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13 the Los Angeles Department of Water and Power

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 FOR THE COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

16 DAN GRIGSBY, et al.,

17 Plaintiff,

18 vs.

19 CITY OF LOS ANGELES ACTING BY AND
THROUGH THE LOS ANGELES
20 DEPARTMENT OF WATER AND POWER,
a government entity; CITY OF LOS
21 ANGELES, a government entity;
CALIFORNIA DEPARTMENT OF PARKS
22 AND RECREATION, a government entity;
STATE OF CALIFORNIA; SOUTHERN
23 CALIFORNIA EDISON COMPANY, a
California corporation; EDISON
24 INTERNATIONAL, a California corporation;
CHARTER COMMUNICATIONS, a
25 Delaware corporation; FRONTIER
COMMUNICATIONS, a Delaware
26 corporation; AT&T, Inc., a Delaware
corporation; COUNTY OF LOS ANGELES, a
27 government entity; LAS VIRGENES
MUNICIPAL WATER DISTRICT, a public
28 utility; SEMPRA ENERGY, a California

Case No. 25STCV00832

[Exempt from filing fees under Government
Code section 6103]

**RESPONSE TO PLAINTIFFS' REQUEST
FOR JUDICIAL NOTICE**

Date: February 5, 2026

Time: 1:45 p.m.

Dept.: 7

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

Action Filed: January 13, 2025

Trial Date: Not set

1 corporation; SOUTHERN CALIFORNIA
2 GAS COMPANY, a California corporation; J.
3 PAUL GETTY TRUST, a California
4 charitable trust; MOUNTAIN RECREATION
AND CONSERVATION AUTHORITY, and
DOES 1 through 50, inclusive,

Defendants.

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7 Plaintiffs request judicial notice of (1) Defendants' Reply In Support of Demurrer, *Fix the*
8 *City, Inc. v. City of Los Angeles et al.*, No. 23STCP03519 (Super. Ct. L.A. County, Central Dist.,
9 Dept. 86, filed Mar. 21, 2024); (2) Ruling on Demurrer to Verified First Amended Petition for
10 Writ of Mandate, *Fix the City, Inc. v. City of Los Angeles et al.*, No. 23STCP03519 (Super. Ct.
11 L.A. County, Central Dist., filed May 30, 2024); and (3) Respondents' Brief, *Fix the City, Inc. v.*
12 *City of Los Angeles et al.*, No. B339464 (Cal. Ct. App., 2d Dist., 1st Div., filed Oct. 20, 2025). To
13 the extent the Court deems these judicial pleadings relevant, the City does not oppose taking
14 judicial notice of the existence of the court records. As addressed in the City's Reply brief,
15 however, nothing in the *Fix the City* matter supports Plaintiffs' arguments for judicial estoppel.

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18 DATED: January 15, 2026

MUNGER, TOLLES & OLSON LLP

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20 By: /s/ Daniel B. Levin

21 DANIEL B. LEVIN

22 Attorneys for Defendant City of Los Angeles and
23 the Los Angeles Department of Water and Power
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