

GIBSON, DUNN & CRUTCHER LLP  
THEANE EVANGELIS, SBN 243570  
tevangelis@gibsondunn.com  
MARCELLUS MCRAE, SBN 140308  
mmcrae@gibsondunn.com  
KAHN A. SCOLNICK, SBN 228686  
kscolnick@gibsondunn.com  
BRADLEY J. HAMBURGER, SBN 266916  
bhamburger@gibsondunn.com  
ANGELIQUE KAOUNIS, SBN 209833  
akaounis@gibsondunn.com  
PATRICK J. FUSTER, SBN 326789  
pfuster@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, California 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

HYDEE FELDSTEIN SOTO, SBN 106866  
VALERIE L. FLORES, SBN 138572  
ARLENE N. HOANG, SBN 193395  
JESSICA MARIANI, SBN 280748  
200 North Main Street, City Hall East, 6th Floor  
Los Angeles, California 90012  
Telephone: 213.978-7508  
Facsimile: 213.978.7011  
Email: arlene.hoang@lacity.org

*Attorneys for Defendant*  
**CITY OF LOS ANGELES**

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS,  
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal  
entity, et al.,

Defendant.

CASE NO. 2:20-cv-02291 DOC (KES)

Honorable David O. Carter,  
United States District Judge

**RESPONSE TO THE ALLIANCE'S  
REQUEST FOR JUDICIAL  
NOTICE**

Action Filed: March 10, 2020

1 The Alliance has asked this Court to take judicial notice of a long list of  
2 documents filed in federal courts as well as records from government agencies.  
3 Dkt. 1087. As with the Alliance’s request for judicial notice earlier this year, Dkt. 961,  
4 the City agrees that the *existence* of documents filed in federal district courts and records  
5 from government agencies are generally subject to judicial notice under Federal Rule of  
6 Evidence 201. But to the extent the Alliance asks the Court to take judicial notice of  
7 these documents for the *truth* of the matters they assert and in order to resolve disputed  
8 issues of fact, the City objects.

9 The Court may take judicial notice of facts “not subject to reasonable dispute,”  
10 Fed. R. Evid. 201(b), and no one could reasonably dispute that the documents in the  
11 Alliance’s request exist. But the Court may take judicial notice only of the fact that  
12 these documents were filed in court or are available from the City and other public  
13 agencies. For example, in *Lee v. City of Los Angeles*, 250 F.3d 668, 689–90 (9th Cir.  
14 2001), the district court took judicial notice of a publicly filed document and a hearing  
15 transcript. The Ninth Circuit explained that it was proper to “take judicial notice of the  
16 *fact* of the” hearing and document. *Id.* But the district court erred by taking judicial  
17 notice of “*disputed* facts stated in public records.” *Id.* at 690; *see also Khoja v. Orexigen*  
18 *Therapeutics, Inc.*, 899 F.3d 988, 999 (9th Cir. 2018) (“Just because the document itself  
19 is susceptible to judicial notice does not mean that every assertion of fact within that  
20 document is judicially noticeable for its truth.”).

21 Here, the City may dispute much of which is said in the documents that the  
22 Alliance claims are subject to judicial notice. Given that reality, the Court may properly  
23 take judicial notice of the fact that the assessment and other documents exist and were  
24 filed in these proceedings, but the Court may not rely on judicial notice to conclude that  
25 anything said in those documents is true.

DATED: December 1, 2025

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Theane Evangelis  
Theane Evangelis

GIBSON, DUNN & CRUTCHER LLP  
THEANE EVANGELIS, SBN 243570  
tevangelis@gibsondunn.com  
MARCELLUS McRAE, SBN 140308  
mmcrae@gibsondunn.com  
KAHN SCOLNICK, SBN 228686  
kscolnick@gibsondunn.com  
BRADLEY J. HAMBURGER, SBN 266916  
bhamburger@gibsondunn.com  
ANGELIQUE KAOUNIS, SBN 209833  
akaounis@gibsondunn.com  
PATRICK J. FUSTER, SBN 326789  
pfuster@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, California 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

HYDEE FELDSTEIN SOTO, SBN 106866  
VALERIE L. FLORES, SBN 138572  
ARLENE N. HOANG, SBN 193395  
JESSICA MARIANI, SBN 280748  
200 North Main Street, City Hall East, 6th  
Floor  
Los Angeles, California 90012  
Telephone: 213.978-7508  
Facsimile: 213.978.7011  
Email: arlene.hoang@lacity.org

*Attorneys for Defendant*  
*CITY OF LOS ANGELES*