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Liaison Counsel for Individual Plaintiffs

FILED
 Superior Court of California
 County of Los Angeles
 08/11/2026
 David W. Slayton, Executive Officer / Clerk of Court
 By: A. Morales Deputy

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Liaison Counsel for Public Entity Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

PALISADES FIRE LITIGATION

Lead Case No. 25STCV00832

DAN GRIGSBY, et al.,
 Plaintiff,
 vs.

**STIPULATION AND [PROPOSED]
 ORDER FOR EXTRACTION AND
 PRESERVATION OF INFORMATION
 FROM PERSONAL CELL PHONES OF
 CERTAIN STATE PARK EMPLOYEES**

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

Assigned for All Purposes to:
 Hon. Samantha Jessner, Dept 7
 Revised Master Complaint Filed:
 December 1, 2025

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Defendants.
AND ALL RELATED CASES

Liaison Counsel for Individual Plaintiffs, Subrogation Plaintiffs and Public Entity Plaintiffs (collectively "Plaintiffs") and counsel for Defendant State of California, acting by and through the State of California Department of Parks and Recreation (collectively the "State") hereby stipulate as follows:

WHEREAS, Liaison Counsel for the Individual Plaintiffs assert repeat and serial violations by the State of the Court's Prior Discovery Orders. The State contends that it has complied with the Court's Prior Discovery Orders. These issues were addressed in an Informal Discovery Conference ("IDC") which was held on May 20, 2026, in chambers; and

WHEREAS, as a result of that IDC, the parties met and conferred regarding the Plaintiffs' request to extract, preserve and produce text messages relating to the Lachman Fire and burn scar from all mobile devices, whether personal or State issued cell phones, of certain State employees; and

WHEREAS, the parties have stipulated that the Plaintiffs will retain Bruce W. Pixley of Pixley Forensics Group as an independent forensic examiner, who shall conduct a forensic collection of messages from the personal cell phones of State Parks employees Noa Rishe, John Ota and Michael Moss, and former State Parks employee Maegan Ealy, process the messages (including attachments) into daily conversations and apply mutually agreed-upon search criteria, and export potentially responsive conversations for review in Relativity Short Message Format (RSMF) which discuss, depict, mention or refer to the Lachman Fire, the Lachman burn scar, and any references thereto, including without limitation any communications or data concerning smoldering, smoke, flames, fire, embers, heat, hot spots, smoldering roots, ash pits, rekindling, reignition, holdover conditions, flare-ups, or any indication that the fire was not fully extinguished or remained active in whole or in part within the Lachman burn scar or surrounding area. This includes references to residual heat, underground or subsurface burning, ash, visible smoke, odors of smoke, glowing or heat sources, and any observations, reports, or concerns regarding potential or actual reignition, flare-ups, or continued burning conditions. This further includes any communications reflecting monitoring, inspection, patrol, or evaluation of the Lachman Fire area,

1 as well as any statements indicating the fire was “out,” “not out,” “contained,” “not contained,”
2 “under control,” or “not fully extinguished,” including any concerns, warnings, or discussions
3 regarding the potential for reignition or fire spread.

4 The search shall include the recovery and review of any responsive deleted, archived, or
5 otherwise unavailable communications or data, including without limitation text messages,
6 iMessages, or other messaging platform communications, sent or received by the identified
7 employees at any time between January 1, 2025 and the present.

8 WHEREAS, the extracted data shall be first provided to the State for review for privilege,
9 privacy, and confidentiality, and any material claimed to be privileged, confidential, or protected
10 work product shall be logged in a privilege log. All material not withheld or redacted on the basis
11 of privilege, privacy, confidentiality or work product protection, and any privilege log, shall be
12 produced by the State to the Plaintiffs within fourteen (14) days after the State's receipt of the
13 potentially responsive materials from the forensic examiner.

14 WHEREAS, the independent forensic examiner shall disclose the search terms to be
15 mutually agreed upon by the Plaintiffs and State; and

16 WHEREAS, the independent forensic examiner shall maintain a chain of custody of the
17 extracted data and any missing data identified;

18 WHEREAS, the extraction shall take place within 30 days of this Order being executed; and

19 WHEREAS, the Parties respectfully request the Court to accept this joint stipulation and
20 enter its terms as an Order.

21 Dated: August 5, 2026

ROBERTSON & ASSOCIATES, LLP

22 By:



23 Alexander Robertson, IV

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1 Dated: August 5, 2026

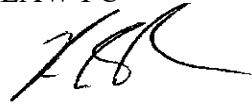
FOLEY BEZEK BEHLE & CURTIS, LLP



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Roger N. Behle, Jr.
Robert A. Curtis

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5 Dated: August 5, 2026

BOYLE LAW PC



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Kevin R. Boyle
Matthew J. Stumpf

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9 Dated: August 5, 2026

MCNULTY LAW FIRM
WOOD LAW FIRM



By: _____
Peter McNulty
E. Kirk Wood

Liaison Counsel for Individual Plaintiffs

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16 Dated: August 5, 2026

COZEN O'CONNOR



By: _____
Howard D. Maycon
David D. Brisco

Proposed Liaison Counsel for Subrogation Plaintiffs

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21 Dated: August 5, 2026

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By: _____
Christopher Tayback
Jeffrey N. Boozell
Crystal Nix-Hines

Proposed Liaison Counsel for Public Entity Plaintiffs

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Dated: August 5, 2026

STATE OF CALIFORNIA DEPARTMENT OF
JUSTICE

By: 

Tammy Kim

*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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[PROPOSED] ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: 08/11/2026



A handwritten signature in black ink, appearing to read "Samantha Jessner", is written over a horizontal line.

Samantha Jessner / Judge

Hon. Samantha Jessner
Judge of the Superior Court