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20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

21 **FOR THE COUNTY OF LOS ANGELES**

22 PEOPLE OF THE STATE OF CALIFORNIA,

23 Plaintiff,

24 v.

25 SOUTHERN CALIFORNIA GAS COMPANY

26 Defendant.

Case No. 6SC00433

**DECLARATION OF R. REX PARRIS IN
SUPPORT OF VICTIMS' REPLY TO
PEOPLE'S OPPOSITION TO REQUEST
FOR WITHDRAWAL OF PLEA
AGREEMENT**

Declaration of R. Rex Parris

I, R. Rex Parris, declare:

I am an attorney duly licensed to practice before all courts of the State of California, and I am a principal in, and founding partner of, the Parris Law Firm, attorneys of record for Mr. Demetrius Crump and the victims listed in Exhibit 1. The facts set forth in this declaration are within my personal knowledge and, if called as a witness, I could and would competently testify as follows:

1. On February 12, 2016, a twenty year old man who grew up in Porter Ranch died. As a teenager, this client was diagnosed with a rare form of cancer linked to formaldehyde exposure. SoCalGas reported in its annual reports to AQMD that it releases massive amounts of formaldehyde. It is our understanding that the formaldehyde likely comes from the SoCalGas compressor station. – Our client grew up directly southwest of the compressor station. Of equal concern, his bedroom overlooked the Aliso Canyon facility during the relevant time period. Attached hereto and incorporated herein by this reference as **Exhibit “A”** is a map derived from the Division of Oil, Gas and Geothermal website what we believe is the location of the compressor station in comparison to the victim’s home.

2. We attempted to obtain support from the county coroner to investigate the cause of this client’s death. The coroner declined the request, citing his belief that natural gas would not have caused the death.

3. This client’s family has yet to be reimbursed for their out of pocket costs related to the gas blowout. This includes, but is not limited to, the costs of the ambulance to transport the client as part of the evacuation of Porter Ranch.

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4. The unreimbursed costs of this client, like many hundreds of clients in Porter Ranch include the cost of cleaning the home. Attached hereto and incorporated herein by this reference as **Exhibit “B”** is a true and correct copy of a bid we received for the cleaning of this family’s home. It has been redacted to protect the name and address of the family.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 28, 2016 at Lancaster, California.

R. J. Carris

R. Rex Parris
Attorneys for Victims

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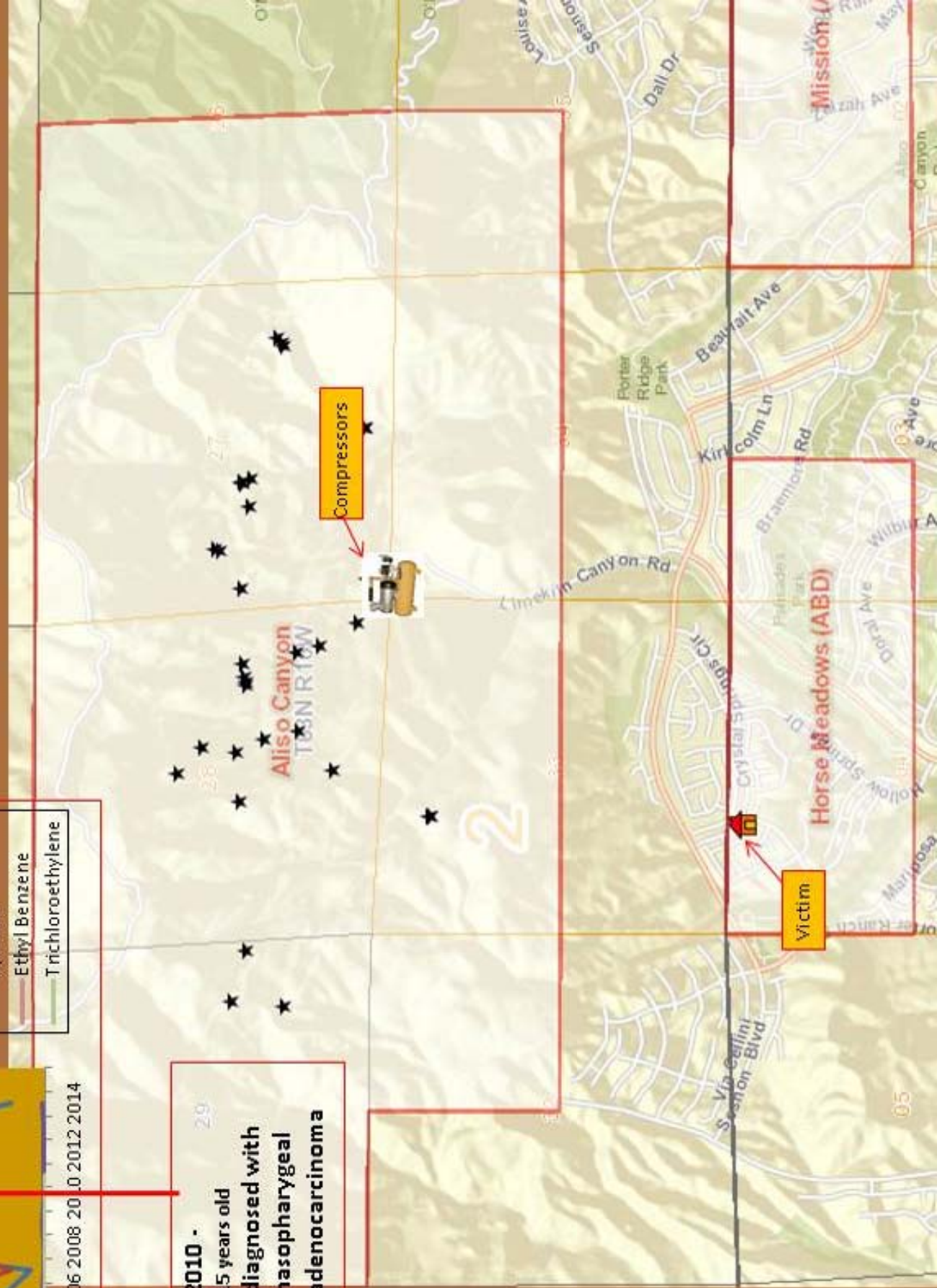
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2000 2002 2004 2006 2008 2010 2012 2014

2010 -
15 years old
diagnosed with
nasopharyngeal
adenocarcinoma

- Ammonia
- Formaldehyde
- Hexane
- Benzene
- Acrolein
- Toluene
- Xylenes
- Ethyl Benzene
- Trichloroethylene

★ Wells being repaired now





October 20, 2016

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Ms. Patricia Oliver, Esq.
R. Rex Parris Law Firm
43364 10th Street West
Lancaster, CA 93534

RE: [REDACTED] Northridge, CA 91326

Dear Ms. Oliver,

Below please find our quote to perform interior cleaning services at [REDACTED] in Northridge, CA. Our price includes all labor, supplies, equipment and disposal costs necessary to complete the interior cleaning services including but not limited to entrance areas, living room, family room, dining room, kitchen, bedrooms, hallways, staircase, bathrooms and garage but excluding attic.

<u>Description</u>	<u>Price</u>
Move all furniture and personal items to prepare for interior cleaning	\$ 3,050.00
Clean and sanitize all interior surfaces according to the LA County Public Health guidelines	\$10,000.00*
Shampoo carpeted areas and HEPA vacuum all upholstered furniture	\$ 2,500.00
Clean and sanitize the air conditioning unit, all air ducts, air vents and registers	\$ 1,500.00
Return all furniture and personal items back into home	\$ 2,500.00
Total	\$19,550.00

Based on our inspection last week, this project will take four (4) days to complete. The first day would be packing and moving the furniture and personal items into a POD/truck which will remain on premises. The second and third day is when all the cleaning would occur and the fourth day would be moving the furniture and personal items back into the home. Upon your approval, Dedicated will provide the Health and Safety plan as well as our Workplan for this project.

Please let me know if you have any questions or need additional information. I look forward to hearing from you and potentially working with your clients.

Cordially,

A handwritten signature in blue ink, appearing to be "DCS", written over a horizontal line.

Derek C. Smith
Manager

*Interior cleaning excludes any drapes and/or fabric window coverings. Dedicated can coordinate cleaning these items for an additional fee.

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 43364 10th Street West, Lancaster, California 93534. On November 28, 2016, I served the within document(s) described as:

**DECLARATION OF R. REX PARRIS IN SUPPORT OF VICTIMS' REPLY TO PEOPLE'S
OPPOSITION TO REQUEST FOR WITHDRAWAL OF PLEA AGREEMENT**

on the interested parties in this action as stated below:

***** Please See Attached List *****

X **BY ELECTRONIC SERVICE** as follows: Based on a court order, or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addressed listed on the attached Service List.

X **BY MAIL** as follows: By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth above. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U. S. postal service on that same day with postage thereon fully prepaid at Lancaster, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 28, 2016, at Lancaster, California.


Gina Bushey

ATTACHMENT TO PROOF OF SERVICE

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