



Supreme Court of California  
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**NEWS RELEASE**

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**FOR IMMEDIATE RELEASE**

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## Summary of Cases Accepted and Related Actions During Week of January 20, 2026

*[This news release is issued to inform the public and the press of cases that the Supreme Court has accepted and of their general subject matter. The statement of the issue or issues in each case set out below does not necessarily reflect the view of the court, or define the specific issues that will be addressed by the court.]*

**#26-6 *Illinois Midwest Ins. Agency LLC v. Workers' Comp. Appeals Bd.*, S294463.**

(B344044; 115 Cal.App.5th 1168; Workers' Compensation Appeals Board; ADJ11532204.) Petition for review after the Court of Appeal annulled and remanded the decision in a Workers' Compensation Appeals Board proceeding. This case presents the following issues: (1) Is there an exception to the exclusivity of utilization review and independent medical review when an employer seeks to deny a form of ongoing, continual treatment that the employer has previously authorized? (2) If an employer has submitted a request for such treatment to utilization review, does the Workers' Compensation Appeals Board have jurisdiction to hear an employee's appeal from an adverse decision denying such treatment?

**#26-7 *People v. Cabrera*, S294373.** (F088474; nonpublished opinion; Tulare County Superior Court; VCF260829A.) Petition for review after the Court of Appeal affirmed an order denying a post-judgment motion in a criminal matter. The court ordered briefing deferred pending decision in *In re Hernandez*, S282186 (#23-261), which presents the following issue: Does the totality of the circumstances establish that defendant meaningfully understood the immigration consequences of her plea?

**#26-8 *People v. Clem*, S294136.** (B337135; nonpublished opinion; Los Angeles County Superior Court; MA070295.) Petition for review after the Court of Appeal affirmed an order granting in part and denying in part a post-judgment motion in a criminal matter. The court ordered briefing deferred pending decision in *People v. Eaton*, S289903 (#25-129), which presents the following issue: May a trial court reimpose a previously imposed upper term sentence under Penal Code section 1172.75, subdivision (d)(4) where the facts underlying one or more aggravating circumstances were neither stipulated

to by the defendant nor found true beyond a reasonable doubt at trial by the jury or by the judge in a court trial (cf. Pen. Code, § 1170, subd. (b)(2); *id.*, § 1172.75, subd. (d)(2))?

**DISPOSITIONS**

Review in the following cases, which were granted and held for *City of San José v. Howard Jarvis Taxpayers Assn.* (2025) 18 Cal.5th 1106, was dismissed:

<p><b>#24-167 <i>City of Escondido v. Fawcett</i>, S286239</b></p>	<p>(D082525; nonpublished opinion; San Diego County Superior Court; 37-2022-00025425-CU-PT-NC)</p>
<p><b>#24-242 <i>City of Oxnard v. Howard Jarvis Taxpayers Association</i>, S287599</b></p>	<p>(B328083; nonpublished opinion; Ventura County Superior Court; 56-2022-00563903-CU-MC-VTA)</p>

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*The Supreme Court of California is the state's highest court and its decisions are binding on all other California state courts. The court's primary role is to decide matters of statewide importance and to maintain uniformity in the law throughout California by reviewing matters from the six districts of the California Courts of Appeal and the fifty-eight county superior courts (the trial courts). Among its other duties, the court also decides all capital appeals and related matters and reviews both attorney and judicial disciplinary matters.*