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Supreme Court of California
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S266003

IN THE SUPREME COURT OF CALIFORNIA

MIKAYLA HOFFMANN, a Minor, etc.,
Plaintiff and Appellant,

v.

CHRISTINA M. YOUNG et al.,
Defendants and Respondents.

AFTER A DECISION BY THE COURT OF APPEAL, SECOND APPELLATE DISTRICT, DIVISION SIX
CASE NO. B292539

REPLY TO ANSWER TO PETITION FOR REVIEW

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REPLY TO ANSWER TO PETITION FOR REVIEW

INTRODUCTION

In her answer to the petition for review, plaintiff Mikayla Hoffmann does not dispute that the petition raises an issue of statewide importance on which lower courts are divided: whether an invitation by a nonlandowner, made without the landowner's knowledge or express approval, can strip the landowner of recreational use immunity under Civil Code section 846 (section 846). The split decision below intensifies this conflict, creates a new and misguided presumption of agency, and further unsettles the law of premises liability for a broad range of recreational activities on private and federal land throughout California.

Mikayla nonetheless urges this Court to deny the petition. Attempting to frame the opinion in the narrowest possible terms, she asserts that the majority's holding neither creates nor exacerbates any conflict because it is limited to invitations by children who live at home with their landowner parents. But the majority's reasoning is not so easily cabined. The majority rejected the proposition—established in a string of prior cases—that the express invitation exception covers *only* invitations made or expressly authorized by the landowner. In so doing, the majority relies on an implied agency rationale that purports to draw from general principles of agency law. While the majority applied its logic to the specific facts of this case, the same logic applies to countless other situations—from servicemembers who have implied authority to invite friends and family onto their base for an air show (see generally *Ravell v. U.S.* (9th Cir. 1994)

22 F.3d 960 (*Ravell*)) to companies that have implied authority to invite their employees to a company picnic (see generally *Johnson v. Unocal Corp.* (1993) 21 Cal.App.4th 310 (*Johnson*)).

By construing the majority's decision in artificially narrow terms, Mikayla sidesteps most of the case law discussed in the petition, which shows that there is a preexisting split of authority on how to interpret section 846's express invitation exception. The decision below exacerbates that conflict, sowing even greater confusion for lower courts and property owners throughout the state.

Rather than address these conflicts, Mikayla defends the majority's holding on the merits, arguing that Gunner Young's invitation was effectively an invitation by the landowners because Gunner was acting as his parents' implied agent when he invited Mikayla to the property. But this agency argument only highlights why review should be granted. Like the majority, Mikayla invokes general principles of agency law, and her argument demonstrates why the majority's reasoning is not limited to children who live with their parents. Furthermore, her assertion that section 846 should be harmonized with the law of agency shows why there are important, unsettled questions of law that warrant review.

Finally, Mikayla discusses miscellaneous facts and theories that go beyond the Court of Appeal's opinion and have little or no bearing on the issue presented in this petition. At bottom, nothing in Mikayla's answer rebuts our showing that this case is an ideal vehicle to decide the issue presented.

LEGAL ARGUMENT

I. The Court of Appeal's decision aggravates the split of authority identified in the petition.

Mikayla contends that the majority's decision does not implicate the issue presented in the petition. According to Mikayla, the majority's decision is limited to "the efficacy of an invitation extended by a living-at-home child of the landowners." (APFR 7.) She asserts there is no conflict on that narrow question because the majority's holding aligns with *Calhoon v. Lewis* (2000) 81 Cal.App.4th 108 (*Calhoon*), another decision involving an invitation by a child who lived with his parents. (APFR 9.)

The Court of Appeal's decision here is part of the broader split of authority described in the petition, and it aggravates that conflict. Although the majority frames its ultimate holding in terms of the facts before it—a child living with his parents—the majority reached that conclusion by rejecting the dissent's position that "only the landowner may issue the invitation unless the landowner expressly authorizes an agent do so." (Dis. typed opn. 3.)

The majority rejected the dissent as "a slave to literalism" for insisting that an *implied* authorization does not trigger the plain language of the express invitation exception. (Typed opn. 9.) Moreover, the majority left no doubt it was rejecting the cases the dissent cited to support that contrary view. (See dis. typed opn. 4–5, citing *Wang v. Nibbelink* (2016) 4 Cal.App.5th 1, 32 (*Wang*), *Jackson v. Pacific Gas & Elec. Co.* (2001) 94 Cal.App.4th

1110, 1116 (*Jackson*), *Ravell*, *supra*, 22 F.3d at p. 963, and *Johnson*, *supra*, 21 Cal.App.4th at p. 317.) As the dissent recognized, those cases conflict with the majority's approach to the issue presented, even though those cases did not involve invitations by children living at home with their parents. And as explained below, the majority's implied agency rationale purports to rest on general principles of agency law, not concepts specific to parents and children. (See typed opn. 5, 9–10; part II.B., *post*.)

Like the Court of Appeal, this Court *could* elect to address the specific issue of invitations by children who live with their parents. But to reach that issue, the Court would first need to answer the broader, more important question on which the lower courts are divided: whether implied authorization to issue an invitation can trigger section 846's express invitation exception.

II. Mikayla's answer demonstrates why this Court should grant review.

A. Mikayla does not dispute that there is a split of authority on the issue presented.

Because of her cramped reading of the majority's decision, Mikayla largely fails to address the case law discussed in the petition. As a result, she does not in fact deny that the cases are in conflict, nor does she rebut the petition's showing that the conflict warrants review.

For example, the Court of Appeal's decisions in *Johnson*, *supra*, 21 Cal.App.4th 310 and *Wang*, *supra*, 4 Cal.App.5th 1 appear only in passing in Mikayla's answer as part of a quotation from another opinion. (APFR 17.) Mikayla offers no explanation

why those cases—which emphasize the need for a direct, personal invitation by the landowner—can be reconciled with the majority's decision in this case. Similarly, the answer mentions *Jackson*, *supra*, 94 Cal.App.4th 1110, but only to make an unrelated point about the purpose of the invitation. (APFR 14–15, fn. 6.) And while the answer notes that *Ravell*, *supra*, 22 F.3d 960 suggested that a landowner could delegate authority to invite others to its property (APFR 15–16), the answer fails to address *Ravell*'s main point—that any such delegation must be *express* and must authorize an invitation *on the landowner's behalf* (PFR 6, 14, 19; accord, dis. typed opn. 3 [exception triggered if the landowner issues the invitation or "expressly authorizes an agent to do so"]; *Wang*, at p. 32 [exception triggered only if the guest was "personally select[ed]" by the landowner]).

The answer features a long quotation from *H.S. by and through Parde v. United States* (S.D.Cal., Aug. 13, 2019, No. 3:17-cv-02418-BTM-KSC) 2019 WL 3803804 (APFR 16–18), but its reliance on *H.S.* further demonstrates why review is necessary. First, by relying on *H.S.* and arguing that it arose "in a context analogous to that presented here" (APFR 16), Mikayla implicitly concedes that the issue in this case is *not* limited to invitations by children who live with their parents and in fact implicates a broad range of settings, including Federal Tort Claims Act cases. Second, *H.S.* spotlights the lack of "prior decisions that directly define what constitutes a 'direct, personal' request or what it means for a landowner to 'personally select' a person to invite."

(*H.S.*, at p. *5.) This petition presents this Court with a chance to provide that much-needed guidance.

Finally, Mikayla agrees that the majority's decision aligns with *Calhoon*, *supra*, 81 Cal.App.4th 108. (See APFR 9; see also PFR 17.) As such, there is no reason to let the issue percolate, as the cases already present a well-developed split of authority. Nor could this Court fully resolve the conflict by depublishing the Court of Appeal's opinion, as *Calhoon* would still remain on the books.

In sum, Mikayla's treatment of the case law cited in the petition only confirms that the lower courts are indeed divided. This Court should grant review to clarify the correct approach to invitations by nonlandowners, reverse the majority's decision, and disapprove *Calhoon*.

B. Mikayla's argument about agency law highlights the need for review.

Mikayla devotes much of her answer to defending the majority's implied agency rationale. According to Mikayla, "[t]he question . . . is whether under California law the holding by the Court below (and in *Calhoon*) of implied agency is appropriate." (APFR 18.) She argues that "the settled law of agency" is incorporated into section 846 (APFR 12) and asserts that the majority's "reliance on 'common sense' [to infer implied agency] is justified and beyond dispute" (APFR 20). Mikayla's emphasis on the law of agency highlights the need for review.

For one thing, Mikayla's agency argument illustrates why the majority's reasoning is not limited to cases involving children

who live at home with their parents. To defend the majority's decision, Mikayla purports to rely on general principles of agency law—just as the majority did. (See APFR 9, 12, 18–22; typed opn. 5, 9–10.) If allowed to stand, the majority's holding that section 846 incorporates general agency principles, and that *implied* authority to invite others is enough to trigger the express invitation exception, will inevitably extend to any number of situations in which the landowner implicitly allows someone to invite others onto the property.

In *Ravell*, for example, servicemembers had implied authority to invite family to their base for the air show. (See *Ravell*, *supra*, 22 F.3d at p. 961.) Likewise, in *Johnson*, the company that reserved a park for an annual company picnic had implied authority to host its employees at the picnic. (See *Johnson*, *supra*, 21 Cal.App.4th at p. 312.) In *Wang*, the landowner permitted the operator of a "Wagon Train" attraction to use its land for camping and thereby impliedly authorized the operator to invite guests, including the plaintiff, to come onto its land. (See *Wang*, *supra*, 4 Cal.App.5th at pp. 6–7.) In short, each of these key cases addressing the express invitation exception involved a nonlandowner who, under the Court of Appeal's logic in this case, had "implied authorization" to invite others to the property. But those cases all recognized that a landowner *merely permitting* someone to come onto the property does not trigger the exception; there must be an express invitation from the landowner or made *at the landowner's behest*. (See § 846,

subd. (d)(3) [persons who are "merely permitted to come upon the premises by the landowner" cannot invoke the exception].)

Thus, while the Court of Appeal limited its new presumption of implied agency to children living at home with their parents (a holding that by itself warrants review),[1] the court's broader conclusion that *implied authorization* can trigger section 846's express invitation exception is not so limited. Agency law is not restricted to children who live at home with their parents, and no limiting principle confines the majority's implied authority reasoning to that situation.

Mikayla's agency argument also confirms that there are important and unsettled questions on the merits. She contends that the majority "merely harmonized" section 846 with statutes that codify the common law of agency. (APFR 9; see APFR 20–21.) She points out, for example, that statutes should be interpreted in light of the " ' " 'entire scheme of law,' " ' " rather than in isolation, implying that the Legislature meant to incorporate agency law into section 846. (APFR 21.)

Even if Mikayla is right that section 846 should be harmonized with agency law, it does not follow that it must be harmonized in the way Mikayla suggests. The petition agreed that the express invitation exception may cover invitations extended by certain agents of the landowner but explained that the exception should apply only when the landowner *expressly*

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[1] Mikayla's answer does not deny that the majority's decision to create the new presumption of agency conflicts with broader principles of agency law. (See PFR 20–21.)

authorizes an agent to convey an invitation to a person the landowner selects. (PFR 17–21.) That approach is consistent with the language of the statute: recreational users "merely permitted" onto the property but not "expressly invited . . . by the landowner" fall outside the exception. (§ 846, subd. (d)(3).) Unless the landowner expressly authorizes an agent to extend the invitation, the landowner has "merely permitted" that person to enter, and therefore the exception cannot apply.[2] For instance, the federal government allowed the servicemember in *Ravell* to invite his mother to an air show, but his invitation did not trigger the exception because the government did not *expressly* authorize it. (See PFR 19, citing *Ravell*, *supra*, 22 F.3d at pp. 961–963 & fn. 3.)

Thus, Mikayla's (misguided) invocation of general agency principles provides a compelling reason to grant review, not deny it. This case presents a valuable opportunity for this Court to clarify *how* the express invitation exception should be harmonized with the law of agency. And as Mikayla's answer shows, she is well positioned to brief that issue on the merits if this Court grants review.

[2] Because a recreational user may be allowed onto property without being expressly invited by the landowner, it is irrelevant that Mikayla was not trespassing when she entered the property. (See APFR 21–22.) As the statute makes clear, Mikayla could be an invitee without being an invitee of Gunner's parents.

III. This case is an ideal vehicle to decide the issue presented.

The parties agree on the key facts: Gunner's parents did not invite Mikayla onto their property, and they did not expressly authorize Gunner to do so. (PFR 7–8.) Indeed, Gunner's parents had never met or seen Mikayla before the day of the accident, and they did not know Gunner was inviting her to the property that day. (PFR 8.) As the petition explained, these undisputed facts make this case an ideal vehicle to decide the issue presented. The majority's implied agency rationale is the only possible basis for its holding, and the validity of that rationale is a pure question of law. (PFR 23–24.) Mikayla appears to suggest that this case is a poor vehicle to resolve the issue presented, but all of her arguments on this point lack merit.

First, Mikayla observes that Gunner expressly invited her to his parents' property. (APFR 8, 10, fn. 4, 19–20.) That undisputed fact is an essential component of the issue presented, not a reason to deny review. Everyone agrees that Gunner expressly invited Mikayla to the property; the question is whether Gunner's invitation strips *his parents* of recreational use immunity. (See PFR 5, 8, 24.)

Second, Mikayla identifies various facts that the Court of Appeal omitted from its opinion. (APFR 10–12.) But Mikayla chose not to petition for rehearing, so she cannot oppose review based on those omitted facts. (See Cal. Rules of Court, rule 8.268(a)(1) [any party may petition for rehearing]; *Hernandez v. Hillsides, Inc.* (2009) 47 Cal.4th 272, 283, fn. 3 [rejecting factual contention by parties that prevailed in the Court of Appeal

because they "did not seek rehearing or modification on this or any other factual point, and are barred from complaining about it now"].)

What's more, Mikayla's additional factual assertions are irrelevant to the issue presented. According to Mikayla, those facts would "support the Court of Appeal's finding of implied, or ostensible agency." (APFR 10.) But the Court of Appeal did not find ostensible agency, which arises when a principal causes a third party to *mistakenly* "believe another to be his agent who is not really employed by him." (Civ. Code, § 2300.)[3] The Court of Appeal found only "implied agency," which is not a recognized form of agency under California law, and the majority's reliance on that novel concept is yet another way in which its decision conflicts with settled principles of agency law. (See PFR 20–21.) At any rate, the issue presented is not whether an implied agency was created in this case, but whether implied agency is enough to trigger the express invitation exception. If the majority is correct that implied agency is sufficient and can be inferred from the fact that Gunner lived on his parents' property, more evidence of implied agency would be superfluous. And if the majority is wrong about implied agency, none of that evidence matters because none of it shows that Gunner's parents made or expressly authorized the invitation.

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[3] We explained below why there is no evidence of ostensible agency. (RB 42–43.) None of Mikayla's additional factual assertions demonstrate that Gunner was an ostensible agent, which is presumably why the Court of Appeal did not adopt Mikayla's ostensible agency argument.

Third, Mikayla points out that the express invitation exception may apply even if the plaintiff was not invited to the property for the specific purpose of engaging in recreation. (APFR 14–15; see typed opn. 7.) That proposition is not relevant to the issue presented, and defendants do not challenge that proposition in this petition. (See APFR 15, fn. 6.) But if anything, Mikayla's argument shows why trial courts need a clear rule for deciding when an invitation by a nonlandowner falls within the exception. If the exception can apply whether or not the plaintiff was invited to the property for a recreational purpose, the *source* of the invitation is all the more significant. (See PFR 22.)[4]

No matter the purpose behind Gunner's invitation, the parties agree that Mikayla entered and used the property for a recreational purpose. (See PFR 24 [citing trial court record and Mikayla's appellate briefing]; typed opn. 1 [Mikayla was injured "[w]hile riding her motorcycle on a motocross track"].) As a result, Gunner's parents owed no duty of care to Mikayla unless one of the statutory exceptions applies. (See § 846, subd. (a).) Mikayla makes no claim that Gunner's parents charged her consideration to enter the property (see § 846, subd. (d)(2)), and she does not challenge the jury's finding that Donald Young did

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[4] Mikayla notes that defendants argued below that Gunner was not allowed to invite friends to use the motocross track. (APFR 13–14, 18.) Defendants did not assert that argument in the petition because they are not challenging the majority's holding that an invitation need not be for the specific purpose of engaging in recreation in order to trigger the exception.

not engage in willful or malicious conduct (see § 846, subd. (d)(1); 3 CT 705). As a result, Donald's immunity hinges on whether the express invitation exception applies. And as the petition explained, whether the exception applies based on these undisputed facts is a question of law that will make the difference between affirmance and reversal of the judgment.

CONCLUSION

For all the foregoing reasons, this Court should grant the petition for review.

January 7, 2021

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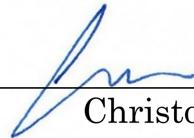
By: 
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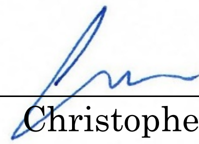

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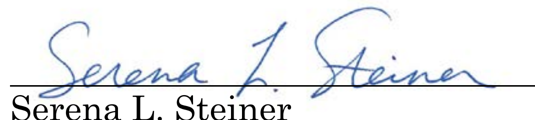

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