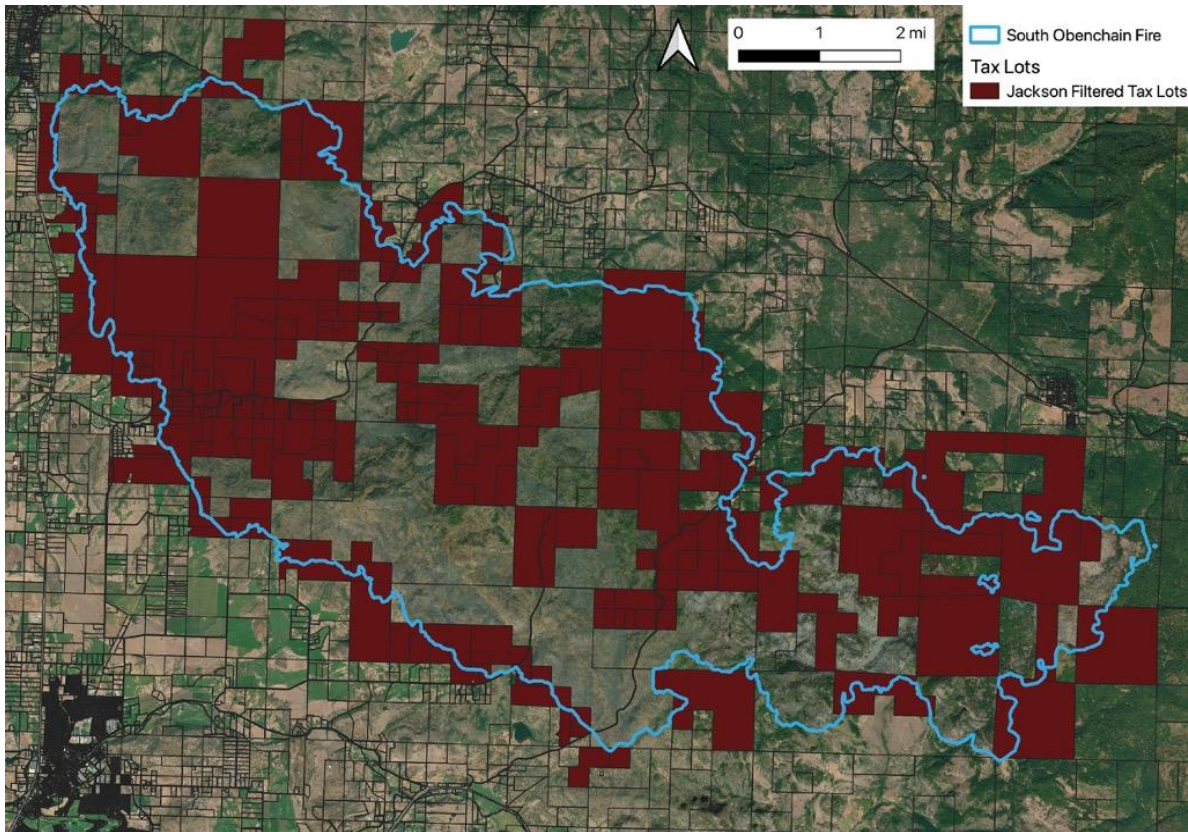
Property records show that you may have currently or previously owned or resided on property in one of the areas alleged to have been burned by the Echo Mountain Fire (including the Kimberling Fire), South Obenchain Fire, 242 Fire, or Santiam Canyon Fire, on or after Labor Day 2020. Each fire's perimeter is shown by the blue line on the maps below. The areas shaded in red on the maps below identify the private property parcels that are entirely or partially within the fire perimeter and which Plaintiffs' expert witnesses contend experienced fire activity.

The Court has allowed, or "certified," a Class of property owners and residents to try the Certified Issues identified below, which will be decided for all Class Members except those who exclude themselves from this lawsuit. You have legal rights and options that you may exercise before the Court holds a trial to resolve the answers to those Certified Issues. If you wish to exclude yourself from this lawsuit, which is explained more fully below, you have to do so by **December 6, 2022**. Judge Steffan Alexander, of the Circuit Court of the State of Oregon for the County of Multnomah, is overseeing this lawsuit. The lawsuit is known as *James et al. v. PacifiCorp et al.*, Case No. 20CV33885. Please do not contact the Court or PacifiCorp regarding this case. If you have questions, please call 844-633-0692 or visit www.PacifiCorpFireLitigation.com.

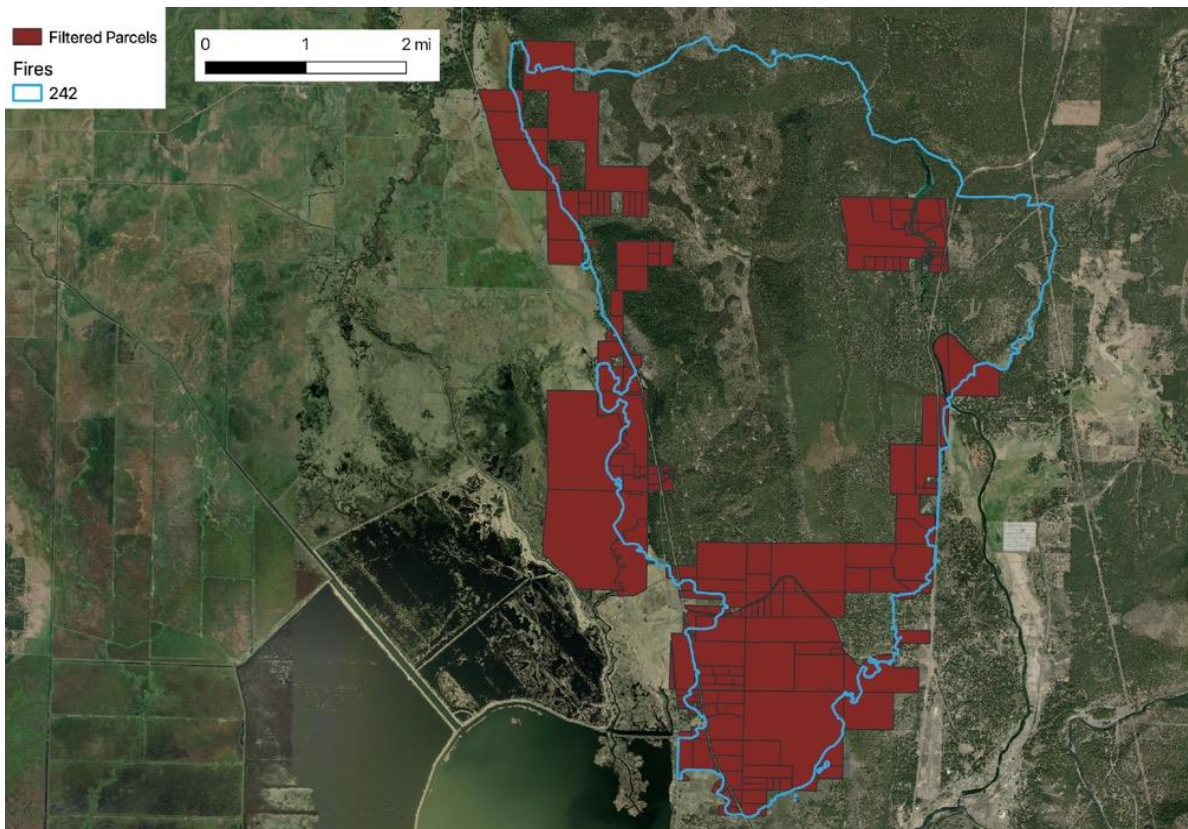
Map 1: Parcels Wholly or Partially Within the Boundary of the Maximum Extent of Burn for the **Echo Mountain Fire (Including the Kimberling Fire)**, which Plaintiffs' Expert Witnesses Contend Experienced Fire Activity During that Fire



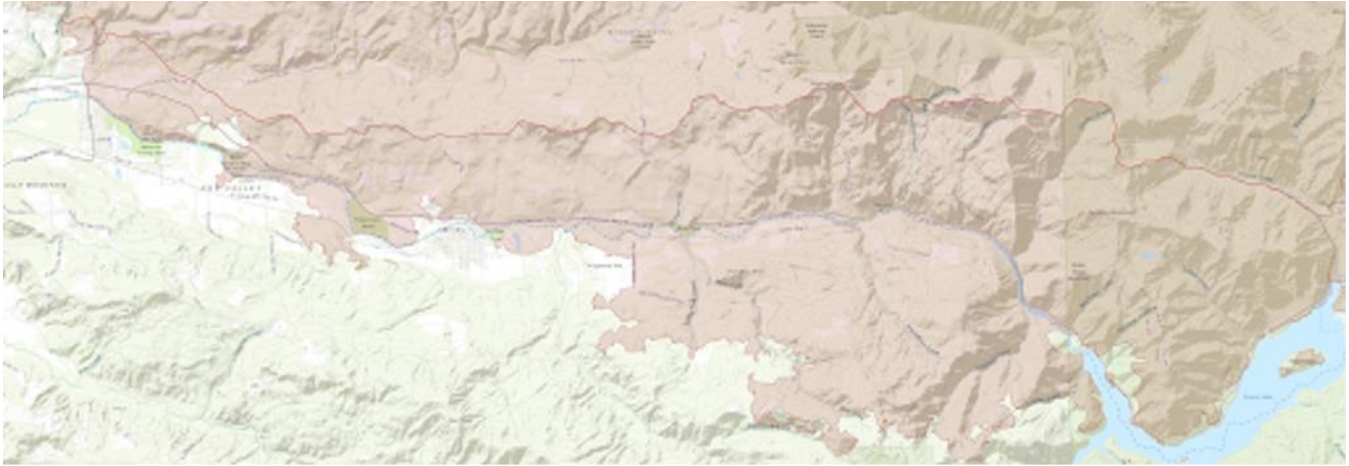
Map 2: Parcels Wholly or Partially Within the Boundary of the Maximum Extent of Burn for the **South Obenchain Fire**, which Plaintiffs' Expert Witnesses Contend Experienced Fire Activity During that Fire



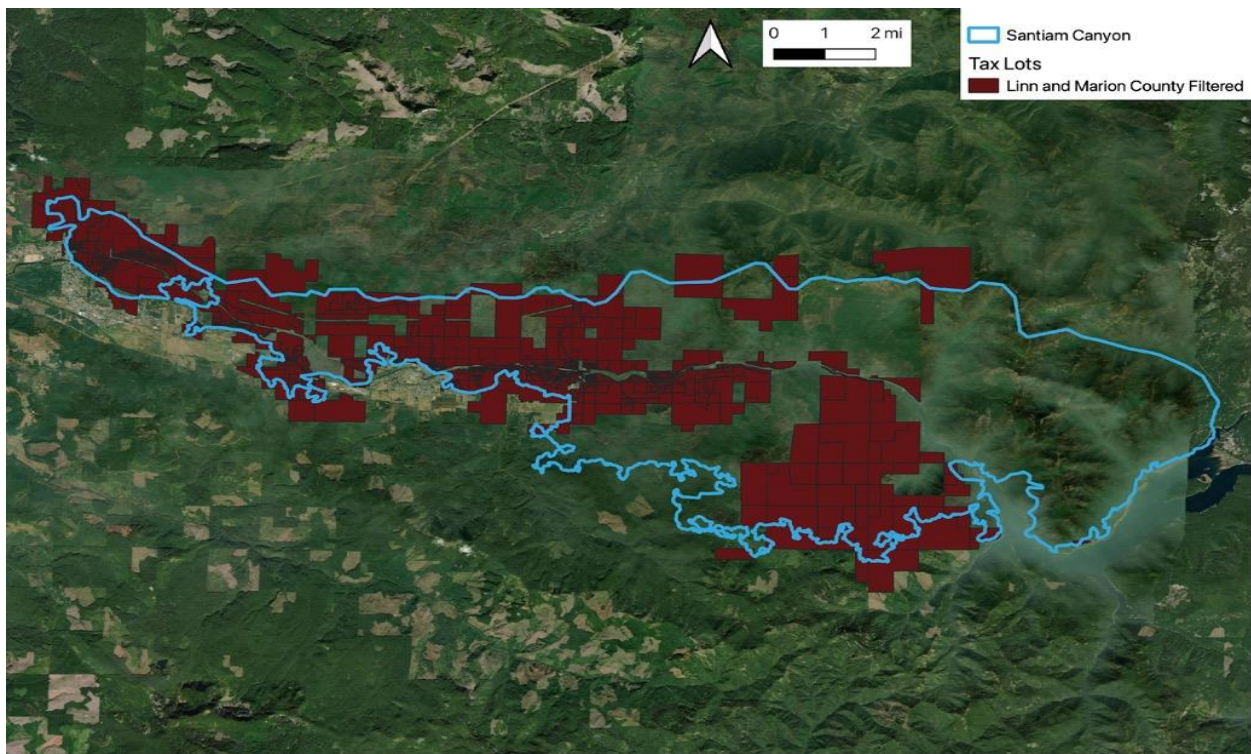
Map 3: Parcels Wholly or Partially Within the Boundary of the Maximum Extent of Burn for the **242 Fire**, which Plaintiffs' Expert Witnesses Contend Experienced Fire Activity During that Fire



Map 4a: Boundary for **Santiam Canyon Fire** as Defined in This Lawsuit (South of the red line)



Map 4b: Parcels Wholly or Partially Within the Boundary in Figure 4a (for the **Santiam Canyon Fire**), which Plaintiffs' Expert Witnesses Contend Experienced Fire Activity During that Fire



2. What is this lawsuit about?

This lawsuit is about whether PacifiCorp caused or contributed to, or is otherwise responsible or liable for, alleged damages caused by the Echo Mountain Fire (including the Kimberling Fire), South Obenchain Fire, 242 Fire, and Santiam Canyon Fire, all around Labor Day 2020. PacifiCorp denies the claims alleged against it and specifically denies that it caused or contributed to or is otherwise liable for the Fires in question.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case, Jeanyne James, Robin Colbert, Wendell Carpenter, Jane Drevo, Sam Drevo, Brooke Edge, Bill Edge Sr., Lori Fowler, Iris Hampton, James Holland, Rachelle McMaster, Kristina Montoya, Northwest River Guides LLC, Shariene Stockton, and Kevin Stockton, Victor Palfreyman, Palfreyman Family Trust, and Duane Brunn) sue on behalf of a group of people who have similar claims. The people together are a “Class” or “Class Members.”

The people who sue—and all the Class Members like them—are called the “Plaintiffs.” The company the Plaintiffs sue (in this case PacifiCorp/Pacific Power) is called the “Defendant.” In a class action, the Court resolves the issues for everyone in the Class, except for those people who successfully exclude themselves from the Class.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action as to the Certified Issues, which will be decided during the Issues Trial, because this lawsuit meets the requirements of Oregon Rule of Civil Procedure 32, which governs class actions in Oregon courts. PacifiCorp has asked the Oregon Court of Appeals to allow it to appeal whether the lawsuit may proceed as a class action. More information about why the Court is allowing this lawsuit to be a class action, as well as the Court’s Order Granting, In Part, Defendants’ Motion to Certify Questions for Interlocutory Appeal, can be found in the Court’s Opinion and Order Granting Plaintiffs’ Motion for Issues Class Certification, which is available in the “Court Documents” section at www.PacifiCorpFireLitigation.com.

5. What is a Certified Issue?

This lawsuit is a class action as to the Certified Issues only. The Court has found that it would be appropriate to resolve certain issues for all Class Members (*i.e.*, owners or residents of private properties, and anyone who owned private property, within the specified geographic boundaries that experienced fire activity). When the Certified Issues are decided by a jury (subject to appellate review, if any, of any jury verdict), the final answers will forever bind any individual who: (1) is a member of the Class; and (2) does not ask to be excluded by **December 6, 2022**.

6. What are the Certified Issues in this lawsuit?

The Court has certified the following fourteen issues (the “Certified Issues”) for class-wide treatment. The Certified Issues are:

1. What was PacifiCorp’s level of culpable conduct in the operation of its utility infrastructure?
2. Was PacifiCorp’s operation of its utility infrastructure ultrahazardous or abnormally dangerous?
3. Was PacifiCorp’s conduct a cause of harm to the class?
4. If PacifiCorp’s conduct was a cause of harm to the class, was that harm reasonably foreseeable?
5. Did PacifiCorp’s action or inaction cause or contribute to the cause of the wildfire or cause or contribute to the spreading of the wildfire?
6. Did the fire originate on land used or capable of being used for growing forest tree species regardless of the existing use of the land?
7. Did PacifiCorp’s action or inaction bring about an unauthorized entry into property in the exclusive possession of another?

8. Did PacifiCorp’s culpable conduct cause the trespass or, alternatively, did PacifiCorp act intentionally, knowing that a trespass would result from their actions—and a trespass did indeed occur as a result of those actions?
9. Did PacifiCorp know, or have reason to know, that its electric utility infrastructure created an objectionable condition?
10. Did PacifiCorp realize, or should it have realized, that the objectionable condition created an unreasonable risk of substantial interference with the use and enjoyment of the Class Members’ property?
11. Was the utility of maintaining the objectionable condition slight compared with the risk?
12. Did PacifiCorp fail to exercise reasonable care to eliminate the risk?
13. Was PacifiCorp acting under authority of law when it caused damage to Class Members’ real or personal property?
14. Was the damage to Class Members’ property the necessary, certain, predictable, or inevitable result of PacifiCorp’s actions?

THE CLAIMS IN THE LAWSUIT

7. What does the lawsuit complain about?

In the lawsuit, Plaintiffs allege that PacifiCorp’s acts and/or omissions (such as alleged failure to prepare for fires, failure to properly maintain electrical equipment, and failure to manage vegetation that encroaches on equipment) caused or contributed to fires around Labor Day 2020 that damaged or destroyed Class Members’ homes and property. Plaintiffs claim that PacifiCorp’s conduct constituted negligence, gross negligence, public and private nuisance, trespass, and inverse condemnation. You can read the Plaintiffs’ Complaint and Second Amended Complaint in the “Court Documents” section at www.PacifiCorpFireLitigation.com.

8. How does PacifiCorp answer the allegations?

PacifiCorp denies Plaintiffs’ claims. Specifically, PacifiCorp denies that it caused or contributed to the Fires or is otherwise liable for them, denies that it did anything wrong or violated any law, and denies that Plaintiffs have been injured or damaged by reason of any carelessness, negligence, act, or omission of PacifiCorp. You can read PacifiCorp’s Answer to Plaintiffs’ Complaint in the “Court Documents” section at www.PacifiCorpFireLitigation.com.

9. Has the Court decided who is right?

No. The Court has not decided whether Plaintiffs or PacifiCorp is correct. By establishing the Class, certifying the Certified Issues, and ordering this Notice, the Court has not suggested that the Plaintiffs will win or lose this case. Plaintiffs must prove their claims at the Issues Trial.

10. What are the Plaintiffs asking for?

Plaintiffs are asking that each of the Certified Issues be decided in their favor and adversely to PacifiCorp.

If Plaintiffs are successful at the Issues Trial, Class Members may be required to come to Court to prove whether they are entitled to any damages and, if so, the amount of damages. This may be done by mini-trials, a contested claims process, the appointment of a special master, or some other procedure to be later established by the court overseeing this lawsuit.

11. Is there any money available now?

No. There is no money available now. Nor is there any guarantee that money or benefits will ever be awarded.

WHO IS IN THE CLASS?

You need to decide whether you are affected by this lawsuit.

12. Am I part of the Class?

The Court certified a Class consisting of the following individuals:

- (A) Owners or residents, as of September 7, 2020, of any privately owned real property that is wholly or partially within the boundary of the maximum extent of burn for the Echo Mountain (including the fire formerly known as the Kimberling Fire), South Obenchain, or 242 fires, or for the Santiam Canyon fires [that] is wholly or partially within the boundary in Figure 4a, and experienced fire activity during the Fires; or
- (B) owners of a motorhome, residential trailer, manufactured dwelling, other mobile home, or any other personal property that, as of September 7, 2020, was located on any property in the same area, experienced fire activity during those fires, and whose personal property experienced fire damage during the Fires.

If you fit these criteria, you may be a Class Member. Class Members should have received this Notice in the mail and the maps included above show the impacted properties.

13. I am still unsure if I am included.

If you are still not sure whether you are included, you can get free help at www.PacifiCorpFireLitigation.com, or by contacting the law firms appointed as Lead Counsel in this case: Stoll Stoll Berne Lokting & Shlachter PC (“Stoll”), Keller Rohrback LLP (“Keller”), and Edelson PC (“Edelson”). These firms are called “Lead Counsel,” and the Court has determined that these law firms are qualified to represent you and all Class Members. Lead Counsel are experienced in handling similar class action and fire cases. More information about Lead Counsel is available at www.edelson.com, www.KRComplexLit.com, and www.stollberne.com.

You can call Lead Counsel by dialing 503-217-6722 or 888-607-5808. Alternately, you can email Lead Counsel at PacifiCorpFireLitigation@edelson.com. Please **do not** contact the Court or PacifiCorp.

YOUR RIGHTS AND OPTIONS

You have to decide by **December 6, 2022** whether to allow the jury’s answers to the Certified Issues to be binding on you—whether they are favorable or unfavorable to your claim—or to ask to be excluded from the Class. You have to decide this now.

14. What happens if I do nothing at all?

By doing nothing, you are staying in the Class. If you stay in, you will be bound by whatever outcome is reached on the Certified Issues at the Issues Trial—regardless of whether the Plaintiffs win or lose.

If you remain in the Class and the Plaintiffs are successful at the Issues Trial, the decisions made by the jury against PacifiCorp in the Issues Trial will also apply to any claims for damages you choose to pursue against PacifiCorp. In other words, if Plaintiffs are successful at the Issues Trial, while you will still have to pursue your own claims if you seek to recover damages from PacifiCorp, you will *not* have to prove any of the Certified Issues that Plaintiffs are successful on in the Issues Trial.

15. Why would I ask to be excluded?

If you (i) already have your own lawyer and lawsuit against PacifiCorp related to the Echo Mountain Fire (including the Kimberling Fire), South Obenchain Fire, 242 Fire, or Santiam Canyon Fire, and you want to continue with that lawsuit without the benefit and risks of having the answers to the Certified Issues treated as binding on you, or (ii) otherwise do not want to be a part of this class-action lawsuit, then you must ask to be excluded by the **December 6, 2022** deadline.

If you exclude yourself—which is sometimes called “opting out”—you will not benefit from any beneficial ruling that may be reached on the Certified Issues. However, you may then be able to sue or continue to sue PacifiCorp without being bound by any adverse ruling on any of the Certified Issues. If you exclude yourself, you will not be automatically bound by the judgments in this action, whether favorable or unfavorable to the Plaintiffs.

If you start your own lawsuit against PacifiCorp after you exclude yourself, you will have to hire your own lawyer for that lawsuit, and you will have to prove your claims on your own. If you do exclude yourself so that you can start or continue your own lawsuit against PacifiCorp, then you should talk to your own lawyer soon to ensure you do not lose your ability to sue PacifiCorp, if you have a claim.

16. How do I ask the Court to exclude me from the Class?

To ask to be excluded, you must fill out and submit the “Exclusion Request” form, which can be found at www.PacifiCorpFireLitigation.com. You may also request that an Exclusion Request form be mailed to you by calling Lead Counsel at 503-217-6722 or 888-607-5808. The Exclusion Request must be mailed to the address below postmarked by **December 6, 2022**:

James, et al. v. PacifiCorp, et al.
c/o JND Legal Administration
PO Box 91348
Seattle, WA 98111

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

If you do not ask to be excluded, then in all proceedings on the Certified Issues, you will be represented by Lead Counsel: Stoll, Keller, and Edelson. The Court decided that these law firms are qualified to represent you and all Class Members. The law firms are experienced in handling similar class action and fire cases. More information about Lead Counsel is available at www.stollberne.com, www.KRComplexLit.com, and www.edelson.com.

18. Should I get my own lawyer?

You have the right to select a lawyer to represent you. If you have signed a retainer agreement with one or more of the law firms serving as Lead Counsel, you do not need to hire another lawyer for purposes of this lawsuit. If you have not signed an agreement with one or more of the law firms serving as Lead Counsel, you may choose to hire a different lawyer, *but you do not need to* because Lead Counsel is working on your behalf, so long as you do not ask to be excluded from the class, with respect to the Certified Issues.

If Plaintiffs are successful at the Issues Trial, you may want Lead Counsel to continue to represent you, or, if you wish, a different attorney who has not been involved in the litigation may be available to represent you in later proceedings to determine whether you are entitled to any damages and, if so, the amount of your damages. These later proceedings may or may not occur, depending on the outcome of the Issues Trial.

19. How will the lawyers be paid?

If Plaintiffs are successful at the Issues Trial and you subsequently obtain a financial judgment or settlement related to this case, they may ask the Court for fees and expenses. In that event, Class Members may be responsible for paying a portion of the financial award and reasonable case costs to Lead Counsel.

If you hire a different lawyer, you will have to pay for that lawyer.

THE ISSUES TRIAL

The Court has scheduled an Issues Trial to decide the fourteen Certified Issues for all members of the Class.

20. How and when will the Certified Issues be decided?

As long as the case is not otherwise resolved, Lead Counsel will have to prove at trial that some or all of the Certified Issues should be answered in Plaintiffs' favor.

During the Issues Trial, a jury will hear evidence and make a decision on some or all of the Certified Issues. There is no guarantee that the Plaintiffs will win on any or all of the Certified Issues. The Court has scheduled the Issues Trial to start on April 24, 2023.

21. Do I have to come to the Issues Trial?

You do not need to attend the Issues Trial. Lead Counsel will present the case for the Plaintiffs, and PacifiCorp will present the defense. You and/or your own lawyer are welcome to attend at your own expense.

22. Will I get money as a result of the Issues Trial?

No. The Issues Trial is only meant to answer the Certified Issues and the amount of damages for the class representatives. After the Certified Issues are answered, each Class Member will be responsible for proving, if they so choose, whether they are entitled to any damages and, if so, the amount of damages. PacifiCorp is also entitled to present its defenses to liability and to individual Class Members' claims. This may be done by mini-trials, a contested claims process, the appointment of a special master, or some other procedure to be later established by the court overseeing this lawsuit.

If you have previously signed a retainer agreement to be represented by an attorney regarding the claims in this lawsuit, you and your attorney will make a determination as to whether and how to proceed after the Issues Trial. There is no guarantee that any money will ever be awarded.

GETTING MORE INFORMATION

23. How do I get more information?

Visit the website www.PacifiCorpFireLitigation.com where you will find the Court's Opinion and Order Granting Plaintiffs' Motion for Issues Class Certification, the Complaint that the Plaintiffs filed, the Answer that PacifiCorp filed, as well as the Exclusion Request Form. You may also speak to someone about the case by calling 503-217-6722 or 888-607-5808, by emailing PacifiCorpFireLitigation@edelson.com or by writing to: Stoll Berne, c/o Cody Berne, 209 SW Oak Street, Suite 500, Portland, OR, 97204. Before doing so, however, please read this full Notice carefully.

Please do not call or write the Court or PacifiCorp for information or advice.