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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

16 DAN GRIGSBY, et al.,

Case No. 25STCV00832

17 Plaintiff,

[Exempt from filing fees under Government Code section 6103]

18 |

19 CITY OF LOS ANGELES ACTING BY AND
20 THROUGH THE LOS ANGELES
21 DEPARTMENT OF WATER AND POWER, a government entity; CITY OF LOS
22 ANGELES, a government entity; CALIFORNIA DEPARTMENT OF PARKS
23 AND RECREATION, a government entity; STATE OF CALIFORNIA; SOUTHERN
24 CALIFORNIA EDISON COMPANY, a California corporation; EDISON
25 INTERNATIONAL, a California corporation; CHARTER COMMUNICATIONS, a
26 Delaware corporation; FRONTIER COMMUNICATIONS, a Delaware corporation; AT&T, Inc., a Delaware corporation; COUNTY OF LOS ANGELES, a government entity; LAS VIRGENES
27 MUNICIPAL WATER DISTRICT, a public utility; SEMPRA ENERGY, a California
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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
charitable trust; MOUNTAIN RECREATION
3 AND CONSERVATION AUTHORITY, and
4 DOES 1 through 50, inclusive,

5 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, 3024); 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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