1 2 3 4 5 6 7	ROB BONTA Attorney General of California BENJAMIN G. DIEHL Supervising Deputy Attorney General JOSHUA N. SONDHEIMER (SBN 152000) JOSE J. RAMOS (SBN 324066) ANTHONY C. PINGGERA (SBN 320206) Deputy Attorneys General 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004 Telephone: (415) 510-4420 Fax: (415) 703-5480 E-mail: Joshua.Sondheimer@doj.ca.gov	
8	Attorneys for Defendant and Respondent California Department of Social Services	Exempt from fees – Gov. Code, § 6103
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
10	COUNTY OF PLACER	
11		
12 13	CITY OF LINCOLN, a California municipal corporation, CITY OF	Case No. S-CV-0053711
14	LINCOLN, by and for the People of the State of California,	DEFENDANT AND RESPONDENT CALIFORNIA DEPARTMENT OF
15	Petitioner and Plaintiff,	SOCIAL SERVICES' REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF
16	v.	DEMURRER TO SECOND AMENDED COMPLAINT/PETITION
17	THE CATHEDING INN - C-126	D.4 O.4.17. 2025
18	THE GATHERING INN, a California public benefit non-profit corporation; CALIFORNIA DEPARTMENT OF	Date: October 7, 2025 Time: 8:30 a.m. Dept: 42
19	SOCIAL SERVICES, a California state agency, HORNE LLP, a Delaware limited	Judge: The Honorable Trisha J. Hirashima
20	liability partnership, and DOES 1 through 15 inclusive,	Trial Date: Not set Action Filed: September 30, 2024
21 22	Respondents and Defendants.	
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INTRODUCTION

Defendant and respondent CALIFORNIA DEPARTMENT OF SOCIAL SERVICES (CDSS or Department) requests judicial notice of the existence and existence of the content of CDSS's "Letters and Notices" webpage, which lists All-County Letters and similar instruction the Department has issued, in support of its demurrer to petitioner and plaintiff the City of Lincoln's (City) second amended complaint/petition (SAP): A screenshot of the principal page of the webpage is attached hereto as **Exhibit A**, and the webpage is publicly available at https://www.cdss.ca.gov/inforesources/letters-and-notices (last visited August 21, 2025).

DISCUSSION

I. THE COURT MAY TAKE JUDICIAL NOTICE OF CDSS'S LETTERS AND NOTICES WEBPAGE

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

CDSS's Letters and Notices webpage is relevant because the City contends that the Request for Applications (RFA) and constitutes a "regulation" pursuant to Welfare and Institutions Code section 18999.97, subdivision (k). (See SAP ¶ 196(1).) That provision authorizes CDSS to implement and administer the CCE Program through "all-county letters and similar instruction" that shall have the same "force and effect" as regulations. CDSS disputes the City's contention that the RFA constitutes a regulation or that it otherwise has regulatory effect. CDSS's Letters and Notices webpage identifies the types of "all-county letters and similar instruction" CDSS has

issued—including All-County Letters (ACLs), All County Information Notices (ACINs), All County Welfare Director Letters (ACDWLs), All Tribal Leaders Letters (ATLLs), Child Care Bulletins (CCBs), County Fiscal Letters (CFLs), County Fiscal Information Notices (CFINs), and Notices of Form Changes (GEN 127s)—which generally provide administrative guidance to counties and other entities that implement programs administered by CDSS. Additionally, the webpage includes links to such letters and instructions, organized by year dating as far back as 1974 (ACLs). CDSS's Letters and Notices webpage therefore can assist the Court in evaluating the parties' respective arguments on this issue.

II. BECAUSE CDSS PROVIDES SUFFICIENT INFORMATION TO SUPPORT ITS REQUEST, JUDICIAL NOTICE OF THE DOCUMENTS REQUESTED IS MANDATORY

Judicial notice is mandatory if a party requests it and (1) gives the adverse parties sufficient notice of the request to enable the adverse parties to prepare to respond to the request; and (2) furnishes the court with enough information to enable the court to take judicial notice. (Evid. Code, § 453, subds. (a) & (b).) This request and the Department's demurrer provide notice to the City, and the City has a full opportunity to respond within the same time as it has to file its oppositions to the Department's demurrer. The Department also, with this request, provide the Court and the City with sufficient information to enable the Court to take judicial notice of the requested documents, including a copy of and/or link to the document, links to the webpages at which the documents may be located and viewed on the internet, and points and authorities in support of its request. As the requirements under Evidence Code section 453, therefore, are met, judicial notice of the requested documents is mandatory.

CONCLUSION

For the foregoing reasons, the Court should take judicial notice of the existence and existence of the content of CDSS's "Letters and Notices" webpage, for which CDSS provides a link above and attaches a copy at Exhibit A to this request.

1	Dated: August 26, 2025	Respectfully submitted,
2		ROB BONTA Attorney General of California BENJAMIN G. DIEHL
3 4		Supervising Deputy Attorney General
5		
6		/s/ Joshua Sondheimer
7		JOSHUA N. SONDHEIMER JOSE J. RAMOS ANTHONY C. PINGGERA
8		ANTHONY C. PINGGERA Deputy Attorneys General Attorneys for Defendant and Respondent California Department of Social Services
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EXHIBIT A





Department of Social Services



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Letters/Regulations

Forms/Brochures

Fiscal/Financial

Data Portal

Letters/Regulations Letters and Notices

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).



Subscribe to Letters and Notices

Use the subscribe buttons below to be notified of changes and publications to specific programs.

Adult Programs

Cash Aid and Food Assistance Programs

Child Welfare Programs

Housing and Homelessness Program

Child Care and Development Programs

Special Announcements