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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.

Lead Case No. 25STCV00832

JOINT STATUS CONFERENCE REPORT

Date: December 15, 2025
Time: 2:30 p.m.
Dept.: 7

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

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

AND ALL RELATED CASES

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8 **STATE OF CALIFORNIA DEPARTMENT OF JUSTICE**

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

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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”), hereby submit this Joint Status Conference Report
4 in advance of the December 15, 2025, status conference in the above-entitled action.

5 At the November 25, 2025, status conference, the Court ordered the City and State to
6 produce documents responsive to Plaintiffs’ discovery requests, as narrowed by the Court, in
7 connection with depositions Plaintiffs will take of twelve Los Angeles Fire Department (“LAFD”)
8 personnel and five State Parks personnel. *See* Order re Limited Discovery, at 3, 5-6 (Dec. 1,
9 2025).

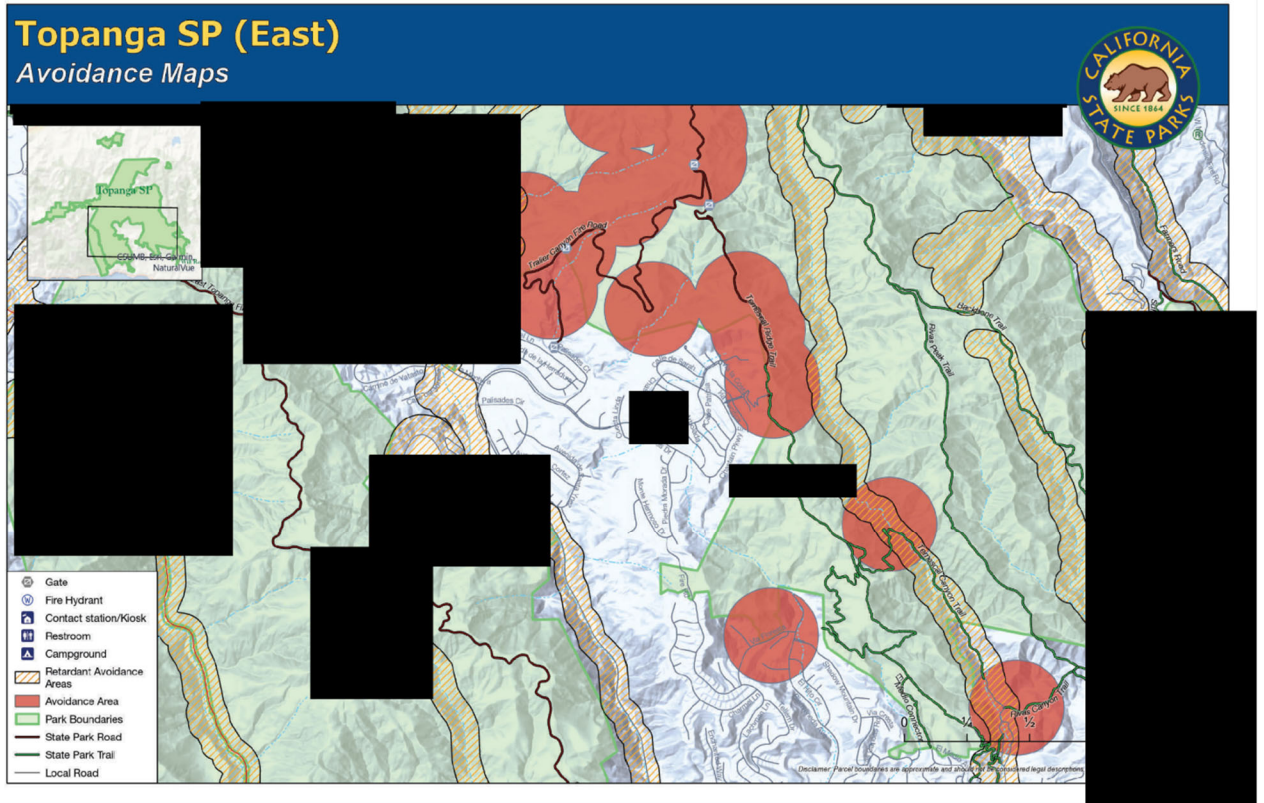
10 In the period since the Court’s order, Plaintiffs, the City, and State have worked
11 cooperatively on the document productions and depositions that are the subject of the order. The
12 City made a production of documents responsive to the order on December 5, 2025, and the State
13 made a such a production on December 9, 2025. The City and State are continuing to collect,
14 review, and produce other documents, including emails and text messages, and anticipate making
15 additional productions in the near future.

16 To date, the parties have arranged a total of 10 depositions of City or State employees.
17 Those depositions are scheduled to occur between December 11, 2025, and December 22, 2025.
18 The parties anticipate that remaining depositions covered by the order should be completed in
19 January 2026.

20 **Plaintiffs' Position Re: State's Production of Documents:**

21 Contrary to the Court's order, the State produced maps and text messages which were
22 heavily redacted. Specifically, the State redacted its "Avoidance Maps", which identify areas
23 within the Lachman Fire burn scar which allegedly contain protected plant species and/or
24 archeological resources. As the Court will recall, the entire purpose of the Plaintiffs' requesting
25 these maps was to investigate whether State Parks directed firefighters to refrain from fire
26 suppression and/or mop up of the Lachman Fire in these Avoidance Areas, which could have
27 caused smoldering embers to remain on State land which later ignited into the Palisades Fire.
28 These maps and text messages between State Park employees on the night of the Lachman Fire are

critical for the depositions of the State Park employees, which are scheduled to begin on December 11, 2025. Below is an example of one of the heavily redacted Avoidance Maps produced by the State.



Below is a copy of just one of the redacted text messages from Noa Rishe, who is the Senior Environmental Scientist employed by State Parks, which appears to have redacted the location of the Astragalus plant located within the Lachman Fire burn scar.

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To: Noa Rishe

iMessage
Wed, Jan 1 at 2:03 AM

Hi Christy, are you at the fire?

I will be. I'm getting ready now.

There is federally endangered astragalus along temescal fire road. Would be nice to avoid cutting it if possible. Do you have avoidance maps? I have a couple of READs on standby. I'll wait to deploy them until you get on scene and assess the situation

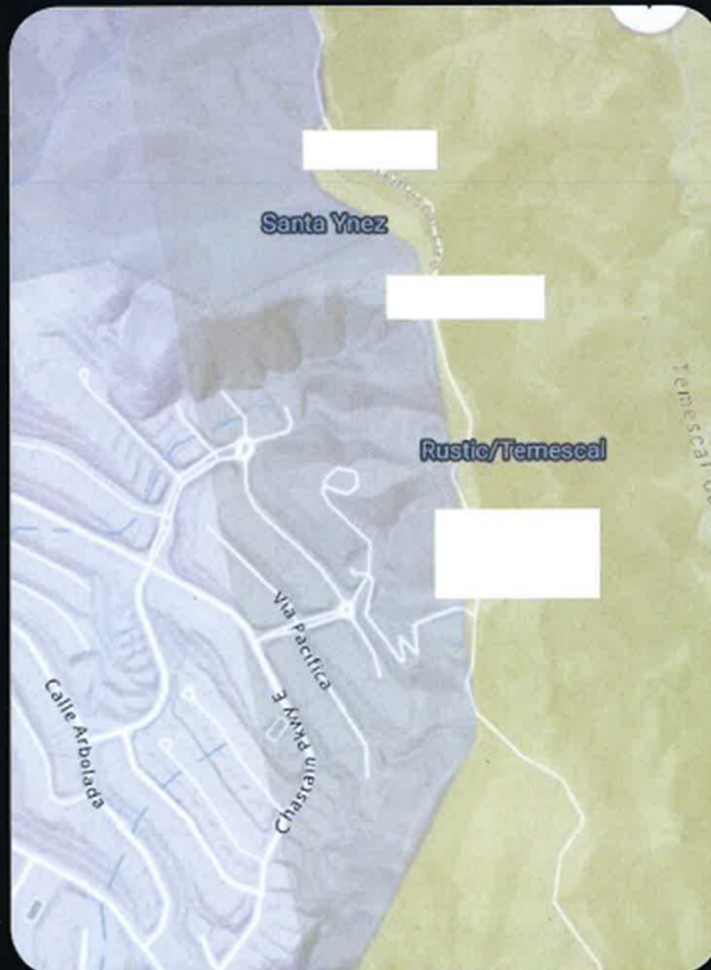
Definitely will want to send them down if heavy equipment arrives

Ok. I'll let you know.

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Definitely will want to send
them down if heavy
equipment arrives

Ok. I'll let you know.



Federally endangered plant
populations in blue

1 The State claims that "statutes prohibit disclosure of records concerning archeological and
2 other natural resources." In support of its position, the State cites *Clover Valley Foundation v. City*
3 *of Rocklin* (2011) 197 Cal.App.4th 200, 220. However, this case dealt with a challenge to a city's
4 approval of an environmental impact report (EIR). The court held that the Public Records Act and
5 the California Environmental Quality Act (CEQA) Guidelines prohibited a city from disclosing
6 records and information concerning a subdivision project site's Native American archeological
7 resources in the project's EIR. Here, the State was required to produce the Avoidance Maps and
8 text messages pursuant to this Court's order and not a CPRA or other public request. The State has
9 redacted the descriptions of the Avoidance Areas on its maps, so it's impossible to tell whether the
10 shaded areas include protected plant species or archeological artifacts, or even to see the
11 boundaries of the avoidance areas.

12 From the text messages produced by the State, it appears that State Park "resource
13 advisors" were concerned about firefighters damaging a plant called "Astragalus" during the
14 Lachman Fire. There is no legal reason why the location and description of a plant species should
15 be redacted from the State's court-ordered production and Plaintiffs request that this Court order
16 the State to produce non-redacted version of the Avoidance Maps and text messages immediately.

17 **State's Position Re: State's Production of Documents:**

18 The State disagrees with plaintiffs' characterization of the document production which also
19 contains mistatements as to redactions. In this regard, plaintiffs' counsel will have an opportunity
20 to question the State Parks witnesses regarding these documents in the upcoming depositions.

21 ///

22 Respectfully submitted,

23 Dated: December 10, 2025

ROBERTSON & ASSOCIATES, LLP

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26 By: 

Alexander Robertson, IV

1 Dated: December 10, 2025

FOLEY BEZEK BEHLE & CURTIS, LLP

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By: _____

Roger N. Behle, Jr.
Robert A. Curtis

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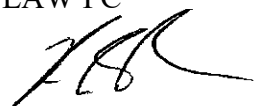
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Dated: December 10, 2025

BOYLE LAW PC

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Kevin R. Boyle
Matthew J. Stumpf

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Dated: December 10, 2025

MCNULTY LAW FIRM
WOOD LAW FIRM

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By: _____

Peter McNulty
E. Kirk Wood

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Liaison Counsel for Individual Plaintiffs

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Dated: December 10, 2025

MUNGER, TOLLES & OLSON LLP

18

/ s / Daniel B. Levin

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By: _____

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

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

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Dated: December 10, 2025

STATE OF CALIFORNIA DEPARTMENT OF JUSTICE

/ s / Kenneth G. Lake

By: _____
Kenneth G. Lake

*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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Los Angeles Superior Court, Case No. 25STCV00832

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 350 South Grand Avenue, Fiftieth Floor, Los Angeles, CA 90071.

On December 10, 2025, I served true copies of the following document(s) described as

JOINT STATUS CONFERENCE REPORT

on the interested parties in this action as follows:

☒ **BY ELECTRONIC TRANSMISSION:** I caused service of such document(s) through the CaseAnywhere system. Upon completion of said transmission of said document(s), a certified receipt is issued to filing party acknowledging receipt by CaseAnywhere's system. Once CaseAnywhere has served all designated recipients, proof of electronic service is returned to the filing party.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on December 10, 2025, at Los Angeles, California.

/s/Julie Mardorf

Julie Mardorf