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Electronically FILED by
Superior Court of California,
County of Los Angeles
2/20/2026 6:51 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Gnade, Deputy Clerk

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10 Attorneys for Defendants
Sempra and Southern California Gas Company

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

14 DAN GRIGSBY, et al.,

15 Plaintiff,

16 vs.

17 CITY OF LOS ANGELES ACTING BY AND
THROUGH THE LOS ANGELES
18 DEPARTMENT OF WATER AND POWER, a
government entity; et al.,

19 Defendants.
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Case No. 25STCV00832

*Case Assigned for All Purposes to the
Hon. Samantha Jessner*

**NOTICE OF DEMURRER AND
DEMURRER OF DEFENDANT
SEMPRA; MEMORANDUM OF
POINTS AND AUTHORITIES**

Date: June 23, 2026
Time: 1:45 p.m.
Dept.: SS-7

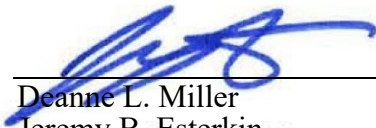
1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 23, 2026 at 1:45 p.m. before the Honorable
3 Samantha Jessner in Department 7 of the above-entitled court, located at 312 North Spring Street,
4 Los Angeles, California 90012, Defendant Sempra will and hereby does demur to Plaintiffs’
5 Amended Master Complaint (“Master Complaint”) pursuant to California Code of Civil
6 Procedure section 430.10(e) because the Master Complaint does not state facts sufficient to
7 constitute a cause of action against Sempra. *See* Cal. Civ Proc. Code § 430.10(e). This Demurrer
8 is brought following the meet and confer efforts set forth in the Declaration of Jeremy B. Esterkin
9 (“Esterkin Decl.”) pursuant to California Code of Civil Procedure section 430.41(a)(3). This
10 Demurrer is based upon this Notice of Demurrer and Demurrer, the attached Memorandum of
11 Points and Authorities, the Esterkin Decl., all pleadings and documents on file in this action, all
12 additional matters of which the Court may take judicial notice, and upon such other matters as
13 may be presented to the Court at or prior to the hearing on this Demurrer.

14 Dated: February 20, 2026

MORGAN, LEWIS & BOCKIUS LLP

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By 
Deanne L. Miller
Jeremy B. Esterkin
Colin C. West

Attorneys for Defendants
Sempra and Southern California Gas
Company

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DEMURRER


Pursuant to California Code of Civil Procedure section 430.10 *et seq.* and Cal. Rule of Court 2.112, Defendant Sempra¹ demurs to the whole of Plaintiffs’ Revised Master Complaint (“Complaint”) because the Complaint contains no factual allegations sufficient to constitute any cause of action against Sempra, nor does the Complaint allege any cause of action against Sempra.

WHEREFORE, Sempra prays:

1. That the demurrer to the Complaint be sustained without leave to amend and that judgment be entered in Sempra’s favor;² and,
2. For costs and such other and further relief that the Court may deem just and proper.

Dated: February 20, 2026

MORGAN, LEWIS & BOCKIUS LLP

By 

 Deanne L. Miller
 Jeremy B. Esterkin
 Colin C. West

Attorneys for Defendants
Sempra and Southern California Gas Company

¹ The Complaint incorrectly refers to Sempra as “Sempra Energy.”

² In the alternative, Sempra requests that the Court strike the only two mentions of Sempra from the Complaint (paragraph 32 of the Complaint and the caption of the Complaint) and dismiss Sempra as a defendant.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Although the Revised Master Complaint (“Complaint”) names Sempra as a defendant, the
3 Complaint does not allege any cause of action against Sempra, nor does it allege that Sempra
4 caused Plaintiffs any injury. The solitary mention of Sempra in the Complaint states:

5 SEMPRA ENERGY [*sic*] is, and at all relevant times was, a
6 corporation organized under the laws of the State of California,
7 doing business in the County of Los Angeles and is the parent
8 company of Southern California Gas Company, which provides
9 natural gas services to the residents of Los Angeles.

8 (Complaint ¶ 32). Excluding the case caption, no other reference to Sempra appears anywhere
9 else in the Complaint.


10 To state a claim for which relief can be granted, a plaintiff must “set forth the essential
11 facts of his case with reasonable precision and with particularity sufficient to acquaint a defendant
12 with the nature, source, and extent of his cause of action.” *Doe v. City of Los Angeles* (2007) 42
13 Cal. 4th 531, 550 (citing *Doheny Park Terrace Homeowners Assn. Inc. v. Truck Ins. Exchange*
14 (2005) 132 Cal. App. 4th 1076, 1099); *Prue v. Brady Co./San Diego, Inc.* (2015) 242 Cal. App.
15 4th 1367, 1376 (“a complaint is adequate so long as it apprises the defendant of the factual basis
16 for the claim” (citation omitted)). Plaintiffs fail to describe any act or omission of Sempra that
17 allegedly harmed Plaintiffs. Nor are any of the Complaint’s 54 causes of action directed to
18 Sempra, in violation of Cal. Rule of Court 2.112. (“Each separately stated cause of action . . .
19 must specifically state . . . (4) [t]he party or parties to whom it is directed (e.g., ‘against defendant
20 Smith’).”

21 The Complaint accordingly fails to “state facts sufficient to constitute a cause of action”
22 against Sempra, or even to provide Sempra with the barest notice of the claims against it. Cal.
23 Code Civ. P. § 430.10(e). Due process demands more than that. *See In re Marriage of Lippel*
24 (1990) 51 Cal. 3d 1160, 1166 (“It is fundamental to the concept of due process that a defendant
25 be given notice of the existence of a lawsuit and notice of the specific relief which is sought in the
26 complaint served upon him.”). The demurrer must be sustained.

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Dated: February 20, 2026

MORGAN, LEWIS & BOCKIUS LLP

By 
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Jeremy B. Esterkin
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Sempra and Southern California Gas
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PROOF OF SERVICE

I am a resident of the State of California and employed in Los Angeles County, California.
I am over the age of eighteen years and not a party to the within entitled action. My business address is 300 South Grand Avenue, 22nd Floor, Los Angeles, California 90071-3132.

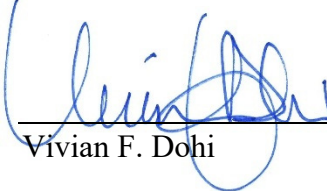
On February 20, 2026, I served a copy of the within document(s):

**NOTICE OF DEMURRER AND DEMURRER OF DEFENDANT SEMPRO;
MEMORANDUM OF POINTS AND AUTHORITIES**

BY ELECTRONIC SERVICE VIA CASE ANYWHERE: I attached a true and correct copy of the above-entitled document(s) to **Case Anywhere** by electronic transfer for service on all counsel of record by electronic service pursuant to the Order Authorizing Electronic Service. This service complies with C.C.P. § 1010.6.

Executed on February 20, 2026, at Los Angeles, California.

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



Vivian F. Dohi