

No. S274625

**IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA**

EVERARDO RODRIGUEZ and JUDITH V. ARELLANO,

Plaintiffs and Appellants,

v.

FCA US, LLC,

Defendant and Respondent.

California Court of Appeal, Fourth District, Division Two, Civil No. E073766
Appeal from Riverside County Superior Court
Case No. RIC1807727
Honorable Jackson Lucky, Judge Presiding

**PETITIONERS' MOTION FOR JUDICIAL NOTICE;
DECLARATION OF CYNTHIA E. TOBISMAN;
[PROPOSED] ORDER
[Evidence Code Sections 451, 452, 453, 459]**

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MOTION FOR JUDICIAL NOTICE

Pursuant to California Rules of Court rule 8.252(a), and in conjunction with the concurrently-filed Opening Brief on the Merits, petitioners Everardo Rodriguez and Judith V. Arellano hereby move the Court to take judicial notice of the following documents submitted in the concurrently-filed, consecutively-paginated appendix:

- Exhibit A: Volume 1 of 5 of the Exhibits To Motion For Judicial Notice that defendant FCA US, LLC (“FCA”) filed in the Court of Appeal proceeding below (E073766), containing legislative history materials that FCA considered relevant to the statutory-interpretation question at issue in this case.
- Exhibit B: Volume 2 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766), containing legislative history materials that FCA considered relevant to the statutory-interpretation question at issue in this case.
- Exhibit C: Volume 3 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766), containing legislative history materials that FCA considered relevant to the statutory-interpretation question at issue in this case.
- Exhibit D: Volume 4 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766), containing legislative

history materials that FCA considered relevant to the statutory-interpretation question at issue in this case.

- Exhibit E: Volume 5 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766), containing legislative history materials that FCA considered relevant to the statutory-interpretation question at issue in this case.
- Exhibit F: Legislative history materials for Assembly Bill 1787 (1981-1982 Reg. Sess.) Stats. 1982, ch. 388, § 1.
- Exhibit G: Legislative history materials for Assembly Bill 4513 (1987-1988 Reg. Sess.) Stats. 1988, ch. 697, § 1.
- Exhibit H: Legislative history materials for Assembly Bill 1848 (1997-1998 Reg. Sess.) Stats. 1998, ch. 503, § 1.
- Exhibit I: Legislative history materials for Senate Bill 1718 (1999-2000 Reg. Sess.) Stats. 1995, ch. 503, § 1.
- Exhibit J: Legislative history materials for Senate Bill 234 (2007-2008 Reg. Session), Stats. 2007, ch. 151, § 2.

Good cause exists to judicially notice these documents because, as the attached memorandum explains, either FCA or petitioners considers these legislative history materials potentially relevant to the parties' dispute over whether the phrase "or other motor vehicle sold with a manufacturer's new car warranty" in Civil Code section 1793.22's definition of a "new

motor vehicle” covers sales of used vehicle still covered by the manufacturer’s express new car warranty.

This Motion is based on Evidence Code sections 451, 452, 453 and 459, the attached memorandum, the attached Declaration of Cynthia E. Tobisman, the concurrently-filed exhibits, and the briefs filed in this appeal.

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MEMORANDUM OF POINTS AND AUTHORITIES

As petitioners' accompanying Opening Brief on the Merits explains, as does their petition for review, this appeal concerns whether the phrase "or other motor vehicle sold with a manufacturer's new car warranty" in Civil Code section 1793.22's definition of a "new motor vehicle," part of the Song-Beverly Consumer Warranty Act (the Act), covers sales of used vehicles still covered by the manufacturer's express new car warranty.¹

To the extent this Court decides to consider extrinsic interpretative aids beyond the plain language, such as legislative history, the exhibits provided with this Motion will assist the Court in that endeavor.

The exhibits consist of the following legislative history:

- Exhibit A consists of Volume 1 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766). It contains materials provided by the Legislative Intent Service regarding (a) Chapter 1333, Statutes of 1970, enacting the Act's initial provisions; (b) Chapter 1523, Statutes of 1971, amending various Act provisions and adding new ones; and (c) Chapter 169, Statutes of 1974, amending section 1795.5.

¹ All further statutory references are to the Civil Code unless otherwise indicated.

- Exhibit B consists of Volume 2 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766). It contains materials provided by the Legislative Intent Service regarding (a) Chapter 991, Statutes of 1978, amending various Act provisions; (b) Chapter 385, Statutes of 1982, repealing and reenacting section 1794; (c) Chapter 728, Statutes of 1983, amending sections 1795.1, 1795.5 and 1795.6; and (d) Chapter 1047, Statutes of 1985, amending sections 1791 and 1794.4 and adding section 1794.41.
- Exhibit C pertains to Volume 3 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766). It contains materials provided by the Legislative Intent Service regarding Chapter 1280, Statutes of 1987. Among other things, this amendment to the Act expanded the “new motor vehicle” definition to include the language at issue here—a “dealer-owned vehicle and a ‘demonstrator’ or other motor vehicle sold with a manufacturer’s new car warranty.”
- Exhibit D consists of Volume 4 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766). It contains materials provided by the Legislative Intent Service regarding (a) Chapter 1265, Statutes of 1993, amending, repealing and adding section 1791 and

1794.4; and (b) Chapter 196, Statutes of 1998, amending section 1791.

- Exhibit E consists of Volume 5 of 5 of the Exhibits To Motion For Judicial Notice that FCA filed in the Court of Appeal proceeding below (E073766). It contains materials provided by the Legislative Intent Service regarding Assembly Bill 1367 as considered in 1987, which began as a proposed amendment to section 1794 but ended up as amendment to Business & Professions Code section 9889.75.
- Exhibit F pertains to Assembly Bill 1787 (1981-1982 Reg. Sess.) Stats. 1982, ch. 388, § 1. Among other things, this amendment to the Act, known as the “lemon law” bill, added the Act’s first “new motor vehicle” definition. The Legislative Intent Service provided these materials.
- Exhibit G pertains to Assembly Bill 4513 (1987-1988 Reg. Sess.) Stats. 1988, ch. 697, § 1. This amendment to the Act expanded the “new motor vehicle” definition to include certain portions of motorhomes. The Legislative Intent Service provided these materials.
- Exhibit H pertains to Assembly Bill 1848 (1997-1998 Reg. Sess.) Stats. 1998, ch. 503, § 1. This amendment to the Act expanded the “new motor vehicle” definition to include certain business vehicles. We obtained these materials from the California Legislature’s official

website for legislative history information,
www.leginfo.legislature.ca.gov.

- Exhibit I pertains to Senate Bill 1718 (1999-2000 Reg. Sess.) Stats. 1995, ch. 503, § 1. This amendment to the Act made further changes to the “new motor vehicle” definition regarding business vehicles. We obtained these materials from the California Legislature’s official website for legislative history information, www.leginfo.legislature.ca.gov.
- Exhibit J pertains to Senate Bill 234 (2007-2008 Reg. Session), Stats. 2007, ch. 151, § 2, which added Civil Code section 1795.8. The legislative history for this amendment to the Act mentions *Jensen v. BMW of North America, Inc* (1995) 35 Cal.App.4th 112 (*Jensen*) and describes the Act’s coverage for motor vehicles in a manner consistent with *Jensen*’s interpretation of the “new motor vehicle” definition. We obtained these materials from the California Legislature’s official website for legislative history information, www.leginfo.legislature.ca.gov.

As we will show, each exhibit is a proper subject of judicial notice and is relevant to this appeal. Judicial notice of these exhibits is therefore proper.

I. These Legislative History Materials Are Proper Subjects Of Judicial Notice.

Like trial courts, an appellate court's power and obligation to take judicial notice is governed by Evidence Code sections 451, 452 and 453. (Evid. Code, § 459; *People v. Ouellette* (1969) 271 Cal.App.2d 33, 36.) Section 451 identifies the materials for which judicial notice "must" be taken, and section 452 identifies the materials for which judicial notice "may" be taken. (Evid. Code, §§ 451, 452.) Under section 453, judicial notice of any matter specified in section 452 is compulsory if a party requests judicial notice and (a) "[g]ives each adverse party sufficient notice of the request . . . to enable such adverse party to prepare to meet the request" and (b) "[f]urnishes the court with sufficient information to enable it to take judicial notice of the matter." (Evid. Code, § 453, subds. (a), (b).)

The exhibits here are judicially noticeable under all three provisions.

Section 451 requires courts to take judicial notice of "[t]he decisional, constitutional, and public statutory law of this state." (Evid. Code, § 451.) The requirement that courts take judicial notice of the law extends to a statute's legislative history. (See Cal. Law Revision Com. com., 29B West's Ann. Evid. Code (2011 ed.) foll. § 450, p. 93 ["That a court may consider legislative history . . . is inherent in the requirement that it take judicial notice of the law"].) It is well settled that this Court may take judicial notice of legislative history under the Evidence Code.

(See, e.g., *Soukup v. Law Offices of Herbert Hafif* (2006) 39 Cal.4th 260, 279, fn. 9 (*Soukop*).

Petitioners obtained the legislative history materials from the following sources: (1) materials that FCA itself provided to the Court of Appeal below and obtained from the Legislative Intent Service; (2) materials that petitioners obtained from the Legislative Intent Service; and (3) materials that petitioners obtained from the California Legislature’s official website for legislative history information, www.leginfo.legislature.ca.gov.

To avoid accusations that petitioners cherry-picked documents or chose to withhold non-favorable materials, petitioners are providing this Court with *all* of the materials that FCA provided to the Court of Appeal and that petitioners obtained from the Legislative Intent Service and the California Legislature’s official website for legislative history information, www.leginfo.legislature.ca.gov. (Tobisman Decl., ¶ 5; see *People v. Valenzuela* (2001) 92 Cal.App.4th 768, 776, fn. 4 [“W]e are reluctant to sanction defense counsel’s selective presentation of one excerpt from the legislative history obtained from the Legislative Intent Service. The entire legislative history should have been submitted to us.”].)

The Legislative Intent Service materials may contain some documents that are not the proper subject of judicial notice. In the accompanying Opening Brief on the Merits, petitioners only cite or intend to rely upon legislative history materials that *are* the proper subject of judicial notice. (Tobisman Decl., ¶ 6; see *Soukup, supra*, 39 Cal.4th at p. 279, fn. 9 [taking judicial notice

of “various versions of the legislation and committee reports”]; *Committee for Green Foothills v. Santa Clara County Bd. Of Supervisors* (2010) 48 Cal.4th 32, 49, fn. 15 [“[W[e] have routinely found enrolled bill reports, prepared by a responsible agency contemporaneous with passage and before signing, instructive on matters of legislative intent.”].)

II. The Exhibits Are Relevant To This Appeal.

If the Court decides to consider legislative history, these legislative-history exhibits will aid the court in determining whether the phrase “or other motor vehicle sold with a manufacturer’s new car warranty” in section 1793.22’s “new motor vehicle” definition covers sales of used vehicles still covered by the manufacturer’s express new car warranty, as the Court of Appeal held almost three decades ago in *Jensen, supra*, 35 Cal.App.4th 112.

The Court of Appeal’s opinion references legislative history materials that FCA submitted regarding the 1987 amendment to the Act, which expanded the Act’s “new motor vehicle” definition to include the language at issue here—a “dealer-owned vehicle and a ‘demonstrator’ or other motor vehicle sold with a manufacturer’s new car warranty.” Those materials are in Exhibit C hereto. The rest of FCA’s materials concern the adoption or amendment of Civil Code sections that do not involve the Act’s specific “new motor vehicle” definition but that FCA believes are relevant. (See Exhibits A-B, D-E.)

Petitioners also submit Exhibits F through J to this Court, which FCA did not provide to the Court of Appeal. These legislative history materials concern: (1) the Legislature’s adoption of the “new motor vehicle” definition in 1982 and all amendments to the “new motor vehicle” definition other than the 1987 amendment materials already in Exhibit C; and (2) the Legislature’s adoption of section 1795.8 (that statute’s legislative history acknowledges *Jensen*’s interpretation of the “new motor vehicle” definition and describes the Act’s coverage for motor vehicles in a manner consistent with *Jensen*’s interpretation).

Petitioners submit that the Act’s plain language unambiguously shows that section 1793.22’s “new motor vehicle” definition covers sales of used vehicle still covered by the manufacturer’s express new car warranty. But if this Court nonetheless decides to consider interpretative aids beyond the plain language, the legislative history submitted with this motion will assist the Court. The legislative history confirms that the *Jensen* court got it right.

III. Conclusion.

As the accompanying Opening Brief on the Merits explains, petitioners Everardo Rodriguez and Judith V. Arellano submit that the Act’s plain language conclusively establishes that section 1793.22’s “new motor vehicle” definition covers sales of used vehicles still covered by the manufacturer’s express new car warranty. To the extent this Court nonetheless decides to consider extrinsic interpretive aids, the materials submitted with

this Motion will aid the Court's analysis.

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DECLARATION OF CYNTHIA E. TOBISMAN

I, Cynthia E. Tobisman, declare as follows:

1. I am an attorney licensed to practice law in the State of California and am a partner in the law firm of Greines, Martin, Stein & Richland LLP (“GMSR”), which specializes exclusively in appellate practice. GMSR is appellate counsel of record for petitioners Everardo Rodriguez and Judith V. Arellano. I am the GMSR partner with primary responsibility for this appeal.

2. Exhibits A through E in the accompanying appendix are true and correct copies of legislative history materials that FCA submitted to the Court of Appeal in this case.

3. Exhibits A through G in the accompanying appendix are true and correct copies of legislative history materials that the Legislative Intent Service provided either to FCA or to my firm.

4. Exhibits H through J in the accompanying appendix are true and correct copies of legislative history materials that my firm obtained from the California Legislature’s official website for legislative history information, www.leginfo.legislature.ca.gov.

5. To avoid accusations of cherry-picking, we have provided this Court with *all* of the materials that FCA provided to the Court of Appeal and that petitioners obtained from the Legislative Intent Service and the California Legislature’s official website for legislative history information. The only alteration we made to those materials was to consecutively paginate the

exhibits with “MJN” numbers for ease of reference in the parties’ briefs.

6. In the accompanying Opening Brief on the Merits, petitioners only cite to or rely on portions of the legislative history materials that are proper subjects of judicial notice. We do not intend to rely upon any materials that fall outside the scope of proper judicial notice.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on October 11, 2022, at Los Angeles, California.



Cynthia E. Tobisman

No. S274625

**IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA**

EVERARDO RODRIGUEZ and JUDITH V. ARELLANO,

Plaintiffs and Appellants,

v.

FCA US, LLC,

Defendant and Respondent.

California Court of Appeal, Fourth District, Division Two, Civil No. E073766

Appeal from Riverside County Superior Court

Case No. RIC1807727

Honorable Jackson Lucky, Judge Presiding

[PROPOSED] ORDER

IT IS HEREBY ORDERED that, pursuant to Evidence Code sections 451, 452, 453 and 459, and rule 8.252(a) of the California Rules of Court, judicial notice is taken of Exhibits A-J submitted with Petitioners Everardo Rodriguez's and Judith V. Arellano's motion for judicial notice.

Dated: _____

Presiding Justice

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 5900 Wilshire Boulevard, 12th Floor, Los Angeles, California 90036.

On October 11, 2022, I served the foregoing document described as: **PETITIONERS' MOTION FOR JUDICIAL NOTICE; DECLARATION OF CYNTHIA E. TOBISMAN; [PROPOSED] ORDER** on the parties in this action by serving:

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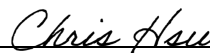
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Executed on October 11, 2022, at Los Angeles, California.

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


Chris Hsu

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **RODRIGUEZ v. FCA
US**

Case Number: **S274625**

Lower Court Case Number: **E073766**

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Title(s) of papers e-served:

Filing Type	Document Title
BRIEF	Petitioners' Opening Brief on the Merits
REQUEST FOR JUDICIAL NOTICE	Petitioners' Motion for Judicial Notice
ADDITIONAL DOCUMENTS	Exhibits in Support of Motion for Judicial Notice Volume 1
ADDITIONAL DOCUMENTS	Exhibits in Support of Motion for Judicial Notice Volume 2
ADDITIONAL DOCUMENTS	Exhibits in Support of Motion for Judicial Notice Volume 3
ADDITIONAL DOCUMENTS	Exhibits in Support of Motion for Judicial Notice Volume 4
ADDITIONAL DOCUMENTS	Exhibits in Support of Motion for Judicial Notice Volume 5
ADDITIONAL DOCUMENTS	Exhibits in Support of Motion for Judicial Notice Volume 6

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

10/11/2022

Date

/s/Chris Hsu

Signature

Tobisman, Cynthia (197983)

Last Name, First Name (PNum)

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