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**Exempt from fees –
Gov. Code, § 6103**

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF PLACER

11
12 **CITY OF LINCOLN, a California**
13 **municipal corporation, CITY OF**
14 **LINCOLN, by and for the People of the**
State of California,

15 Plaintiff and Petitioner,

16 v.

17 **THE GATHERING INN, a California**
18 **public benefit non-profit corporation;**
19 **CALIFORNIA DEPARTMENT OF**
20 **SOCIAL SERVICES, a California state**
21 **agency, HORNE LLP, a Delaware limited**
22 **liability partnership, and DOES 1 through**
23 **15 inclusive,**

24 Defendants and
25 Respondents.

Case No. S-CV-0053711

**DEFENDANT AND RESPONDENT
CALIFORNIA DEPARTMENT OF
SOCIAL SERVICES' REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
DEMURRER TO PLAINTIFF AND
PETITIONER CITY OF LINCOLN'S
AMENDED COMPLAINT/PETITION**

Date: February 11, 2025
Time: 8:25 a.m.
Dept: 42
Judge: The Honorable Trisha J. Hirashima

Trial Date: Not set
Action Filed: September 30, 2024

1 Defendant and respondent California Department of Social Services (CDSS) requests
2 judicial notice of the existence and existence of the content of a single document: a page from
3 CDSS’s official government website titled “Letters and Notices,” which lists and includes links to
4 All-County Letters (ACLs) and other instructions dating as far back as 1974 that CDSS has issued
5 in connection with programs it administers, including, in addition to ACLs: All County
6 Information Notices (ACINs), All County Welfare Director Letters (ACDWLs), All Tribal
7 Leaders Letters (ATLLs), Child Care Bulletins (CCBs), County Fiscal Letters (CFLs), County
8 Fiscal Information Notices (CFINs), and Notices of Form Changes (GEN 127s). A screenshot of
9 CDSS’s “Letters and Notices” webpage is attached hereto as Exhibit A, and is available at
10 <https://www.cdss.ca.gov/inforesources/letters-and-notice> (last visited December 20, 2024).

11 The Court may take judicial notice of the existence of the content of CDSS “Letters and
12 Notices” webpage, because the webpage constitutes an “official act of the executive branch” of
13 the State of California and a record whose existence “is not subject to reasonable dispute and is
14 capable of immediate and accurate determination by resort to reliable sources.” (Evid. Code,
15 § 452, subds. (c) and (h); see *Shaw v. People ex rel. Chiang* (2009) 175 Cal.App.4th 577, 606 and
16 fn. 10 [taking judicial notice of content of government website pursuant to Evidence Code section
17 452, subdivisions (c) and (h), in connection with interpretation of terms of statute], disapproved
18 on other grounds by *County of San Diego v. Com. on State Mandates* (2018) 6 Cal.5th 196, 214,
19 fn. 4; *Ragland v. U.S. Bank Nat. Assn.* (2012) 209 Cal.App.4th 182, 193 [taking judicial notice of
20 existence of websites].)

21 Judicial notice is mandatory if a party requests it and (1) gives the adverse parties sufficient
22 notice of the request to enable the adverse parties to prepare to respond to the request; and (2)
23 furnishes the court with enough information to enable the court to take judicial notice. (Evid.
24 Code, § 453, subds. (a) & (b).) This request and CDSS’s demurrer provide notice to plaintiff City
25 of Lincoln (City) and the City has a full opportunity to respond within the same time as it has to
26 file its opposition to CDSS’s demurrer. CDSS also, with this request, provides the Court and the
27 City with enough information to enable the court to take judicial notice, including a copy of the
28 “Letters and Notices” webpage, the link at which the page may be located and viewed on the

1 internet, and points and authorities in support of its request. As the requirements under Evidence
2 Code section 453, therefore, are met, judicial notice of the webpage is mandatory.

3 The Court, therefore, should take judicial notice of the existence and existence of the
4 contents of the CDSS's "Letters and Notices" webpage, a screenshot of which is attached hereto
5 as Exhibit A.

6 Dated: December 20, 2024

Respectfully submitted,

7
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10
11
12 /s/ Joshua Sondheimer
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15 California Department of Social Services

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Exhibit A



Letters and Notices

- [All County Information Notices \(ACINs\)](#)
- [All County Letters \(ACLs\)](#)
- [All County Welfare Director Letters \(ACWDL\)](#)
- [All Tribal Leaders Letters \(ATLL\)](#)
- [Child Care Bulletins \(CCB\)](#)
- [County Fiscal Letters \(CFLs\)](#)
- [County Fiscal Information Notices \(CFIN\)](#)
- [Notice Of Forms Changes \(GEN 127s\)](#)

Other Letters and Correspondence

- [Individual County Letters](#)
- [Federal Funding Provisions](#)
- [County Letter Flow Chart](#)

The Letters and Notices on this site are in Adobe Portable Document Format (PDF).



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