

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

South Central District, Compton Courthouse, Department A

24CMCV01105

**FA'ALAGILAGI MENI-SILGA vs A'S CONTRACTOR INC.,
et al.**

September 11, 2026

10:00 AM

Judge: Honorable Elizabeth L. Bradley
Judicial Assistant: T. Johnson-Butler
Courtroom Assistant: K. Gray

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): By Justin Hassani for Eric M. Khodadian (Via LACourtConnect)

For Defendant(s): By David A. Tartaglio for Steven J. Elie; Jacqueline Anna Robinson (Via LACourtConnect)

NATURE OF PROCEEDINGS: Order to Show Cause Re: Sanctions Against Jacqueline Anna Robinson

The matter is called for hearing.

The Court confers with counsel regarding the current posture of the case.

Jacqueline Anna Robinson Bar No. 305628 of Musick, Peeler & Garrett LLP
- 333 S. Hope Street and Suite 2900 Los Angeles CA 90071 are ordered to pay sanctions in the amount of \$999.99 to the Superior Court of California, County of Los Angeles by 10/11/2026 pursuant to Code of Civil Procedure section 177.5 for the reason(s) stated below.

Failure to pay sanctions by the due date will result in this matter being forwarded to the Collections Division at 111 N. Hill Street, Room 616, Los Angeles, CA 90012 for referral to a private collections vendor without further notice or order of the Court.

On August 28, 2026, the court issued an order setting for hearing on September 11, 2026 the pending Order to Show Cause why the court should not order attorney Jacqueline Anna Robinson to pay reasonable monetary sanctions to the court in an amount not to exceed \$5,000 for failure without good cause to comply with California Rules of Court, rule 3.1113. (August 28, 2026 Order.) The clerk electronically served the court's August 28, 2026 order on counsel for the parties, including Jacqueline Anna Robinson. (August 28, 2026 Certificate of Service by Electronic Service.)

On September 3, 2026, attorney Jacqueline Anna Robinson ("Counsel") filed a declaration in response to the court's order to show cause.

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Upon consideration of the record and Counsel's declaration, the court finds that Counsel failed without good cause to comply with California Rules of Court, rule 3.1113 by including, in various motions in limine filed by Counsel on behalf of Defendant State Farm Insurance Company ("State Farm"), incorrect citations to cases, citations to cases that do not support the propositions state and citations to fictitious cases. (Cal. Rules of Ct., rule 2.30, subd. (d) ["An order imposing sanctions must be in writing and must recite in detail the conduct or circumstances justifying the order"].)

"To state the obvious, it is a fundamental duty of attorneys to *read* the legal authorities they cite in appellate briefs or any other court filings to determine that the authorities stand for the propositions for which they are cited." (*Noland v. Land of the Free, L.P.* (2025) 114 Cal.App.5th 426, 445.) "[A]ttorneys must check every citation to make sure the case exists and the citations are correct. [Citation.] Attorneys should not cite cases for legal propositions different from those contained in the cases cited." (*People v. Alvarez* (2025) 114 Cal.App.5th 1115, 1119.) "[N]o brief, pleading, motion, or any other paper filed in any court should contain *any* citations—whether provided by generative AI or other source—that the attorney responsible for submitting the pleading has not personally read and verified." (*Noland, supra*, 114 Cal.App.5th at p. 431.)

"Submitting fictitious cases and quotations to the court 'degrades or impugns the integrity of the Court' and 'interferes with the administration of justice' in violation of [federal] Local Rule 180(e), and violates California Rules of Professional Conduct 3.1(a)(2), 3.3(a)(1), and 3.3(a)(2)." (*United States v. Hayes* (E.D. Cal. 2025) 763 F.Supp.3d 1054, 1064; Cal. Rules of Professional Conduct, rule 3.3, subds. (a)(1) [a lawyer shall not knowingly make a false statement of law to a tribunal], (a)(2) [a lawyer shall not knowingly misquote to a tribunal the language of a statute, decision, or other authority].) Further, "[m]any harms flow from the submission of fake opinions. The opposing party wastes time and money in exposing the deception. The Court's time is taken from other important endeavors. The client may be deprived of arguments based on authentic judicial precedents. There is potential harm to the reputation of judges and courts whose names are falsely invoked as authors of the bogus opinions and to the reputation of a party attributed with fictional conduct. It promotes cynicism about the legal profession and the American judicial system. And a future litigant may be tempted to defy a judicial ruling by disingenuously claiming doubt about its authenticity." (*Id.* at pp. 1063-1064.)

Had counsel read or attempted to read the cases cited in State Farm's motions in limine, Counsel would have discovered that the cases did not support the propositions for which they

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were cited or did not exist. (*Noland, supra*, 114 Cal.App.5th at p. 445.)

Counsel concedes in her Declaration that there were seven case citations across State Farm's eight (8) motions in limine that "simply did not exist," including the following:

- a. State Farm's Motion in Limine No. 1:
 - (i) People v. Safford, 35 Cal.4th 996, 1009 (2005) [Motion at page 5, lines 19-20]
 - (ii) People v. Hart, 45 Cal.5th 825 (2020) [Motion at page 5, lines 27-28],
 - (iii) People v. Baca, 5 Cal.5th 318, 335 (2021) [Motion at page 7, line 10]
 - (iv) (iv) Pacific Gas & Elec. Co. v. Super. Ct., 12 Cal.4th 1136, 1147 (1996) [Motion at page 7, line 21]
- b. State Farm's Motion in Limine No. 3:
 - (i) Almeida v. State Farm Mut. Auto. Ins. Co., 53 Cal.App.5th 537, 545 (2020) [Motion at page 5, lines 2-4]
 - (ii) Miller v. State Farm Mut. Auto. Ins. Co., 58 Cal.4th 141 (2014) [Motion at page 6, lines 19-21]
- c. State Farm's Motion in Limine No. 5:
 - (i) Stokes v. Cambria Corp., 114 Cal.App.4th 1485 (2003) [Motion at page 7, lines 10-12]. (Robinson Dec., ¶ 5.)

In addition, the Memorandum of Points and Authorities submitted in support of State Farm's Motion in Limine No. 1 twice misstated the case title of Wesson v. Staples, 68 Cal.App.5th 746 (2021) on page five at lines 12 and 18.

Furthermore, ... the Court's decision in *People v. Kelly*, 17 Cal.3d 24, 39 (1976) does not directly state that evidence offered must have a "tendency in reason" to prove a material fact.

In State Farm's Motion in Limine No. 3, ... the quotes "[T]he regulations are not a substitute for a bad faith action" and "probative value of this evidence is minimal, while potential for prejudice is great" are not direct quotes from the decision in *Rattan v. United Servs. Auto. Ass'n*, 84 Cal.App.4th 715 (2000).

In State Farm's Motion in Limine No. 4, State Farm cites to *Egan v. Mutual of Omaha Ins. Co.*, 24 Cal.3d 809, 819 for the proposition that "an insurer only has a duty to investigate the claim as presented by its insured." (See p. 7:19-20.) But the case does not say that at all. Instead, it states that "To protect these interests it is essential that an insurer fully inquire into possible bases that might support the insured's claim." (*Egan v. Mut. of Omaha Ins. Co.* (1989) 24 Cal.3d

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809, 819.)

In Motion in Limine No. 5, the Points and Authorities erroneously attribute two direct quotes to the decision in *Nickerson v. Stonebridge Life Ins. Co.*, 63 Cal.4th 363, 374 (2016) on page 4 at line 17 and page 6 at lines 9-11. An erroneous quotation of *People v. Morris* (1981) 53 Cal.3d 152, 188 was also cited.

Robinson takes responsibility as the author of the motions for these acts and omissions. Robinson signed each of the motions at issue.

Based on the conduct described above, the court finds that Counsel failed, without good cause, to comply with the requirements set forth in California Rules of Court, rule 3.1113 (1) that a supporting memorandum contain “a concise statement of the law” “and a discussion of the statutes, cases, and textbooks cited in support of the position advanced[.]” because Defendant’s aforementioned motions cite nonexistent cases, include incorrect citations to multiple cases that do not support the propositions for which they are cited, include nonexistent case quotations, and include incorrect citations to cases that do not appear to be mere clerical or typographical errors. (Cal. Rules of Ct., rule 3.1113, subds. (b), (c); see *Noland, supra*, 114 Cal.App.5th at p. 447 [finding the appeal “unreasonably violates the Rules of Court because it does not support each point with citations to real (as opposed to fabricated) legal authority[.]” citing rule 8.204, subdivision (a)(1)(B), which requires that each brief must “support each point by argument and, if possible, by citation of authority”].)

The court finds that the conduct described above justifies the imposition of sanctions against Counsel. (Cal. Rules of Ct., rule 2.30, subd. (b).) In determining the amount of sanctions to impose, the court has considered Counsel’s declaration, in which Counsel, *inter alia*, has (1) taken responsibility for the inaccurate and fabricated citations and has apologized to the court, and (2) stated that Counsel has taken steps to ensure this does not happen again, including taking “affirmative steps to educate [her]self concerning the responsible use of generative AI in the legal practice,” including attending a CLE course on August 20, 2026 hosted by Thomson Reuters regarding Practical AI Ethics for Legal Practitioners, which addressed an attorney’s duties of competence and ethics. Counsel’s Declaration also describes new practices Counsel has instituted regarding the ethical use of AI. (Robinson Declaration, ¶¶ 4-5.)

Based on the Robinson Declarations and representations and argument provided by Counsel as well as David Tartaglio, Esq. of Musick, Peeler & Garrett, LLP on her behalf, the court finds that \$999.99 is a reasonable amount of monetary sanctions to impose.

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For the reasons set forth above, the court orders attorney Jacqueline Ann Robinson to pay monetary sanctions to the Clerk of the Superior Court of Los Angeles County in the amount of \$999.99 no later than 30 days from the date of this order.

The Court directs the clerk to give notice of this ruling.

IT IS SO ORDERED.

Certificate of Service is attached.