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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

PALISADES FIRE LITIGATION

DAN GRIGSBY, et al.,

Plaintiff,

vs.

CITY OF LOS ANGELES ACTING BY AND
THROUGH THE LOS ANGELES
DEPARTMENT OF WATER AND POWER,
et al.,

Defendants.

AND ALL RELATED CASES

Electronically FILED by
Superior Court of California,
County of Los Angeles
11/24/2025 12:01 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Lara, Deputy Clerk

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Lead Case No. 25STCV00832

JOINT STATUS CONFERENCE REPORT

Date: November 25, 2025
Time: 10:00 a.m.
Dept.: 7

Assigned for All Purposes to:
Hon. Samantha Jessner, Dept 7

Action Filed: January 13, 2025
Trial Date: Not set

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12 *Attorneys for Defendant State of California acting by and through the State of California*
13 *Department of Parks and Recreation (also erroneously sued herein as California Department of*
14 *Parks and Recreation)*

1 Individual Plaintiffs and Defendants, the City of Los Angeles Acting By and Through the
2 Department of Water and Power (“City”), and the State of California, including California
3 Department of Parks and Recreation, (“State”), do hereby submit this Joint Status Conference
4 Report in advance of the November 25, 2025 status conference in the above-entitled action.

5 **A. Plaintiffs’ Depositions of LAFD Firefighters**

6 At the November 17, 2025 status conference, the Court ordered the parties to meet and
7 confer regarding depositions to preserve certain testimony of Los Angeles Fire Department
8 (“LAFD”) personnel who responded to the Lachman Fire between December 31, 2024 and
9 January 3, 2025. Specifically, the depositions are intended to preserve testimony regarding what
10 LAFD personnel perceived during that Lachman Fire response.

11 The Plaintiffs and the City have met and conferred and have agreed on a plan for these
12 depositions. The City provided Plaintiffs with a roster of over 100 LAFD personnel who were
13 listed as having responded to the Lachman Fire, and from that list, Plaintiffs have selected twelve
14 individuals to depose. Plaintiffs reserve the right to request additional depositions if, after twelve,
15 they believe more are warranted. And the City reserves the right to object to that further discovery.
16 Because these depositions (as described below) will be limited to issues relating to the Lachman
17 Fire, Plaintiffs reserve the right to request to recall these twelve individuals to depose them on the
18 response to the Palisades Fire or other non-cumulative topics, if necessary, if the Court lifts the
19 discovery stay. The City reserves the right to oppose any such requests, though it agrees that the
20 fact that these firefighters gave testimony about the Lachman Fire is not, by itself, a reason to
21 prevent further testimony outside the agreed scope of these Lachman Fire depositions.

22 Plaintiffs and the City have also agreed to the following ground rules for these depositions:
23 (1) questioning will be limited to basic biographical information and the deponents’ personal
24 observations while responding to the Lachman Fire between December 31, 2024 and January 3,
25 2025 and the response to any 911 calls reporting smoke from the Lachman burn scar between
26 January 3 and up until the reported start of the Palisades Fire at approximately 10:30 a.m. on
27 January 7th; (2) Plaintiffs’ Liaison counsel will designate one attorney to question each deponent,
28 and no other Plaintiffs’ attorneys will question that deponent (though Plaintiffs’ attorneys who are

1 not questioning the deponent may provide proposed questions to the questioning attorney); (3)
2 Plaintiffs may question each deponent for two and one half hours on the record; (4) one attorney
3 for the City of Los Angeles and one attorney for the State of California may question each
4 witness; (5) depositions will take place in person (at a location to be agreed between the City and
5 Plaintiffs' Liaison counsel); and (6) deposition participants must attend in person and no
6 participation by video or phone will be permitted.

7 Plaintiffs and the City respectfully request the Court enter the attached proposed order
8 memorializing the terms above.

9 **B. Plaintiffs' Requests for Written Discovery To City**

10 Besides depositions, Plaintiffs seek written discovery from the City related to the Lachman
11 Fire. The City oppose these requests.

12 **1. Plaintiffs' Position:**

13 Following the November 17th status conference where the Court asked the Plaintiffs to narrow
14 their requests for discovery, Liaison Counsel emailed a revised list of requested depositions and
15 documents to the City. The requested documents include:

16 1. Produce all communications (which includes all text messages, emails, instant
17 messaging platforms, or other written communication mediums) relating to the Lachman Fire for
18 each of the LAFD firefighters who responded to the Lachman Fire, and were involved in the mop
up of that fire between January 1 – January 7, 2025.

19 2. Produce all radio communication recordings, including but not limited to the LAFD's
20 Genesis system, from LAFD firefighters relating to the Lachman Fire between January 1 –
January 7, 2025.

21 3. Produce all communications with any representative of CA State Parks, including an
22 Agency Representative (AREP), Resource Advisor (READ) concerning the Lachman Fire
between January 1 – January 7, 2025.

23 4. All documents, including the Incident Action Plan (IAP) and Incident Management
24 Team Liaison Officer notes, for the Lachman Fire which identifies any representative from CA
State Parks at the Lachman Fire between January 1 – 7. 2025.

25 5. Identify all firefighters who responded to the 911 call (LAFD Incident #0695) for
26 reports of smoke coming from 100 Split Rock Fire Road and Temescal Fire Road at
approximately 11:51 a.m. on January 3, 2025 and produce any writings (which includes all text
27 messages, emails, instant messaging platforms, or other written communication mediums)
relating to this incident.

28 6. Identify any other 911 calls for reports of smoke showing from the vicinity of the
Lachman Fire burn scar between January 1, 2025 and approximately 10:00 a.m. on January 7,

1 2025 and produce an unredacted version of Incident Details for Incident #0695 (See attached).

2 7. Identify the representative from CA State Parks shown in the attached photo taken on
3 January 1, 2025 meeting on the Lachman Fire burn scar at 2:43 p.m. and identify the LAFD
4 Battalion Chief and three Captains shown in the photo.

5 We are now ten months post-fire and Plaintiffs believe that the requested documents may
6 help refresh the recollection of the LAFD firefighters who the City has agreed to produce for
7 deposition. With regard to the text messages between firefighters which were the subject of a
8 recent L.A. Times article, the City presumably is or will be collecting these messages in order to
9 comply with the federal grand jury subpoena reportedly issued for these very same
10 communications. Further, communications between CA State Park employees and LAFD about the
11 Lachman Fire for the limited 6 day time period is not burdensome. Likewise, the requests for
12 documents identifying the firefighters who responded to the January 3rd report of smoke coming
13 from the Lachman burn scar, or any other 911 calls reporting smoke during this 6 day period, are
14 both relevant and reasonable.

14 2. The City's Position:

15 In the last Joint Status Conference Report, Plaintiffs sought leave to serve the City with
16 written discovery related to the Lachman Fire and to take depositions. Their proposed requests
17 included communications from every firefighter involved in the response and mop-up efforts;
18 communications among LAFD, Los Angeles County Fire Department, and the Department of
19 State Parks; and radio recordings. Joint Status Conference Report, at 5–7 (Nov. 12, 2025).
20 Plaintiffs also requested to depose a dozen LAFD firefighters allegedly present at the fire scene.
21 *Id.* at 5.

22 At the November 17, 2025 status conference, the Court focused on preserving oral
23 testimony because of the risk of memories fading and directed the parties to meet and confer on
24 that issue. The City has cooperated with Plaintiffs on a plan for depositions. But as the City heard
25 the Court, the purpose of these depositions is preserving firefighters' memories while the Court
26 considers the pending demurrers. *See, e.g.*, Rough Transcript at 3:23-25 (“my concern . . . is the
27 dimming of memories”), 56:24-25 (“I want to focus on preserving recollections and memories”).
28 Document discovery at this stage would (a) delay any depositions, which is at odds with the idea

1 of preserving testimony, and (b) is not necessary to take depositions to preserve memory,
2 particular where the deposition testimony is focused on events during an approximately three day
3 period.

4 The speculative possibility that a document might refresh a deponent's recollection does
5 not justify Plaintiffs' sweeping document requests. For one thing, Plaintiffs already have
6 documents obtained through the CPRA process, and apparently through other sources that they
7 can use for this purpose. It also bears repeating that, as the Plaintiffs and the Court appeared to
8 recognize at the last status conference, the discovery Plaintiffs seek relates solely to their claims
9 against the State, not the City. With respect to the Lachman Fire, the City is effectively a third-
10 party. No claim against the City relates to the Lachman Fire response; and as the City has
11 previously noted, there is no plausible *legal* claim that could arise because of long-established
12 firefighting immunities in California. There is no good reason to burden the City and taxpayers
13 with broad discovery intended to support claims against a third party, merely on the possibility
14 that a document might refresh someone's memory.

15 The Court should decline to allow the document or written discovery at this time.

16 **C. Plaintiffs' Request for Discovery to State**

17 At the November 17, 2025 status conference, Plaintiffs also requested limited discovery
18 against the State. Specifically, Plaintiffs requested that the State produce an unredacted version of
19 its Incident Detail Report, dated January 1, 2025 relating to the Lachman Fire. The Court will
20 recall that the State produced a single page, almost entirely redacted, of this report in response to
21 CPRA requests for documents relating to CA State Parks' response to the Lachman Fire. The
22 State claimed that only this single highly redacted page was responsive to the Plaintiffs' request,
23 despite evidence that CA State Park "environmental scientists" were present at the Lachman Fire
24 on January 1 and January 2 and were photographed interacting with LAFD firefighters during
25 mop up operations of the fire. At the November 17th status conference, this Court ordered that
26 Parveen H. Kasraee, Senior Staff Counsel for CA State Parks, appear at the November 25th status
27 conference to answer questions why she redacted this Incident Detail Report.

28 ///

1 Immediately following the status conference on November 17th, Plaintiffs' Liaison Counsel
2 emailed Ken Lake, Deputy Attorney General, renewing Plaintiffs' request for an unredacted copy
3 of the Incident Detail Report and any communications CA State Parks had with LAFD on the
4 Lachman Fire. On Tuesday, November 18th, Plaintiffs' Liaison Counsel emailed Ken Lake the list
5 of 11 items listed below in advance of the parties' scheduled meet and confer Zoom meeting the
6 following day:

7 **LIST OF WITNESSES AND DOCUMENTS REQUESTED FROM CA STATE PARKS**

8 1. Identify all employees of the State of California, including CA State Parks, who
9 responded to the Lachman Fire on January 1, 2025 and provide available dates for their
depositions;

10 2. Identify all employees of the State of California, including CA State Parks, who were
11 present in the area of the Lachman Fire burn scar on January 2, 2025, and provide available dates
for their depositions:

12 3. Produce all communications (including text messages, emails, instant messaging
13 platforms, or other written communication mediums) relating to the Lachman Fire for each
employee who responded to the Lachman Fire, and were involved in the mop up of that fire
14 between January 1 – January 7, 2025.

15 4. Identify CA State Parks' Area Representative (AREP) and Resource Advisor (READ)
assigned to the Lachman Fire between January 1 – January 7, 2025.

16 5. Produce all documents, including ICS 213 notes, taken by any CA State Parks Agency
17 Representative (AREP) or Resource Advisor (READ) relating to the Lachman Fire between
January 1, - January 7, 2025, Please also identify the CA State Parks representative shown in the
18 attached photo taken on January 1, 2025 at 2:43 p.m. on the Lachman burn scar.

19 6. Produce all communications with any representative of LAFD concerning the Lachman
Fire between January 1 – January 7, 2025.

20 7. Produce all documents, including the Incident Action Plan (IAP) and Incident
21 Management Team Liaison Officer notes, for the Lachman Fire which identifies any
representative from CA State Parks at the Lachman Fire between January 1 – 7. 2025.

22 8. Produce the unredacted Incident Detail Report for Incident #250101S-0002 for the
23 January 1, 2025 Lachman Fire.

24 9. Produce the complete DPR Operations Manual — Natural Resources” that was in effect
from January 1, 2025 through January 7, 2025.

25 10. Produce the complete "DOM Chapter 1100, Visitor Safety" that is referenced in
26 Section 0313.2.1.3 of the DPR Operations Manual — Natural Resources which states "Closure of
Fire-Damaged Areas: All or a portion of a park unit may be closed when an unwanted wildland
27 fire is threatening or burns on Department lands (see DOM Chapter 1100, Visitor Safety). Areas
of a park unit which have burned will remain closed until appropriate Department staff have
inspected the area and rectified any public safety, property or resource protection issues.”
28

1 11. Produce all DPR 385, Public Safety Reports, including DPR 385A, Public Safety
2 Report Supplemental – Natural Hazards, Wildfires referenced in Section 0313.2.1.4 of the DPR
Operations Manual — Natural Resources.

3 In addition to this list, Plaintiffs' Liaison Counsel also emailed Mr. Lake a copy of the
4 photograph below, taken by one of the Plaintiffs, which clearly depicts a person dressed in a CA
5 State Parks' sweatshirt meeting with LAFD firefighters on the Lachman Fire burn scar. Metadata
6 for this photograph indicates the photo was taken on January 1, 2025 at 2:43 p.m. Liaison Counsel
7 produced this photograph to Mr. Lake because he had stated on the record at the November 17th
8 status conference that a report that a CA State Parks employee had told LAFD firefighters they
9 were not allowed to use a bulldozer or dig around certain protected species of plants was
10 "ludicrous". Liaison Counsel has asked Mr. Lake to identify the CA State Parks employee shown
in this photograph and produce him/her for deposition but Mr. Lake has refused.



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23 On Wednesday, November 19th, Plaintiffs' Liaison Counsel attempted to meet and confer
24 with counsel with Mr. Lake concernign these 11 requests. To say that this meet and confer was a
25 waste of time is an understatement. First, rather than conferring over the list of eleven (11) items
26 which were emailed to Mr. Lake the day before, Mr. Lake instead insisted on referring to the list
27 of CPRA requests referenced in the November 17th Joint Status Conference Report. Plaintiffs'
28 Liaison Counsel told Mr. Lake that they had heeded the Court's comments at the last hearing and

1 sent him a narrowed list of discovery requests. However, despite Liaison Counsels' repeated
2 requests, Mr. Lake refused to meet and confer on the Plaintiffs revised list of requested discovery
3 and instead insisted on responding to the Plaintiffs much broader CPRA requests.

4 When we asked if the State would identify the CA State Park's representative(s) who was
5 present during the mop up of the Lachman Fire on January 1st and 2nd, provide copies of any
6 reports they prepared, or even identify the Park employee in the photograph sent him, Me. Lake's
7 response was, "We're working on it" and "We have to talk to ATF about it." When asked why the
8 State would need to obtain permission from the ATF to provide the requested information, Mr.
9 Lake indicated that the ATF has requested the State not produce any of the information requested
10 by the Plaintiffs. When Mr. Lake was asked by Liaison Counsel to identify the person at ATF who
11 had made this request, Mr. Lake refused and in fact later admitted that he had not had any direct
12 communications with anyone at ATF.

13 When Liaison Counsel reminded Mr. Lake that Judge Jessner said she wanted memories
14 preserved now rather than waiting until after the demurrer hearing, Mr. Lake claimed he had no
15 recollection of the judge saying that and that he opposed any State Park employee being deposed
16 at this time. Since Mr. Lake was questioning what the Court said at the hearing, Liaison Counsel
17 confirmed with counsel for the City during their meet and confer on November 20, 2025, what the
18 Court said and it was consistent with what Liaison Counsel reported to Mr. Lake – i.e., that
19 Judge Jessner wanted the parties (including the State) to meet and confer to identify a narrow list
20 of witnesses present between January 1 and 7, 2025, to be deposed. Liaison Counsel sent Mr. Lake
21 a follow-up email on November 20, 2025 making him aware that counsel for the City confirmed
22 the Court's charge to the parties and requesting that the State change its position and cooperate.
23 Mr. Lake did not respond.

24 At the end of this meet and confer last Wednesday, Mr. Lake indicated that he would get
25 Liaison Counsel the State's formal response to the Plaintiffs' requests by 10:00 a.m. on Monday,
26 November 24th, or two hours before the deadline to file this Joint Report with the Court. The
27 entire purpose of this meet and confer was to try and resolve these disputes, not put off the State's
28 position until the eleventh hour before the Joint Report was due to be filed. Mr. Lake chose the

1 time for last Wednesday's meet and confer meeting and Plaintiffs expected him to have been
2 prepared to meaningfully participate rather than continue his mantra of "We're working on it."

3 The name(s) of the State Park employees who were present and interacted with the LAFD
4 firefighters during the mop up of the Lachman Fire are not privileged from disclosure under the
5 CPRA, much less the formal discovery that the Plaintiffs have requested the court order. The fact
6 that the Lachman Fire may under investigation by the ATF is not sufficient to withhold the
7 information Plaintiffs have requested in the narrowed 11 items. Further, the State's response to the
8 Plaintiffs' CPRA requests do not comply with Gov. Code § 7922.000, as it fails to set forth a
9 sufficient justification for nondisclosure. As such, there is no valid reason to refuse to produce the
10 information Plaintiffs have requested.

11 At 9:57 a.m. on Monday, November 24th (two hours before the Joint Report was due), Ken
12 Lake emailed that State's formal position listed below to Liaison Counsel. Additionally, at 9:09
13 a.m. that same day, Parveen Kasraee sent an email to Liaison Counsel producing hundreds of
14 records relating to the Lachman Fire. Given that this document dump occurred literally two hours
15 before this Joint Report was due, Liaison Counsel have not yet had the chance to review these
16 documents before filing this report. However, the State has produced an unredacted version of the
17 Incident Detail Report, which indicates that Park Ranger Sgt. Christy Araujo was dispatched to the
18 Lachman Fire on January 1st and that she prepared a written report and took photographs. At a
19 minimum, Plaintiffs wish to depose Sgt. Araujo and any other Park employee who responded to
20 the Lachman Fire, including the "environmenal scientist" depicted in the photo interacting with
21 LAFD firefighters on January 1st.

22 **D. State's Position:**

23 It is State Parks understanding that, at the status conference on November 17, 2025, the
24 court expressed concern regarding the lack of specificity as to State Parks' PRA responses to the
25 11 categories of documents raised by plaintiffs in the November 12, 2025, joint status report and
26 requested that the parties meet and confer regarding providing updates as to the status of the PRA
27 responses relating to each of the 11 categories. In this regard, State Parks has set forth below an
28 update as to the status of the PRA responses relative to each of the 11 categories. The updated

1 response to each category is in bold:

2 1 – Serve requests for production for communications (which will mean all text messages,
3 email communications, instant messaging platforms, or other written communication mediums):

4 a) concerning the January 1, 2025, fire (no referred to as the Lachman Fire in
5 Topanga State Park, which started on New Year's Eve/New Years Day on December 31,
6 2024/January 1, 2025), or the burn scar left behind from that fire, BEFORE the first report of the
7 Palisades fire around 10:30 am on January 7, 2025;

8 b) sent or received by State Parks employees email addresses between the dates of
9 January 1, 2025 and January 7, 2025 and regarding any of the following: a) Lachman fire; or b)
10 Topanga Canyon; or c) Pacific Palisades; or d) fire; or e) red flag warning;

11 c) sent or received by personnel for the State of California that went to the
12 Lachman Fire burn site at any time between January 1, 2025 and January 7, 2025; and

13 d) between the State Parks and LAFD, LAcFD, and/or VCFD concerning the
14 Lachman Fire.

15 **This refers to PRAs 25-230, 25-420, 25-501, and 25-701. State Parks is updating**
16 **these responses to include the release of documents that includes a complete, unredacted**
17 **copy of the Incident Detail Report and Report #250101S-0002-Offense/Incident Report**
18 **prepared by Sgt. Christy Araujo. Documents being released are in process at the time of**
19 **the submission of this report. Further specification as to the documents released can be**
20 **provided at the status conference.**

21 2 - Any documents that were in possession of State Parks, including but not limited to in
22 the possess of personnel at the Angeles District office, between January 1, 2025, and January 6,
23 2025 and that concern the Lachman Fire or the burn scar from it or the area burned by that fire.

24 **This refers to PRA 25-501. State Parks is updating this response to include the**
25 **release of documents that includes a complete, unredacted copy of the Incident Detail Report**
26 **and Report #250101S-0002-Offense/Incident Report prepared by Sgt. Christy Araujo.**
27 **Documents being released are in process at the time of the submission of this report.**
28 **Further specification as to the documents released can be provided at the status conference.**

1 3 - Training manuals or other educational materials relevant to Topanga State Parks staff
2 concerning wildfire procedures, both prevention and aftermath.

3 **This refers to PRA 25-420. State Parks released the responsive documents on**
4 **11/14/25.**

5 4. An organizational chart for Topanga State Parks.

6 **This refers to PRA 25-420. State Parks released the responsive document on 11/14/25.**

7 5. List of staff on duty from January 1 through January 7, 2025 for Topanga State
8 Park.

9 **This refers to PRA 25-420. There is no specific document that lists all staff on duty**
10 **from January 1 through January 7, 2025 for Topanga State Park. States Parks is updating**
11 **the PRA response to include Angeles District, Topanga Sector, peace officer schedules.**

12 6. The entirety of the State Parks Department Operations Manual (DOM) that was in effect
13 at the time of the Lachman Fire on January 1, 2025.

14 **This refers to PRA 25-704. State Parks released the responsive documents on**
15 **10/17/25.**

16 7. "DOM Chapter 1100, Visitor Safety" referenced in § 0313.2.1.3 of State Parks' DPR
17 Operations Manual.

18 **This refers to PRA 25-704. State Parks released the responsive documents on**
19 **10/17/25.**

20 8. Any agreements with Mountain Recreation & Conservation Authority (MRCA) or Santa
21 Monica Mountain Conservancy (SMMC) concerning the trail near Skull Rock in Topanga State
22 Park.

23 **This refers to PRA 25-420. State Parks released the responsive documents on**
24 **11/14/25.**

25 9. Any agreements between the State or State Parks and the Los Angeles City Fire
26 Department (LAFD) for LAFD to provide fire protection, fire suppression and/or respond to
27 wildland fires in Topanga State Park that were in effect at the time the LACHMAN FIRE occurred
28 on January 1, 2025.

1 **There were no specific agreements between the State or State Parks and the Los**
2 **Angeles City Fire Department (LAFD) for LAFD to provide fire protection, fire suppression**
3 **and/or respond to wildland fires in Topanga State Park that were in effect at the time the**
4 **LACHMAN FIRE occurred on January 1, 2025. Therefore, the PRA response has been or**
5 **will be updated soon to indicate that there are no responsive documents to this request.**

6 10. Any agreements between the State or State Parks and the Los Angeles County Fire
7 Department (LAcFD) for LAcFD to provide fire protection, fire suppression and/or respond to
8 wildland fires in Topanga State Park that were in effect at the time the LACHMAN FIRE occurred
9 on January 1, 2025.

10 **There were no specific agreements between the State or State Parks and the Los**
11 **Angeles County Fire Department (LAcFD) for LAcFD to provide fire protection, fire**
12 **suppression and/or respond to wildland fires in Topanga State Park that were in effect at the**
13 **time the LACHMAN FIRE occurred on January 1, 2025. Therefore, the PRA response has**
14 **been or will be updated soon to indicate that there are no responsive documents to this**
15 **request.**

16 11. Any agreements between the State or State Parks and the Ventura County Fire
17 Department (VCFD) for VCFD to provide fire protection, fire suppression and/or respond to
18 wildland fires in Topanga State Park that were in effect at the time the LACHMAN FIRE occurred
19 on January 1, 2025.

20 **There were no specific agreements between the State or State Parks and the Ventura**
21 **County Fire Department (VCFD) for VCFD to provide fire protection, fire suppression**
22 **and/or respond to wildland fires in Topanga State Park that were in effect at the time the**
23 **LACHMAN FIRE occurred on January 1, 2025. Therefore, the PRA response has been or**
24 **will be updated soon to indicate that there are no responsive documents to this request.**

25 In addition, in the meet and confer conversation with plaintiffs' counsel, they requested a
26 list of names on site from January 1 through 6. It is the State's understanding that the court did
27 not authorize plaintiffs to add an additional discovery request category beyond addressing the
28 release of documents relative to the PRA requests. In this regard, the State requested a copy of the

1 transcript from the November 17, 2025, status conference that would provide clarification as to the
2 parameters of what plaintiffs and the State were to meet and confer on. However, it appears that
3 the transcript will not be available before the status conference on November 25, 2025.

4 The State has not had an opportunity to respond to Plaintiffs' Request for Discovery to
5 State in the joint report as this was first emailed to counsel for the State at 11:42 a.m. on
6 November 24 and the joint report is due to be filed at 12:00 p.m. The State requests an
7 opportunity to respond at the status conference.

8 Dated: November 24, 2025

ROBERTSON & ASSOCIATES, LLP

9
10 By: 

Alexander Robertson, IV

11
12 Dated: November 24, 2025

FOLEY BEZEK BEHLE & CURTIS, LLP

13
14 
15 By: _____

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19 By: 

Kevin R. Boyle
Matthew J. Stumpf

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21 Dated: November 24, 2025

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22
23 By: 

Peter McNulty
E. Kirk Wood

Liaison Counsel for Individual Plaintiffs

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27 ///

28 ///

1 Dated: November 24, 2025

MUNGER, TOLLES & OLSON LLP

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/ s / Daniel B. Levin
By: _____

4

Brad D. Brian
Daniel B. Levin
Nicholas D. Fram

5

6

*Attorneys for Defendant City of Los Angeles
Acting By and Through the Los Angeles
Department of Water and Power*

7

8 Dated: November 24, 2025

STATE OF CALIFORNIA DEPARTMENT OF
JUSTICE

9

10

/ s / Kenneth G. Lake
By: _____

11

Kenneth G. Lake

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*Attorneys for Defendant State of California
acting by and through the State of California
Department of Parks and Recreation (also
erroneously sued herein as California
Department of Parks and Recreation)*

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ELECTRONIC PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles; I am over the age of eighteen years and not a party to the within entitled action; my business address is 32121 Lindero Canyon Road, Suite 200, Westlake Village, CA 91361.

Today, I caused to be served the within document(s) described as **JOINT STATUS CONFERENCE REPORT** on the interested parties in this action pursuant to the most recent Omnibus Service List by submitting an electronic version of the document(s) by file transfer protocol (FTP) to CASEANYWHERE through the upload feature at www.caseanywhere.com.

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

Executed on November 24, 2025, at Westlake Village, California.



Ann Russo