



Supreme Court of California
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NEWS RELEASE

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FOR IMMEDIATE RELEASE

September 19, 2025

Summary of Cases Accepted and Related Actions During Week of September 15, 2025

[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.]

#25-296 *People v. Caddell*, S292107. (D085600; nonpublished opinion; Riverside County Superior Court; RIF130895.) Review ordered on the court's own motion after the Court of Appeal reversed an order denying a post-judgment motion in a criminal matter and remanded for further proceedings.

#25-297 *People v. Luna*, S292469. (B339713; nonpublished opinion; Los Angeles County Superior Court; VA076361.) Petition for review after the Court of Appeal affirmed an order denying a post-judgment motion in a criminal matter.

#25-298 *People v. Ortega*, S292070. (G063201; 111 Cal.App.5th 1252; Orange County Superior Court; 00CF1418.) Petition for review after the Court of Appeal affirmed an order denying a post-judgment motion in a criminal matter.

The court ordered briefing in *Caddell*, *Luna*, and *Ortega* deferred pending decision in *People v. Munoz*, S290828 (#25-209), which presents the following issue: Is a juvenile homicide offender sentenced to 50 years to life in prison entitled to recall and resentencing under Penal Code section 1170, subdivision (d)(1) on the ground that the sentence is the functional equivalent of life imprisonment without parole?

#25-299 *CRST Expedited, Inc. v. Superior Court*, S292005. (F088569; 112 Cal.App.5th 872; Fresno County Superior Court; 19CECG03266.) Petition for review after the Court of Appeal denied a petition for writ of mandate. The court ordered briefing deferred pending decision in *Leeper v. Shipt, Inc.*, S289305 (#25-91), which presents the following issues: (1) Does every Private Attorneys General Act (Lab. Code, § 2698 et seq.) (PAGA) action necessarily include both individual and non-individual

PAGA claims, regardless of whether the complaint specifically alleges individual claims?
(2) Can a plaintiff choose to bring only a non-individual PAGA action?

#25-300 *People v. Mitts*, S292366. (F086887; nonpublished opinion; Stanislaus County Superior Court; 1417651.) 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))? and pending decision in *People v. Mitchell*, S277314 (#22-305), which presents the following issue: Does Senate Bill No. 567 (Stats. 2021, ch. 731), which limits a trial court's discretion to impose upper term sentences, apply retroactively to defendants sentenced pursuant to stipulated plea agreements?

#25-301 *Pelascini v. Airstream, Inc.*, S291386. (A169686; nonpublished opinion; Solano County Superior Court; CU2301803.) Petition for review after the Court of Appeal reversed an order in a civil action and remanded with directions. The court ordered briefing deferred pending decision in *Lathrop v. Thor Motor Coach, Inc.*, S287893 (#25-12), which presents the following issues: (1) Where a party alleges that enforcement of a forum selection clause would result in a waiver of the party's unwaivable statutory rights, what is the showing necessary to enforce (or avoid enforcement) of such a clause, and which party bears the burden of proof on the issue? (2) Under what circumstances, if any, does a stipulation to apply California law in the selected forum rebut an allegation that enforcement of a forum selection clause would result in a waiver of a party's unwaivable statutory rights? (3) If enforcement of a choice of law clause would result in a waiver of a party's unwaivable statutory rights, is the choice of law clause severable from the remainder of the agreement?

#25-302 *People v. Silva*, S292409. (B337341; nonpublished opinion; Los Angeles County Superior Court; NA103759.) 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 *People v. Rhodius* (2025) 17 Cal.5th 1050, was dismissed:

#25-86 <i>People v. Butler</i>, S289486	(E083059; nonpublished opinion; Riverside County Superior Court; INF1801578)
#25-258 <i>People v. Green</i>, S291453	(C101491; nonpublished opinion; Sacramento County Superior Court; 18FE006985)
#25-232 <i>People v. Rosales</i>, S291053	(E083243; nonpublished opinion; Riverside County Superior Court; RIF128141)
#24-228 <i>People v. Varelas</i>, S287259	(G063291; nonpublished opinion; Riverside County Superior Court; RIF1300400)
#24-56 <i>People v. Wyatt</i>, S283393	(C098249; nonpublished opinion; Shasta County Superior Court; 07F1009)

The following case was transferred for reconsideration in light of *People v. Rhodius* (2025) 17 Cal.5th 1050:

#25-33 <i>People v. Deberry</i>, S288725	(E082857; nonpublished opinion; Riverside County Superior Court; RIF1208861)
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STATUS

In the following cases, in which briefing was previously deferred pending decision in *People v. Rhodius* (2025) 17 Cal.5th 1050, the court ordered briefing deferred pending decision in *People v. Espino*, S286987 (#24-209), which presents the following issue: Is a defendant entitled to resentencing under Penal Code section 1172.75 when the judgment in the defendant's criminal case includes a prior-prison-term enhancement that was imposed but for which punishment was stricken?

#25-94 <i>People v. Archuleta</i>, S289560	(E082960; nonpublished opinion; Riverside County Superior Court; RIF1605083)
#25-134 <i>People v. Bunch</i>, S289999	(G063547; nonpublished opinion; Orange County Superior Court; 96WF0422)
#25-122 <i>People v. Hawkins</i>, S289811	(H051642; nonpublished opinion; Monterey County Superior Court; SC952407A)
#25-228 <i>People v. Hughes</i>, S290868	(E083053; nonpublished opinion; Riverside County Superior Court; ICR15933)

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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.