



Supreme Court of California
350 McAllister Street, San Francisco, CA 94102-4797
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NEWS RELEASE

Contact: [Merrill Balassone](mailto:Merrill.Balassone@courts.ca.gov), 415-865-7740

FOR IMMEDIATE RELEASE

March 13, 2026

Summary of Cases Accepted and Related Actions During Week of March 9, 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.]

#26-31 *California Fair Plan Assn. v. Lara*, S294806. (B336043; 116 Cal.App.5th 869; Los Angeles County Superior Court; 21STCV38060.) Petition for review after the Court of Appeal reversed the judgment in a civil action and remanded with directions. This case presents the following issue: Under Insurance Code section 10091, subdivision (c)(1), may the Insurance Commissioner require the California FAIR Plan Association to offer an expanded homeowners' insurance policy that includes liability coverage with respect to the insured property?

#26-32 *Dreher v. Los Angeles Dept. of Water & Power*, S294899. (B329610; 116 Cal.App.5th 977; Los Angeles County Superior Court; 19STCV07272.) Petition for review after the Court of Appeal affirmed the judgment in a civil action. The court limited review to the following issue: Do the methods adopted by the City of Los Angeles to set water budgets and allocate water supply costs result in tiered water rates that violate the proportionality requirement of article XIII D, section 6, subdivision (b)(3) of the California Constitution?

#26-33 *Sanchez v. Rojas*, S294671. (B338298; nonpublished opinion; Los Angeles County Superior Court; 21STCV41948.) Petition for review after the Court of Appeal affirmed the judgment in a civil action. This case presents the following issue: Should this court overrule or limit its holding in *Elden v. Sheldon* (1988) 46 Cal.3d 267 insofar as that decision declined to recognize claims for negligent infliction of emotional distress or loss of consortium for witnessing a tortious injury inflicted on a cohabitant to whom the plaintiff is neither married nor otherwise closely related?

#26-34 *United States v. Soto*, S294703. (9th Cir. Nos. 23-4072, 24-3903; 163 F.4th 1249; Central District of California; D.C. Nos. 5:22-cr-00021-RGK-1, 2:23-cr-00391-JAK-1.) Request under California Rules of Court, rule 8.548, that this court decide a question of California law presented in a matter pending in the United States Court of Appeals for the Ninth Circuit. The question presented is: When a defendant is charged with possession of a listed controlled substance under California Health and Safety Code section 11378, must the state prove, and must the jury unanimously agree, that the defendant possessed the actual listed controlled substance, and not an analog of that substance as defined under California Health and Safety Code section 11401? Or may the jury convict if it finds the state has proven the defendant possessed *either* the actual controlled substance *or* an analog of that substance, without unanimous agreement as to which?

#26-35 *People v. Camacho*, S294952. (D084857; nonpublished opinion; San Diego County Superior Court; SCN163535.) Petition for review after the Court of Appeal reversed a post-judgment order in a criminal matter and remanded for resentencing. The court ordered briefing deferred pending decision in *People v. Dixon*, S292223 (#25-311), which presents the following issues: (1) May a superior court modify a death judgment under the recall and resentencing procedure in Penal Code section 1172.75? (2) Did the Court of Appeal err in holding that the exclusivity provision of Penal Code section 1509 precludes modification of a death judgment under Penal Code section 1172.75? (3) Did the superior court have jurisdiction to resentence defendant pursuant to Penal Code section 1172.75 when his appeal was pending before this court?

#26-36 *People v. Hedman*, S294792. (B339682; nonpublished opinion; Los Angeles County Superior Court; VA111987.) Petition for review after the Court of Appeal modified and affirmed an order granting in part and denying in part a post-judgment motion in a criminal matter.

#26-37 *People v. Holmes*, S294665. (B341839; nonpublished opinion; Los Angeles County Superior Court; KA102048.) Petition for review after the Court of Appeal modified and affirmed an order granting in part and denying in part a post-judgment motion in a criminal matter.

#26-38 *People v. Iniguez*, S294583. (B336506; nonpublished opinion; Los Angeles County Superior Court; MA041780.) Petition for review after the Court of Appeal modified and affirmed an order granting in part and denying in part a post-judgment motion in a criminal matter.

#26-39 *People v. Jackson*, S294960. (A169670; nonpublished opinion; Alameda County Superior Court; H44259B.) 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.

#26-40 *People v. Ramos*, S295061. (B336304; nonpublished opinion; Los Angeles County Superior Court; MA062453.) 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.

#26-41 *People v. Salgado*, S294994. (F088130; nonpublished opinion; Kern County Superior Court; BF121813A.) Petition for review after the Court of Appeal modified and affirmed an order granting in part and denying in part a post-judgment motion in a criminal matter.

#26-42 *People v. Salstrom*, S295038. (C102342; 117 Cal.App.5th 596; Sacramento County Superior Court; 02F04634.) Petition for review after the Court of Appeal modified and affirmed an order granting in part and denying in part a post-judgment motion in a criminal matter.

The court ordered briefing in *Hedman*, *Holmes*, *Iniguez*, *Jackson*, *Ramos*, *Salgado*, and *Salstrom* 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))?

#26-43 *People v. Williams*, S295057. (C100503; nonpublished opinion; Sacramento County Superior Court; 20FE008519.) Petition for review after the Court of Appeal affirmed a judgment of conviction of criminal offenses and remanded for further proceedings. The court ordered briefing deferred pending decision in *People v. Orozco*, S293587 (#25-346), which presents the following issue: Is defendant's indeterminate sentence for attempted murder unauthorized under Penal Code section 664, subdivision (a) because the prosecutor did not allege in the information that the attempted murder was willful, deliberate, and premeditated?

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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.