

08/28/2026

David W. Slayton, Executive Officer / Clerk of Court

By: T. Johnson-Butler Deputy

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES – SOUTH CENTRAL DISTRICT
DEPARTMENT A – COMPTON COURTHOUSE

FA'ALAGILAGI MENI-SILIGA;

Plaintiff,

vs.

A'S CONTRACTOR INC., , et al.;

Defendants.

Case No.: 24CMCV01105

**ORDER SETTING ORDER TO SHOW
CAUSE WHY THE COURT SHOULD
NOT ORDER COUNSEL FOR
DEFENDANT STATE FARM
INSURANCE COMPANY TO PAY
REASONABLE MONETARY
SANCTIONS TO THE COURT**

During a hearing on August 7, 2026, counsel for plaintiff advised the court of their belief that various motions in limine filed on behalf of State Farm Insurance Company ("State Farm") contain citations to nonexistent cases, nonexistent case quotations, and nonexistent case holdings. On August 10, 2026, plaintiff filed the Declaration of Eric M. Khodadian outlining these issues. On August 11, 2026, defendant filed the Declarations of Kenneth G. Katel and Jacqueline A. Robinson, in which counsel conceded inclusion of numerous nonexistent cases, quotations, holdings and nonexistent and/or incorrect citations.

"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

1 for submitting the pleading has not personally read and verified.” (*Noland, supra*, 114
2 Cal.App.5th at p. 431.)

3 “Submitting fictitious cases and quotations to the court ‘degrades or impugns the integrity
4 of the Court’ and ‘interferes with the administration of justice’ in violation of [federal] Local
5 Rule 180(e), and violates California Rules of Professional Conduct 3.1(a)(2), 3.3(a)(1), and
6 3.3(a)(2).” (*United States v. Hayes* (E.D. Cal. 2025) 763 F.Supp.3d 1054, 1064; Cal. Rules of
7 Professional Conduct, rule 3.3, subds. (a)(1) [a lawyer shall not knowingly make a false
8 statement of law to a tribunal], (a)(2) [a lawyer shall not knowingly misquote to a tribunal the
9 language of a statute, decision, or other authority].) Further, “[m]any harms flow from the
10 submission of fake opinions. The opposing party wastes time and money in exposing the
11 deception. The Court’s time is taken from other important endeavors. The client may be
12 deprived of arguments based on authentic judicial precedents. There is potential harm to the
13 reputation of judges and courts whose names are falsely invoked as authors of the bogus
14 opinions and to the reputation of a party attributed with fictional conduct. It promotes cynicism
15 about the legal profession and the American judicial system. And a future litigant may be
16 tempted to defy a judicial ruling by disingenuously claiming doubt about its authenticity.” (*Id.*
17 at pp. 1063-1064.)

18 It appears to the court that defendants’ counsel did not read all of the cases cited in
19 defendant’s motions in limine because, had counsel read them, counsel would have discovered
20 that the cases did not support the propositions for which they were cited or did not exist.
21 (*Noland, supra*, 114 Cal.App.5th at p. 445.)

22 According to the Robinson Declaration, there were seven case citations across State
23 Farm’s eight (8) motions in limine that “simply did not exist,” including the following:

24 a. State Farm’s Motion in Limine No. 1:

- 25 (i) *People v. Safford*, 35 Cal.4th 996, 1009 (2005) [Motion at page 5, lines 19-20]
26 (ii) *People v. Hart*, 45 Cal.5th 825 (2020) [Motion at page 5, lines 27-28],
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(iii) People v. Baca, 5 Cal.5th 318, 335 (2021) [Motion at page 7, line 10] (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.)

Robinson further attests:

"6. I also unfortunately discovered that 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...

7. 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...

9. As it relates to 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) ..."

The Khodadian Declaration provides the following as to State Farm's Motion in Limine No. 4:

1 16. In SF MLIM No. 4, State Farm cites to Egan v. Mutual of Omaha Ins. Co., 24 Cal.3d
2 809, 819 for the proposition that “an insurer only has a duty to investigate the claim as
3 presented by its insured.” (SF MLIM No. 4 at 7:19-20.) But the case does not say that at
4 all. Instead, it states that “To protect these interests it is essential that an insurer fully
5 inquire into possible bases that might support the insured’s claim.” (Egan v. Mut. of
6 Omaha Ins. Co. (1989) 24 Cal.3d 809, 819.)

7 Robinson’s response does not contradict this assertion, and instead references a similar
8 holding in another case. As to Motion in Limine No. 5, Robinson concedes:

9 11. ...[W]e acknowledge the Points and Authorities erroneously attributes two direct
10 quotes to the decision in Nickerson v. Stonebridge Life Ins. Co., 63 Cal.4th 363, 374
11 (2016) on page 4 at line 17 and page 6 at lines 9-11.

12 Robinson fails to address it’s erroneous quotation of *People v. Morris* (1981) 53 Cal.3d
13 152, 188 referenced at paragraph 19 of the Khodadi Declaration.

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

16 Based on the conduct described above, it appears that Robinson failed to comply with the
17 requirements set forth in California Rules of Court, rule 3.1113 (1) that a supporting
18 memorandum contain “a concise statement of the law” “and a discussion of the statutes, cases,
19 and textbooks cited in support of the position advanced[.]” because Defendant’s aforementioned
20 motions cite fabricated cases, include incorrect citations to multiple cases that do not support the
21 propositions for which they are cited, include nonexistent case quotations, and include incorrect
22 citations to cases that do not appear to be mere clerical or typographical errors. (Cal. Rules of
23 Ct., rule 3.1113, subds. (b), (c); see *Noland, supra*, 114 Cal.App.5th at p. 447 [finding the appeal
24 “unreasonably violates the Rules of Court because it does not support each point with citations to
25 real (as opposed to fabricated) legal authority[.]” citing rule 8.204, subdivision (a)(1)(B), which
26 requires that each brief must “support each point by argument and, if possible, by citation of
27 authority”].)

1 The court, on its own motion, sets for hearing on September 11, at 10:00 a.m., in
2 Department A, an Order to Show Cause why the court should not order attorney Jaqueline A.
3 Robinson to pay reasonable monetary sanctions to the court in an amount not to exceed \$5,000
4 for failure without good cause to comply with California Rules of Court, rule 3.1113. (Cal.
5 Rules of Ct., rule 2.30, subds. (b) ["the court may order a person, after written notice and an
6 opportunity to be heard, to pay reasonable monetary sanctions to the court . . . for failure without
7 good cause to comply with the applicable rules"], (c).) Further response, if any, to the Order to
8 Show Cause shall be served and filed no later than September 8, 2026.

9 The court directs the clerk to give notice of this ruling.

10
11 IT IS SO ORDERED.

12
13 DATED: August 28, 2026

14
15
16 Elizabeth L. Bradley
Judge of the Superior Court

