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

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.,

JOINT STATUS CONFERENCE REPORT

Plaintiff,

Date: November 17, 2025
Time: 1:45 p.m.

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vs.

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

Defendants.

AND ALL RELATED CASES

Dept.: 7

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

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

Individual Plaintiffs and Defendants, the City of Los Angeles Acting By and Through the Department of Water and Power (“City”), and the State of California, including California Department of Parks and Recreation, (“State”), do hereby submit this Joint Status Conference Report in advance of the November 17, 2025 status conference in the above-entitled action.

A. **Plaintiffs Request Limited Discovery Against the State of California, California Department of Parks and Recreation, City of Los Angeles, and Third Parties**

1. **Plaintiffs’ Position:**

Plaintiffs request is made with urgency based upon alarming new evidence that LAFD firefighters were ordered to roll up their hoses and leave the Lachman Fire burn scar on January 2nd while the fire still smoldered. The ATF has concluded that the Palisades Fire was a "holdover" fire caused by smoldering embers from the Lachman Fire days earlier. This evidence directly contradicts the LAFD Fire Chief's statements that the smoldering embers were "undetectable" and that his firefighters remained on site for 36 hours to make sure the fire was fully extinguished. However, according to the L.A. Times, "firefighters mopping up a small brush fire that authorities say reignited as the Palisades Fire five days later were ordered to leave the original burn scene even though they complained the ground was still smoldering and rocks remained hot to the touch, according to firefighter text messages reviewed by The Times." In light of this revelation, LAFD Chief Officers and Captains sent a letter to Mayor Bass on November 1st stating they have "no faith in Chief Villanueva to conduct an accurate, comprehensive and impartial investigation and report related to the Lachman Fire." Mayor Bass has called for an investigation. Federal prosecutors have issued grand jury subpoenas for these firefighters' text messages.

1 Plaintiffs' Master Complaint alleges that the smoldering embers from the Lachman Fire
2 constituted a dangerous condition of public property which caused the Plaintiffs' injuries, deaths
3 and property damage. It is critical to the Plaintiffs' case that they be given the same access to this
4 important evidence as the media and federal prosecutors have so they may preserve this evidence
5 before memories fade and potential spoilation of evidence occurs.

6 The California Public Records Act (CPRA) has been proven not to be an alternative
7 mechanism that will work here.

8 **Summary of News:** Plaintiffs Master Complaint was due for filing on October 8, 2025.
9 That morning, the United States Department of Justice ("DOJ") in conjunction with the ATF and
10 City of Los Angeles entities, held a morning press conference, inviting countless news
11 organizations the day before. It was national headline news. The DOJ announced the arrest of an
12 alleged arsonist for the January 1st fire (Lachman Fire) and publicly stated that he alone is
13 responsible for the Palisades Fire. During the press conference, the ATF officials stated that the
14 Palisades Fire was a "holdover" fire that rekindled from the January 1st Lachman Fire, and that
15 the embers from the Lachman Fire were "undetectable." That same day, Governor Gavin
16 Newsom issued a statement that the DOJ news uncovered "how the horrific Palisades Fire began"
17 and that "[t]his tragedy will never be forgotten...there must be accountability."

18 <https://www.gov.ca.gov/2025/10/08/governor-newsom-statement-on-palisades-fire-arrest/>

19 The day after, on October 9, 2025, the City of Los Angeles endorsed these statements. The
20 Los Angeles Fire Department ("LAFD") Interim Fire Chief Ronnie Villanueva issued a public
21 statement that included, "[t]he January 7 fire was not a rekindle or due to failed suppression but
22 the reactivation of an undetectable holdover fire under extraordinary wind conditions."

23 [https://lafd.org/news/january-2025-palisades-fire-suspect-arrest-statement-and-lafd-afteraction-](https://lafd.org/news/january-2025-palisades-fire-suspect-arrest-statement-and-lafd-afteraction-review-report)
24 [review-report](https://lafd.org/news/january-2025-palisades-fire-suspect-arrest-statement-and-lafd-afteraction-review-report). The statement was made at the same time that the LAFD publicly released LAFD

25 Palisades Fire After-Action Review Report and other documents. For weeks, the public was
26 misled to believe that the Lachman burn scar had "undetectable" smoldering embers.

27 However, by October 26, 2025, evidence began emerging that directly contradicts the
28 government's version of what happened. Specifically, a video taken on January 2nd by a hiker of

1 the Lachman burn scar clearly shows the ground visibly smoldering. This video was the subject of
2 an L.A. Times article '*It's still smoldering.*' *A hiker's video of Palisades fire raises questions*
3 *about State's Responsibility.* [https://www.latimes.com/california/story/2025-10-26/could-the-](https://www.latimes.com/california/story/2025-10-26/could-the-state-have-done-more-to-prevent-the-palisades-fire)
4 [state-have-done-more-to-prevent-the-palisades-fire.](https://www.latimes.com/california/story/2025-10-26/could-the-state-have-done-more-to-prevent-the-palisades-fire)

5 Then on October 30th, the L.A. Times published another article stating that LAFD
6 firefighters alerted their battalion chief that areas of the Lachman Fire burn scar were still
7 smoldering on January 2nd, but they were ordered to leave anyway leaving the ground still
8 smoldering and rocks hot to the touch. *Days before Palisades inferno, firefighters were ordered to*
9 *leave smoldering burn site.* [https://www.latimes.com/california/story/2025-10-30/firefighters-](https://www.latimes.com/california/story/2025-10-30/firefighters-ordered-to-leave-smoldering-palisades-burn-site)
10 [ordered-to-leave-smoldering-palisades-burn-site.](https://www.latimes.com/california/story/2025-10-30/firefighters-ordered-to-leave-smoldering-palisades-burn-site) The next day, Mayor Karen Bass called for the
11 LAFD to "thoroughly investigate this week's report regarding the Lachman Fire."

12 Then on November 5, 2025, an anonymous letter purportedly authored by LAFD Chief
13 Officers and Captains with over 250 years of combined experience was sent to Mayor Karen Bass
14 and L.A. City Councilmembers. The letter states, "We have no faith in Chief Villanueva to
15 conduct an accurate, comprehensive and impartial investigation and report relating to the Lachman
16 Fire." The letter demanded an investigation be conducted by the Grand Jury and a blue-ribbon
17 panel made up of subject matter experts in wildland firefighting.
18 [https://www.nbclosangeles.com/investigations/anonymous-letter-demands-independent-palisades-](https://www.nbclosangeles.com/investigations/anonymous-letter-demands-independent-palisades-fire-investigations/3800442/)
19 [fire-investigations/3800442/.](https://www.nbclosangeles.com/investigations/anonymous-letter-demands-independent-palisades-fire-investigations/3800442/) The letter indicated that members within the LAFD did not trust the
20 LAFD or the City to conduct an unbiased investigation into the Lachman Fire or the Palisades
21 Fire.

22 Further, Plaintiffs have discovered that a resident called 911 on January 3rd and reported
23 seeing smoke coming from the Lachman burn scar in the area where the ATF says that fire
24 rekindled into the Palisades Fire on January 7th. The official explanation that the smoldering
25 embers remained "undetected" and "deep underground within the root system of dense vegetation"
26 is contradicted by this new evidence disclosed in the media. Unfortunately, Plaintiffs have been
27 hamstrung by the current stay on discovery and are unable to conduct limited discovery to
28 determine the credibility of this newly reported evidence.

1 On November 5, 2025, the L.A. Times reported that the LAFD text messages have been
2 subpoenaed by a federal grand jury. [https://www.latimes.com/california/story/2025-11-05/federal-](https://www.latimes.com/california/story/2025-11-05/federal-prosecutors-subpoena-lafd-firefighter-text-messages)
3 [prosecutors-subpoena-lafd-firefighter-text-messages](https://www.latimes.com/california/story/2025-11-05/federal-prosecutors-subpoena-lafd-firefighter-text-messages). Subpoenas from a Congressional
4 investigation committee have also reportedly been issued for these same text messages. It is
5 patently unfair that the victims who suffered unbelievable losses are prevented from obtaining this
6 same critical evidence because of the pending stay on discovery until next year.

7 **Request for LAFD and Third-Party Discovery:** Plaintiffs must be permitted to
8 immediately subpoena and obtain the LAFD text messages referenced in the L.A. Times article,
9 the LAFD investigative file that led to the questionable After Action Report, and depositions of
10 the dozen or so firefighters who were ordered to pack up and leave the smoldering Lachman Fire
11 burn scar on January 2nd. These documents are relevant to the cases against the City and the
12 State, and the victims' claims as a whole. The evidence is relevant to the plaintiffs' claim that a
13 dangerous condition of public property was created when smoldering embers were left
14 unextinguished on the Lachman Fire burn scar before Santa Ana winds rekindled those embers
15 into the Palisades Fire, which is more specifically articulated in the Master Complaint. The State
16 made clear during the meet and confer process that its demurrer will argue those issues and/or
17 blame the alleged arsonist while parroting the early false narrative that embers were
18 'undetectable.'

19 The victims (people and families who lost loved ones, their houses, practically all of their
20 personal property, and their community that they called 'home') have a fundamental right to
21 access to justice. The victims' fundamental right to seek justice is at risk given the discovery stay
22 combined with the severe lack of transparency of the government and investigative agencies.
23 How have text messages of LAFD firefighters expressing concerns that they were ordered to leave
24 smoldering embers at the burn site been kept secret from the public for 10 months? Have these
25 firefighters even had their recollections recorded yet? The victims *must* be privy to this evidence
26 now. The evidence not only is relevant to causes of action that the City and State want the Court
27 to dismiss on legal grounds, the evidence may shed light on additional claims against government
28 entities that have not yet been made. The clock is ticking and the victims are going to run out of

1 time - the 1 year statutory deadline to file mandatory pre-lawsuit government tort claims (as to real
2 property as well as apply for late claims subject to a 6-month statute) is fast approaching as is the
3 January 7, 2026 (2 months away) one-year anniversary of the Palisades Fire.

4 Time is of the essence as well to avoid spoliation. The victims have no faith that
5 appropriate measures are being taken to avoid the spoliation of evidence – nothing highlights that
6 more than the failure to preserve and disclose written evidence of the City’s knowledge of
7 smoldering embers at the Lachman burn site. What else has been destroyed by now? The Court
8 and victims must preserve the evidence. The longer that Plaintiffs are unable to engage in this
9 discovery the greater the risk of spoliation of evidence and manipulation of the truth. And the
10 more time that passes the greater likelihood of ‘forgetfulness’¹. Plaintiffs must be able to serve
11 discovery and issue subpoenas to obtain the LAFD text messages and depose those firefighters
12 who were allegedly ordered to abandon the mop up of the Lachman Fire. Indeed, text messages
13 may only be available from cell phone carriers for a finite period of time (should plaintiffs have to
14 subpoena carriers). Plaintiffs must be permitted to try to preserve this evidence by obtaining it
15 prior to the one-year anniversary.²

16 Plaintiffs seek a lifting of the discovery stay to specifically do the following discovery as
17 to the City of Los Angeles and Los Angeles Fire Department:

18 1 – Serve requests for production to the City and Subpoenas to the Los Angeles Fire
19 Department for all communications (which will mean all text messages, email communications,
20 instant messaging platforms, or other written communication mediums) for each of the LAFD
21 firefighters who responded to the Lachman Fire, and were involved in the mop-up of the burn site

22
23 ¹ KABC (channel 7) interviewed LAFD Deputy Chief Richard Fields recently, and when he was
24 asked about when LAFD did not pre-deploy firefighters to the Palisades he answered “Today, I
25 couldn't give you an exact answer as to why, you know, nine months removed. I don't have a
26 specific answer for that. Not to say there was not a specific reason.”
<https://abc7.com/amp/post/los-angeles-firefighter-who-planned-for-january-fires-says-plan-wasnt-enough/18091830/>

27 ² The City has already had issues with deleting text messages and communications as it relates to
28 the Palisades Fire - <https://www.latimes.com/california/story/2025-03-07/was-bass-incommunicado-while-returning-from-ghana-or-is-her-office-withholding-texts>

1 on January 1st through the reported ignition of the Palisades Fire on January 7th;

2 2 – Serve requests for production and subpoenas for all communications regarding the
3 Lachman fire, the burn site, Topanga State Park, or activities related to the Lachman ‘mop-up’
4 between the City and/or LAFD and any of the following: personnel from the State of California,
5 California Department of State Parks, or the County of Los Angeles Fire Department, for the time
6 period of December 31, 2024 to just before the ignition of the Palisades Fire on January 7, 2025;

7 3 – Serve requests for production and subpoenas for all radio communication recordings,
8 including but not limited to the LAFD’s Genesis system, from LAFD and the City from the
9 Lachman Fire and subsequent work at the burn scar that, to our understanding, are recorded and
10 preserved pursuant to custom and practice by the LAFD;

11 4 – Serve interrogatories to the City of Los Angeles and subpoenas to the LAFD for
12 immediate identification of the cell phone carriers and cell phone numbers for the department
13 issued phones for each of the LAFD firefighters who went to the Lachman fire and the burn scar
14 site so that the Plaintiffs may thereafter subpoena the cell phone carriers for call and text records
15 for January 1, 2025 at 12:01 am through January 7, 2025 at 10:25 a.m.

16 5 – Service interrogatories for the City of Los Angeles to respond on shortened notice by
17 November 30, 2025, with the identification of the LAFD firefighters who were at the Lachman
18 burn site between January 1, 2025 through January 7, 2025;.

19 6 – Serve deposition notices and subpoenas, if necessary, to set the depositions of the
20 LAFD firefighters if they have not yet been interviewed, confidentially deposed, or had their
21 recollections recorded by audio in a manner that is *not* subject to attorney-client privilege (i.e., if
22 the City of Los Angeles had an attorney record the recollection of the firefighters so that attorney-
23 client privilege may be asserted over the recording).

24 **Request for State of California Discovery:** Plaintiffs must also be permitted to
25 immediately serve discovery on the State of California and California Department of Parks and
26 Recreation (“State Parks”). During the meet and confer process with the State regarding the
27 Demurrer, the State made it clear that the lack of actual or constructive notice of the Lachman Fire
28 on State property will be a focal point of the State’s argument. The State also advised that it will

1 argue that the burn scar was an area that is a City/LAFD responsibility, not the State.

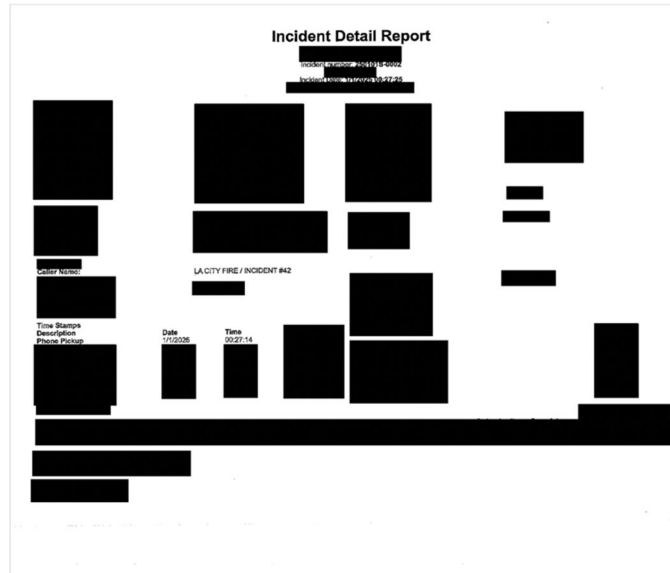
2 The Palisades Fire ignited on land owned by the State of California through the State
3 Parks. That is not in dispute. Since April (7 months ago), Plaintiffs' attorneys have been trying to
4 use the CPRA process to obtain public records from the State. Many of the requests seek
5 communications regarding the Lachman Fire, communications between the State and other
6 government entities, inspection of the burn scar between January 1st and 7th, and documents
7 about what precautions, if any, the State Parks took in light of the Red Flag Warning leading up to
8 January 7th. The CPRA requests also sought relevant operating procedures, training records, and
9 other evidence. Unfortunately, the CPRA process is not working. The State is simply not
10 producing this crucial information, despite producing documents in response to other less
11 important CPRA requests. It is clear that the State has access to this information. Very recently,
12 in an effort to divert responsibility away from itself to other public entities, the State sent to the
13 Los Angeles Times an operating agreement for the land at issue that plaintiffs have been seeking
14 through the CPRA for many months.

15 Plaintiffs' counsel could file a separate lawsuit against the State to compel production on
16 the CPRA requests. But that is inefficient and a waste of time where this Court already has
17 jurisdiction over the State and State Parks as parties in the Palisades Fire Litigation. The
18 discovery process would be a more streamlined and efficient way to get this information,
19 particularly as the State fears no consequences for simply refusing to make document production
20 under the CPRA.

21 The same issues of access to justice and spoliation of evidence that exist as to the City and
22 LAFD exist here as to the State. The evidence is clearly relevant to issues that will be the subject
23 of demurrer but also may be foundational to claims made (and perhaps not yet made) by the
24 victims. With these significant concerns, Plaintiffs' Liaison Counsel on November 4, 2025, sent a
25 letter to the State's counsel Kenneth Lake and to State Parks' attorney Parveen Kasraee detailing
26 the requests and delinquent responses. A copy of the letter sent to the State's and State Park's
27 attorneys is attached hereto as Exhibit B. The State's attorney in this case, Mr. Lake, Mr. Lake,
28 advised he is not handling the CPRA requests but another State attorney is, and the State will

1 oppose the Plaintiffs request for opening of limited discovery to allow the Plaintiffs to obtain the
2 public evidence sought in the CPRA requests.

3 To date, the State Parks has produced only a highly-redacted face page of its 'Incident
4 Detail Report,' for incident no. 25101S-002, related to when it first learned of the Lachman fire:



14 Plaintiffs request to that the Court order a limited lifting of the discovery stay to allow for
15 following discovery to the State and State Parks (this is nearly identical to the CPRA requests that
16 the State has not produce to with documents):

17 1 – Serve requests for production for communications (which will mean all text messages,
18 email communications, instant messaging platforms, or other written communication mediums):

19 a) concerning the January 1, 2025, fire (no referred to as the Lachman Fire in
20 Topanga State Park, which started on New Year's Eve/New Years Day on December 31,
21 2024/January 1, 2025), or the burn scar left behind from that fire, BEFORE the first report of the
22 Palisades fire around 10:30 am on January 7, 2025;

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

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

28 d) between the State Parks and LAFD, LAcFD, and/or VCFD concerning the

1 Lachman Fire.

2 2 - Any documents that were in possession of State Parks, including but not limited to
3 in the possess of personnel at the Angeles District office, between January 1, 2025, and January 6,
4 2025 and that concern the Lachman Fire or the burn scar from it or the area burned by that fire.

5 3 - Training manuals or other educational materials relevant to Topanga State Parks
6 staff concerning wildfire procedures, both prevention and aftermath.

7 4. An organizational chart for Topanga State Parks.

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

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

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

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

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

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

25 11. Any agreements between the State or State Parks and the Ventura County Fire
26 Department (VCFD) for VCFD 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 **Plaintiffs Must Receive the Discovery and Not Objections and Obstruction:**

2 The great urgency here demands transparency and cooperation from the defendants. There
3 must be a zero tolerance tenor towards any frivolous objections or attempts to withhold the above
4 described highly relevant documents.

5 To the extent the defendants withhold any documents based upon privilege, privilege logs
6 must be ordered to be provided to plaintiffs concurrently with the productions. The privilege logs
7 need to include, for each document withheld, a) identify of each document; b) the specific
8 privilege asserted; c) the date the document was prepared; d) the identity if the author(s) of the
9 document; e) the identify of the recipient(s) of the document; and f) the brief description of the
10 subject matter of the document.

11 In the event there are discovery disputes related to these requests (plaintiffs believe there
12 should not be any), plaintiffs request the ability to engage in an expedited discovery dispute
13 process through ex parte application. Plaintiffs are agreeable to a several day notice requirement
14 before an ex parte, but relying upon standard motion work and the availability of the court may be
15 unworkable and risky given the substantial interests at risk.

16 For the foregoing reasons, Plaintiffs urge the Court to permit Plaintiffs to engage in limited
17 discovery immediately.

18 **1. The City's Position:**

19 The underlying reasons that the Court has kept discovery stayed have not changed, and
20 discovery should remain stayed. There are serious questions about whether any of the Plaintiffs'
21 claims against the City are legally viable. First Judge Rice, and now this Court, have kept
22 discovery stayed so that these legal questions could be resolved before exposing the City and the
23 taxpayers to the burden and expense of discovery in a case concerning a fire that, as Plaintiffs
24 allege, was started by an arsonist, not the City. Nothing in Plaintiffs' extended summary of recent
25 media articles changes the rationale for keeping discovery stayed.

26 Plaintiffs already allege that the Palisades Fire was a holdover fire from the Lachman Fire,
27 and that the State knew that there were unextinguished embers on its property. In connection with
28 their claims against the State, not the City, Plaintiffs already allege that "known embers from the

1 Lachman Fire . . . re-ignited January 7, 2025” to become the Palisades Fire; that “the State
2 permitted a dangerous fire condition to exist on its property . . . by allowing embers from the
3 Lachman Fire to smolder, rekindle, burn and re-ignite”; and that “LAFD had not staged any
4 firefighting assets in or around the vicinity of the Lachman Fire . . . to observe or interdict any
5 flare-ups that might occur.” Master Complaint ¶¶ 367, 369. Plaintiffs do not explain, because
6 they cannot, how the discovery they seek bears on their ability to adequately allege the causes of
7 action in their complaint.

8 There are additional good reasons why the purportedly targeted discovery that Plaintiffs
9 now seek should not be permitted.

10 *First*, none of this discovery is related to any claim against the City. The Plaintiffs have
11 not alleged any dangerous condition claim against the City related to the fire’s origin area, which
12 they allege was on land owned and maintained by the State. The Claims alleged against the City
13 involve (1) issues related to the LADWP water supply during the fire; (2) alleged “secondary
14 ignitions” from LADWP power equipment located at certain locations in the Palisades, but not at
15 the ignition site itself; and (3) allegations that brush on certain City-owned lots in areas away from
16 the ignition site contributed to the spread of the fire. There is no claim against the City related to
17 the fire’s origin.

18 *Second*, there is no reason to believe that any presently-existing text messages will be lost.
19 Plaintiffs contend that both a federal Grand Jury and the United States Congress have asked for
20 documents and the text messages, meaning that existing documents and text message are in the
21 process of being collected and preserved (if they have not been previously collected). The City
22 understands its preservation obligations and has repeatedly informed Plaintiffs that it is taking
23 reasonable measures to meet them.

24 *Third*, Plaintiffs have been able to obtain massive amounts of documents through their
25 California Public Records Act (“CPRA”) requests. Notably, Plaintiffs do not complain that the
26 City’s responses have been deficient, and for good reason. The Los Angeles Department of Water
27 and Power has responded to multiple CPRA requests from Plaintiff counsel, and has produced to
28 them over 4,200 documents totaling 21,972 pages (in addition to the 4,617 pages of documents

1 already produced to Plaintiffs in informal discovery). The City continues to respond to CPRA
2 requests as they are made. That is yet another reason not to launch into full-blown discovery now.

3 *Fourth*, Plaintiffs' discovery request is broad and overreaching. They are asking the Court
4 to open discovery on issues that are not relevant to any existing allegation; no plaintiff, for
5 example, has asserted a claim against the Fire Department, likely due to the long-established and
6 broad firefighting immunities. And not only are they asking for expedited document discovery,
7 interrogatories, and depositions, they appear to be asking the court to preemptively instruct the
8 City how it may respond to discovery. The Court has kept the case organized to allow for
9 threshold pleading challenges; the hearing on those pleading challenges would have been on the
10 date of this conference if not for Plaintiffs' request to change the pleading approach. There is no
11 cause to open wide-ranging discovery now before the demurrer hearing.

12 At almost every conference, Plaintiffs have come to the Court with new reasons that
13 discovery should open, and the Court has repeatedly rejected them. At the September conference,
14 it was about the reservoir. (9/8/25 Hr'g Tr. at 18:27-28 ["We need to bring before the Court
15 evidence of why that Reservoir was built."].) In April, it was about the power system. (4/23/25
16 Hr'g Tr. at 24:10-12.) Now it's LAFD text messages.

17 At the September Conference, the Court granted the Plaintiffs' request to interrupt the
18 briefing of a demurrer on a lead complaint and move to a Master Complaint framework. That
19 resulted in the City having to file a new demurrer to raise important threshold legal challenges that
20 will frame what issues are actually part of the case, and a delay of the demurrer hearing from
21 November 17, 2025, to February 5, 2026. At the time, the Court indicated it made sense to settle
22 the pleadings before opening discovery. That remains true now. The Court should keep discovery
23 closed until it can hear and resolve the serious questions about whether any of the Plaintiffs'
24 claims against the City are legally viable.

25 **2. The State's Position**

26 Under the circumstances presented, lifting the discovery stay as requested by plaintiffs is
27 not warranted at this juncture. That the State advised during the demurrer meet and confer that
28

1 notice was among one of a number of defenses to the master complaint do not present a change in
2 circumstances warranting a lift of the stay. Lack of notice, under applicable law, is a common
3 defense to any dangerous condition action which plaintiffs counsel would be aware of. Plaintiffs
4 reference to responsibility for the burn scar area is inaccurate in that State counsel was referencing
5 Public Resources Code sections 4102 through 4127 of which plaintiffs' counsel would presumably
6 be aware of. These sections discuss responsibility for preventing and suppressing fires in certain
7 areas distinguishing between local responsibility areas within a city boundary and State
8 responsibility areas elsewhere. Reference to these code sections in the meet and confer with
9 plaintiffs' counsel does not present a change in circumstances warranting a lift of the discovery
10 stay.

11 With regard to the PRA requests, staff counsel for State Parks who are handling the PRA
12 responses has previously responded in good faith to approximately 27 PRA requests related to the
13 Palisades Fire cases producing hundreds of pages of documents. There are approximately nine
14 new requests pending. Staff counsel for Parks is in the process of preparing a response to the
15 letter from plaintiffs' counsel that was received last week.

16 With regard to particular responses to individual PRA requests, plaintiffs' counsel inaccurately
17 infers that they have not received a copy of "an operating agreement for the land at issue." This
18 document was produced in response to a PRA request on May 28, 2025. Furthermore, a point by
19 point review of each category listed by plaintiffs set forth below shows that a lift of the discovery
20 stay relative to these requests is not warranted at this time as Parks is still in the process of
21 responding to these requests:

22 1 – a) This is PRA 25-230. Per the request of ATF counsel, some records were
23 withheld because they were related to an open criminal investigation.

24 b) This is PRA 25-501 - No records produced yet for this request, Parks still in the
25 record gathering phase.

26 c) This is PRA 25-501 - No records produced yet for this request, Parks still in the
27 record gathering phase.

28 d) This is PRA 25-701 - No records produced yet for this request, Parks still in the
record gathering phase.

1 2 - This is PRA 25-501 - No records produced yet for this request, Parks still in the record
2 gathering phase.

3 3 - This is PRA 25-420 - No records produced yet for this request, Parks still in the record
4 gathering phase.

5 4. This is PRA 25-420 - No records produced yet for this request, Parks still in the record
6 gathering phase.

7 5. This is PRA 25-420 - No records produced yet for this request, Parks still in the record
8 gathering phase.

9 6. PRA 25-704 - Parks produced 130 records, requestor asked for additional records.
10 Parks is still reviewing the additional request.

11 7. PRA 25-704 - Parks produced 130 records, requestor asked for additional records.
12 Parks is still reviewing the additional request.

13 8. This is PRA 25-420 - No records produced yet for this request, Parks still in the record
14 gathering phase.

15 9. This is PRA 25-701 - No records produced yet for this request, Parks still in the record
16 gathering phase.

17 10. This is PRA 25-701 - No records produced yet for this request, Parks still in the record
18 gathering phase.

19 11. This is PRA 25-701 - No records produced yet for this request, Parks still in the record
20 gathering phase.

21 **B. Status of Master Complaint and Demurrers**

22 Pursuant to this Court's order, dated September 8, 2025, Individual Plaintiffs filed a Master
23 Complaint on October 8, 2025. Defendants City and State have met and conferred as to their
24 Demurrers and are on schedule in accordance with the Court's previously set briefing schedule.

25 At the conference, Plaintiffs wish to discuss with the Court the issuance of summons by
26 the Clerk's office for the defendants newly-added in the Master Complaint. Pursuant to the Court's
27 September 8, 2025, order, the briefing schedule for the demurrers, oppositions and replies are as
28 follows:

- Deadline for Demurrers: November 13, 2028
- Deadline for Oppositions to Demurrers: December 18, 2025
- Deadline for Replies: January 15, 2026

- 1 • Hearing on Demurrers: February 5, 2026 at 1:45 p.m.

2 **C. Case Management Order No. 2**

3 Liaison Counsel for Plaintiffs and the City have met and conferred and agreed upon a form
4 Notice of Adoption of the Master Complaint, which is attached hereto as Exhibit A.

5 The City writes separately to make one point about the form Notice of Adoption. That
6 form includes a box for plaintiffs to make additional “Causation Allegations,” beyond those in the
7 Master Complaint. Plaintiffs have the choice whether to include additional causation allegations
8 or to leave the box blank and stand on the allegations in the Master Complaint. In agreeing to the
9 form for the Notice of Adoption, the City is *not* agreeing that the Master Complaint’s causation
10 allegations suffice. Indeed, the City believes that they do not because, as the City’s demurrer will
11 explain, each Plaintiff must allege causation with specificity. Nevertheless, the City agrees that
12 the form of the Notice of Adoption is not the place to litigate the adequacy of the Master
13 Complaint’s causation allegations, the City has accepted this approach to the Causation
14 Allegations section of the Notice of Adoption.

15 The State is fine with the proposed Notice of Adoption.

16 **D. Plaintiffs Request for An Omnibus Petition Re: Late Government Claims**

17 **1. Plaintiffs’ Position:**

18 As described in the Joint Case Management Conference Statement dated September 2,
19 2025, more than 10,000 fire victims served government tort claims on the LADWP, State of
20 California and other public entities prior to July 7, 2025, to ensure they met the six-month
21 deadline to serve claims arising from personal property, personal injury or wrongful death. Since
22 that date, Plaintiffs’ counsel from multiple law firms have filed hundreds of additional government
23 tort claims on behalf of more than 150 Palisades fire victims who engaged their law firm after July
24 7. These post-July 7 claims were submitted to the City of Los Angeles and LADWP, State of
25 California, County of Los Angeles, Las Virgenes Municipal Water District, and Mountains
26 Recreation and Conservation Authority (collectively the “Government Defendants”). In
27 accordance with Government Code section 911.4, each claim was accompanied by a written
28 application for leave to present a late claim for personal property, personal injury or wrongful

1 death (the “Applications”).

2 Government Code section 911.6 requires a government entity to accept a late claim if
3 “[t]he failure to present the claim was through mistake, inadvertence, surprise, or excusable
4 neglect and the public entity was not prejudiced in its defense of the claim.” The Applications
5 described how this standard was met by the claimants, who are fire victims facing overwhelming
6 logistical and psychological demands in the wake of the upheaval the Palisades Fire caused to
7 their lives. The Applications further explained how the Government Defendants would be wholly
8 unprejudiced if the Applications were granted because they have ample knowledge of the claims
9 against them stemming from the Palisades Fire.

10 Despite the facts weighing heavily in favor of accepting the Applications, not one of the
11 Applications has been accepted by the Government Defendants. Claimants either received
12 responses denying their Applications or received no response at all (which is deemed to be a
13 denial under Government Code section 912.4). In the face of the blanket denials by the
14 Government Defendants, Plaintiffs must now petition this Court for relief from the six month
15 deadline to submit claims arising from personal property, personal injury or wrongful death, as
16 described in Government Code section 946.6. Rather than filing hundreds of separate petitions,
17 Plaintiffs request that the Court permit Plaintiffs to file an omnibus petition under Government
18 Code section 946.6 that will apply to all claimants whose Applications have been denied by the
19 Government Defendants. An omnibus petition is appropriate because each claimant is seeking the
20 same relief on very similar grounds against the same Government Defendants, and would spare
21 the Court from the inefficiency of ruling on hundreds of separate petitions. Plaintiffs are prepared
22 to file an omnibus petition by December 1, 2025.

23 **2. The City’s Position:**

24 State law prescribes specific requirements for government claim presentation to protect the
25 public fisc. Plaintiffs cite no authority that would permit the Court to make an omnibus ruling on
26 different late claims applications to different public agencies alleging different reasons for failing
27 to comply with the Government Code. If a late claim application meets the criteria in Government
28 Code section 911.6, then the City will accept it for filing and evaluate the claim. If it does not,

1 then it will not. But it is simply not possible to make all of these determinations on a blanket
2 basis.

3 Although Liaison Counsel raises this issue with the City for the first time in this statement,
4 the City will meet and confer with Liaison Counsel and discuss whether there is some mutually
5 agreeable process for late claim applications. The City and Liaison Counsel met and conferred
6 constructively on other aspects of the government claims process and came up with a process that
7 allowed efficient submission of initial claims. The City is willing to meet and confer on a process
8 for submitting late claims as well.

9 **3. The State's Position:**

10 The State agrees with the City's statement in this regard and adds the following: Plaintiffs
11 do not accurately describe the status of late claim applications submitted to the State. Of the
12 approximate 100 late claim applications that have been received, none have specifically been
13 rejected except for a handful which did not include the statutorily required fee. There are a limited
14 number of late claim applications for which a response could not be processed within the requisite
15 45 day period and thus said applications were automatically denied by per statute. Late claim
16 applications with the required fee for which a response was provided within 45 days have been
17 accepted.

18
19 Dated: November 10, 2025

ROBERTSON & ASSOCIATES, LLP

20
21 By: 

Alexander Robertson, IV

22
23 Dated: November 10, 2025

FOLEY BEZEK BEHLE & CURTIS, LLP

24
25 By: 

26 Roger N. Behle, Jr.
27 Robert A. Curtis
28

1 Dated: November 10, 2025

BOYLE LAW PC

2
3 By: 

Kevin R. Boyle
Matthew J. Stumpf

4
5 Dated: November 10, 2025

MCNULTY LAW FIRM
WOOD LAW FIRM

6
7
8 By: 

Peter McNulty
E. Kirk Wood

Liaison Counsel for Individual Plaintiffs

9
10
11 Dated: November 10, 2025

MUNGER, TOLLES & OLSON LLP

12
13 By: /s/ Daniel B. Levin

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

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

14
15
16
17
18 Dated: November 10, 2025

STATE OF CALIFORNIA DEPARTMENT OF
JUSTICE

19
20 By: /s/ Kenneth G. Lake

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)*

Exhibit A

1 **[Law Firm]**

[Lawyer Name] (State Bar No. _____)

2 [Lawyer Email]

[Lawyer Address]

3 [Lawyer Telephone]

4 ***Counsel for Individual Plaintiffs***

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

PALISADES FIRE LITIGATION

[*Plaintiffs covered by SFC/ NOA*],

Plaintiffs,

vs.

DEFENDANTS NAMED HEREIN,

Defendants.

Lead Case No. 25STCV00832

Case No: [insert]

NOTICE OF ADOPTION OF MASTER COMPLAINT

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

Master Complaint Filed: October 8, 2025
Trial Date: Not set

Pursuant to the Court's Case Management Order No. 2, Plaintiff(s) hereby submit(s) this [Short Form Complaint and] Notice of Adoption of the Master Complaint against Defendants identified herein and hereby adopt(s) and incorporate(s) by reference the Master Complaint filed on October 8, 2025, and any and all amendments thereto.

A. Identity of Plaintiff(s)

Individual Plaintiff Name: _____

Business Plaintiff name: _____

Non-Business Plaintiff (i.e., trust owning property): _____

Individual Plaintiff is: ☐ An Adult ☐ A minor [If minor, Guardian ad Litem is:

_____]

[Repeat for each plaintiff covered by this NOA]

1 List names of all members of the same household who have filed suit, specifying the
2 household by name for each plaintiff:

3
4

5 **B. Factual Allegations**

6 **1. General Allegations**

7 Plaintiff(s) adopt each of the factual allegations set forth in the Master Complaint, and
8 agree to be bound by any rulings with respect to those paragraphs, except for the paragraph
9 numbers set forth below. *[If the box below is empty, then Plaintiffs will have been deemed to adopt*
10 *all factual allegations in the Master Complaint.]*

11
12
13

14 **2. Causation Allegations**

15 Plaintiffs acknowledge that causation is an element of their causes of action. Plaintiffs
16 plead that the Defendants against whom they are proceeding caused their damages as follows.
17 *[If this box is left blank, Plaintiff(s) will be deemed to have adopted only those causation*
18 *allegations that appear in the Master Complaint]*

19
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22

23 **3. Additional Factual Allegations**

24 Plaintiffs make the following additional factual allegations not included in the Master Complaint.
25 *[If the box below is empty, then Plaintiffs will have been deemed to not make any additional*
26 *factual allegations.]*

27
28

C. Causes of Action

1. Master Complaint Causes of Action and Defendants

Plaintiff(s) incorporate(s) the causes of action from the Master Complaint, and the Defendants as to each, as follows. *[Complete this table for each cause of action in the Master Complaint. Check each cause of action you are adopting and the Defendants against whom you are adopting each cause of action.]*

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
One. Dangerous Condition of Public Property (Topanga State Park) against Defendants State of California and CA State Parks and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> CA State Parks <input type="checkbox"/> Does 1-50
Two. Public Nuisance against Defendant CA State Parks and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> CA State Parks <input type="checkbox"/> Does 1-50
Three. Dangerous Condition of Public Property (Vacant Lots) against Defendant State of California and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> Does 1-50
Four. Nuisance against Defendant State of California and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> State of California <input type="checkbox"/> Does 1-50
Five. Inverse Condemnation (Power Lines) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Six. Inverse Condemnation (Water Supply System) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Seven. Dangerous Condition of Public Property (Powerlines) against Defendant LADWP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Eight. Public Nuisance (Powerlines) against Defendant LAWDP and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> LADWP <input type="checkbox"/> Does 1-50
Nine. Dangerous Condition of Public Property (Vacant Lots) Against Defendant City of Los Angeles and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> City of Los Angeles <input type="checkbox"/> Does 1-50

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Ten. Public Nuisance (Vacant Lots) against Defendant City of Los Angeles and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> City of Los Angeles <input type="checkbox"/> Does 1-50
Eleven. Inverse Condemnation (Power Poles) Against Defendant SCE and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-50
Twelve. Negligence (Overloaded Poles) Against Defendant SCE and Does 1-50.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-50
Thirteen. Trespass against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
Fourteen. Private Nuisance against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
Fifteen. Public Nuisance against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
Sixteen. Premises Liability against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
Seventeen. Violation of Public Utilities Code § 2106 against Defendant SCE	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
Eighteen. Violation of Health and Safety Code § 13007 against Defendant SCE and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SCE <input type="checkbox"/> Does 1-20
Nineteen. Inverse Condemnation (Overloaded Poles) against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
Twenty. Negligence (Overloaded Poles) against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
Twenty-One. Trespass against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
Twenty-Two. Private Nuisance against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
Twenty-Three. Public Nuisance against Defendants AT&T, Charter	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Communications, Frontier Communications and Does 1-20		<input type="checkbox"/> Does 1-20
Twenty-Four. Premises Liability against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
Twenty-Five. Violation of Health and Safety Code § 13007 against Defendants AT&T, Charter Communications, Frontier Communications and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> AT&T <input type="checkbox"/> Charter Communications <input type="checkbox"/> Frontier Communications <input type="checkbox"/> Does 1-20
Twenty-Six. Inverse Condemnation against Defendants Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
Twenty-Seven. Dangerous Condition of Public Property against Defendants Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
Twenty-Eight. Public Nuisance against Defendant Las Virgenes Municipal Water District and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Las Virgenes Municipal Water District <input type="checkbox"/> Does 1-20
Twenty-Nine. Inverse Condemnation against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
Thirty. Dangerous Condition against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
Thirty-One. Public Nuisance against Defendant L.A. County Waterworks District 29 and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> L.A. County Waterworks District 29 <input type="checkbox"/> Does 1-20
Thirty-Two. Negligence against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Three. Trespass against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Four. Private Nuisance against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Thirty-Four. ¹ Public Nuisance against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Five. Premises Liability against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Six. Violation of Health & Safety Code § 13007 against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Seven. Dangerous Condition of Public Property against Defendant Mountain Recreation and Conservation Authority and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Mountain Recreation and Conservation Authority <input type="checkbox"/> Does 1-20
Thirty-Eight. Inverse Condemnation (Natural Gas) against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Thirty-Nine. Negligence against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty. Trespass against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-One. Private Nuisance against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Two. Public Nuisance against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Three. Premises Liability against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Four. Violation of Health and Safety Code § 13007 against Defendant SoCalGas and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> SoCalGas <input type="checkbox"/> Does 1-20
Forty-Five. Negligence against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Forty-Six. Public Nuisance against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20

¹ There are two counts in the complaint labeled as count thirty four.

Master Complaint Cause of Action	Adopting this cause of action?	Against which Defendants?
Forty-Seven. Private Nuisance against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Forty-Eight. Trespass against Defendant J. Paul Getty Trust and Does 1-20	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Forty-Nine. Violation of Health and Safety Code §§ 13007, 13008 against Defendant J. Paul Getty Trust and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> J. Paul Getty Trust <input type="checkbox"/> Does 1-20
Fifty. Negligence against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-One. Public Nuisance against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Two. Private Nuisance against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile Estates Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20
Fifty-Three. Breach of Contract against Defendants Biggs Realty, Palisades Bowl Mobile Estates, LLC, Victor Martinez and Associates Inc. and Does 1-20.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Biggs Realty <input type="checkbox"/> Palisades Bowl Mobile Estates, LLC <input type="checkbox"/> Pacific Palisades Bowl Mobile States Del, LLC <input type="checkbox"/> Victor Martinez and Associates Inc. <input type="checkbox"/> Does 1-20

2. Additional Causes of Action

Plaintiff(s) assert the following additional causes of action against the additional defendants listed below. [If this table is blank, than Plaintiffs will be deemed to have not asserted

any additional causes of action against any additional defendants who are not named in the Master Complaint.]

Cause of Action	Against Which Defendants

D. Damages

Plaintiffs allege they were damaged in the following ways. *[For each type of damage you allege, provide the following information. If you need additional space to list all damages, attach an appendix. Use the blank rows at the end of the table to add any additional type of damage you allege.]*

Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
Real Property	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>For each affected property, provide the following information:</p> <p>Physical Address: Assessor's Parcel Number (APN) (if known): Connection: <input type="checkbox"/> Owner <input type="checkbox"/> Renter <input type="checkbox"/> Other <i>[describe]</i> _____</p> <p>Type of damage: <input type="checkbox"/> Total burn down <input type="checkbox"/> Flame damage, not total burn down <input type="checkbox"/> Soot or ash only <input type="checkbox"/> Landscaping only <input type="checkbox"/> Secondary structure (e.g., detached garage, ADU) only <input type="checkbox"/> Other <i>[describe]</i> _____</p> <p>This property was: <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Other <i>[describe]</i> _____</p> <p><i>[Repeat for any additional real properties.]</i></p>
Personal Property	<input type="checkbox"/> Yes <input type="checkbox"/> No	General Description (optional):

Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
Business Loss	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each affected business, provide the following information: Business Name: Business Address: Nature of Loss (e.g., inventory, lost profits, etc.): General Description (optional): <i>[Repeat for any additional businesses.]</i>
Personal Injury	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each personal injury, provide the following information: Name of injured person: Nature of injury: Date injury sustained: Location where injury sustained: <i>[Repeat for any additional injury.]</i>
Wrongful Death	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each decedent, provide the following information: Name of Decedent: Date of death: Location of death: Cause of death: Plaintiffs Asserting this Cause of Action: <i>[Repeat for any additional decedents.]</i>
Emotional Distress	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging emotional distress: Name of injured person: Nature of emotional distress (optional): <i>[Repeat for any additional plaintiffs.]</i>
Annoyance / Mental Anguish	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging annoyance or mental anguish: Name of injured person: Nature of anguish or annoyance (optional): <i>[Repeat for any additional plaintiffs.]</i>
Lost Wages	<input type="checkbox"/> Yes <input type="checkbox"/> No	For each person alleging lost wages: Name of injured person: Business at which injured person worked: <i>[Repeat for any additional plaintiffs.]</i>

Type of Damage Sustained	Did you sustain this type of damage	Particular Allegations
Loss of Use	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description (optional):
Alternate Living Expenses	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description (optional):
Other [Repeat for any additional causes of action]	<input type="checkbox"/> Yes <input type="checkbox"/> No	General description:

E. Public Entity Administrative Tort Claims

[For each public entity defendant against whom you filed administrative tort claims, please provide the following information. If you do not list a particular government entity, you will be deemed to have pled that you did not submit an administrative tort claim to that entity. Any blanks will be interpreted as a "No."]

Government Entity	Did you submit an administrative claim to this entity within the time period required by law?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Yes <input type="checkbox"/> No

[For tort claims involving personal injury, death, or damage to personal property, the claim must be presented within six months after the accrual of the cause of action. For other types of claims, the deadline is one year after accrual. Gov. Code § 911.2.]

Additional allegations relating to administrative tort claims claim (e.g., late claim application) *[If blank, then will be interpreted as "none"]*:

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Exhibit B



November 4, 2025

VIA EMAIL

Kenneth Gregory Lake
Deputy Attorney General
State of California Dept. of Justice
300 S. Spring St.
Los Angeles, CA 90013
kenneth.lake@doj.ca.gov

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Re: Status of CPRA Requests to California Department of Parks and Recreation

Counsel:

This letter concerns certain communications, manuals, agreements, and other evidence presently in possession of the State of California ("State") and California Department of Parks and Recreation ("State Parks"). For many months now, these records have been sought through California Public Records Act ("CPRA") requests to the State and State Parks. But to date, the vast majority of requested documents still have not been produced.

The following is a general description of the documents that have been the subject of CPRA requests but have not been produced.

Communications to the State Parks Regarding Lachman Fire and Burn Scar

There have been a number of CPRA requests seeking specific communications and documents regarding the Lachman fire that occurred on January 1, 2025, and the subsequent burn scar, for a relatively finite time period of one week.

On April 18, 2025, attorney Randol Schoenberg sent a CPRA request to the State Parks for production of "any communications concerning the January 1, 2025, fire, or the burn scar left behind from that fire, BEFORE the first report of the Palisades fire around 10:30 am on January 7, 2025." Mr. Schoenberg renewed his request on October 9, 2025.

On August 5, 2025, attorney Matthew Stumpf sent similar CPRA requests:

"Any email communications sent by California State Parks employees email addresses between the dates of January 1, 2025 and January 6, 2025 and regarding any of the following: a) Lachman fire; or b) Topanga Canyon; or c) Pacific Palisades; or d) fire; or e) red flag warning;

Any email communications received by California State Parks employees email addresses between the dates of January 1, 2025 and January 6, 2025 and regarding any of the following: a) Lachman fire; or b) Topanga Canyon; or c) Pacific Palisades; or d) fire; or e) red flag warning;

Any documents that were in possession of California State Parks personnel stationed at the Angeles District office between January 1, 2025, and January 6, 2025 and concern the Lachman Fire, which ignited on or about December 31, 2024 to January 1, 2025 in the Topanga Canyon State Park near the Palisades Highlands Neighborhood in Pacific Palisades, California”

On October 10, 2025, attorney Alexander Robertson sent a CPRA request to the State Parks for “PUBLIC RECORDS, including but not limited to, all communications with the LAFD, LAcFD, and/or VCFD concerning the Lachman Fire in Topanga State Park, which started on New Year's Eve on January 1, 2025.”

The State Parks has confirmed it has responsive documents but has not produced any except for a single, highly redacted Incident Detail Report:

Incident Detail Report

Incident Number: 4591915-0002
Incident Name: Lachman Fire

Time Stamps	Description	Phone Pickup
Date: 1/1/2025	Time: 00:27:14	LA CITY FIRE / INCIDENT #42

[The remainder of the form is heavily redacted with black boxes.]

The State Parks has repeatedly advised it is reviewing documents that may be responsive and thereafter sought more time. Most recently on October 14, 2025, the State Parks wrote Mr. Stumpf that it needs an additional 30 days beyond the more than 2 months that have already passed since the request was made. The State Parks has done the same as to Mr. Robertson’s requests, while flat out refusing to produce records in response to Mr. Schoenberg.

Operating Procedures, Manuals, Training, and Administrative documents

On July 11, 2025, Mr. Schoenberg sent a CPRA request seeking production of:

1. Training manuals or other educational materials relevant to Topanga State Parks staff concerning wildfire procedures, both prevention and aftermath.
2. An organizational chart for Topanga State Parks.
3. List of staff on duty from January 1 through January 7, 2025 for Topanga State Park.

On August 5, 2025, Mr. Stumpf's CPRA request included a request for "[a]ny document that addresses the California State Parks policies and procedures regarding fires, both active and in the days after a fire, that occur within California State Parks, including but not limited Topanga State Park."

On October 10, 2025, Mr. Robertson sent the State Parks a CPRA request seeking:

- "1. PUBLIC RECORDS, including but not limited to CA STATE PARKS' Department Operations Manual (DOM) that was in effect at the time of the Lachman Fire on January 1, 2025.
2. PUBLIC RECORDS, including but not limited to, "DOM Chapter 1100, Visitor Safety" referenced in § 0313.2.1.3 of CA STATE PARKS' DPR Operations Manual."

Since July 21, 2025, the State Parks has largely failed to produce any of those documents, with one exception. On October 17, 2025, the State Parks produced 33 files in response to Mr. Robertson's request. None of the documents are DOM Chapter 1100 or documents that include portions of the DOM that address the State Parks' policies and procedures regarding fires, both active and in the days after a fire.

State Parks Agreements

On July 11, 2025, Mr. Schoenberg sent a CPRA request seeking production of:

- "4. Any agreements with MRCA or SMMC concerning the trail near Skull Rock in Topanga State Park."

On October 10, 2025, Mr. Robertson sent the State Parks a CPRA request seeking:

1. PUBLIC RECORDS, including but not limited to any agreement between CA STATE PARKS and the Los Angeles City Fire Department (LAFD) for LAFD to provide fire protection, fire suppression and/or respond to wildland fires in

Topanga State Park that were in effect at the time the LACHMAN FIRE occurred on January 1, 2025;

2. PUBLIC RECORDS, including but not limited to, any agreement between CA STATE PARKS and the Los Angeles County Fire Department (LAcFD) for LAcFD to provide fire protection, fire suppression and/or respond to wildland fires in Topanga State Park that were in effect at the time the LACHMAN FIRE occurred on January 1, 2025;

3. PUBLIC RECORDS, including but not limited to, any agreement between CA STATE PARKS and the Ventura County Fire Department (VCFD) for VCFD to provide fire protection, fire suppression and/or respond to wildland fires in Topanga State Park that were in effect at the time the LACHMAN FIRE occurred on January 1, 2025;

To date, the State Parks have not produced any agreements. We believe responsive agreements exist based upon references to such agreements in a wide array of publicly available documents, including State Parks' documents.

The State Parks Must Produce These Records

The State Parks must stop withholding these documents and produce them immediately. Plenty of time has passed for the State Parks to gather and produce the documents. The State Parks has demonstrated they are able to gather and produce documents. In addition to the very minimal productions identified herein, the State Parks was able to produce records related to the Temescal Ridge Pole Replacement Project. That request was made on March 19, 2025, by Mr. Stumpf, and the State Parks produced documents within about 60 days thereafter.

Plaintiffs' Liaison Counsel Intends to Seek a Lifting of the Discovery Stay as to the State of California and California Department of Parks and Recreation

In the Palisades Fire litigation, we intend to ask the Court to lift the discovery stay as to the State of California and State Parks. We are compelled to do so by the State Parks' delay and failure to produce these documents in response to reasonable CPRA requests. We are also compelled by Governor Gavin Newsom's public statements to the media. Most recently, Governor Newsom told Fox News, "[t]he state wasn't responsible for responding to or monitoring this fire, but opportunistic plaintiffs' attorneys are now going after the California Department of Parks and Recreation."

We intend to discuss this request further with Mr. Lake tomorrow, November 5, 2025, during a prescheduled meet and confer conference call.

Very truly yours,

BOYLE LAW PC



KEVIN R. BOYLE

FOLEY BEZEK BEHLE &
CURTIS, LLP



ROGER BEHLE

MCNULTY LAW



PETER J. MCNULTY

ROBERTSON &
ASSOCIATES, LLP



ALEXANDER
ROBERTSON, IV

CC: Randol Schoenberg, Esq.
William A. Daniels, Esq.

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and not a party to this action. I am
4 employed in the County of Los Angeles, State of California. My business address is 24025 Park
5 Sorrento, Suite 100-F, Calabasas, CA 91302.

6 On November 10, 2025, I served true copies of the following document(s) described as
7 **JOINT STATUS CONFERENCE REPORT** on the interested parties in this action as follows:
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9 **BY ELECTRONIC TRANSMISSION:** Pursuant to Court Order Authorizing Electronic
10 Service, I provided the document(s) listed above electronically on the CASE ANYWHERE
11 Website to the parties on the Service List maintained on the CASE ANYWHERE Website for this
12 case. Case Anywhere is the on-line e-service provider designated in this case.

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

15 Executed on November 10, 2025, at Los Angeles, California.

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19 Maria Alegria
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