S253783

No Stay; Response Tolled CCP §418.10
Master Cal. UD - Jury Trial Demanded; Not Yet Set

IN THE SUPREME COURT OF CALIFORNIA

Edward Stancil,[1]
Defendant/Petitioner,

v.

Superior Court of California, County of San Mateo,
Respondent;

City of Redwood City,
Real Party in Interest.

Review of Decision by the Court of Appeal - 1st Appellate District, Division Two
#A156100; Super. Ct. Case #18UDL00903

PETITIONER'S REPLY BRIEF

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[1] *Stancil v. Super. Ct. (Redwood City)* S253783 is lead case of 11 related UDs pertaining to Docktown Marina on Redwood Creek in Redwood City. The other ten have also been granted review and been deferred pending resolution of this lead case. The others are (all "*v. Super. Ct. (Redwood City)*): *Behrend* S253757; *Chambers* S253762/255764; *Diaz* S253769; *Fleming* S253766/S255781; *Groce* S253767; *Madden* S253771; *Peschcke-Koedt* S253770; *Reid* S253774; *Humphries* S253778; *Slanker* S253781 (*Chambers & Fleming* re-filed yesterday after new Order entered below (second S # the re-filing Supreme Court Case #, not yet fully resolved).

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I. PROCEDURAL BACKGROUND

Real Party in Interest Redwood City ("**Real Party**") filed a "Return to Order to Show Cause; Answer; and Memorandum of Points and Authorities" ("**Return**") in Response to this Supreme Court's Grant of Petitioner Edward Stancil's ("**Stancil**" and "**Petitioner**") Petition for Review ("**Petition**"). This is Petitioner's Reply ("**Reply**").

Stancil's Petition sought review before this Court, as the last stop in a line of statutory Writ Petitions taken from denial of Stancil's Motion to Quash ("**MTQ**") in the Unlawful Detainer Action 18UDL00903 (Oct. 2018, San Mateo Co. Super. Ct., Law & Motion Dept., the Hon. Susan E. Greenberg, presiding).

Stancil, as noted in n.1, is one of 11 residents of Docktown Marina ("**Docktown**") on Redwood Creek in Redwood City, CA, that have a number of actions pending, under both taxpayer representative status (CCP §526a), as well as a collective writ and compensatory action under the Cal. Relocation Assistance Act, or Law ("CRAL", Gov. Code §7260 *et seq.*). This Court deferred briefing and action on the other 10 Petitions, on a grant and hold basis, pending resolution of this lead case. *See* n.1.

All eleven (11) UD Defendants brought the same MTQ in the Law & Motion Dept. in San Mateo County Superior Court, over a 2-month period in the Fall of 2018, all on the same basis, to wit:

> **that each Complaint, *on its face, revealed a fatal defect* that is *not* an element of a UD cause of action.**

This *facial, fatal defect* was the complete failure to have complied with statutory, heightened venue-pleading requirements applicable in UD, and which failure results in *dismissal without prejudice*, of the UD Complaint. CCP §§396a, 392(b).

Instead of focusing on the heightened (and statutory, mandatory) UD venue-pleading requirements, Real Party rather tries to take control of Petitioner's Petition, and insists that "jurisdiction" is at issue in the MTQ and Writ Petitions. RPI Return, at 13-14, n.5 and *passim* (including RJN).

Real Party contends "jurisdiction" was raised, and is at issue in the Writ Petitions, and asserts this jurisdictional capacity as the basis on review, noting in the cited note 5 that the heightened-venue pleading requirements raise a "procedural" issue. *Id.* (ignoring that all UD is statutory, and that procedure is therefore substance in any event).

Moreover, nothing could be farther from the truth.

First, Petitioner files, together with this Reply, an Application for Order / Motion - to Strike Real Party's Motion for Judicial Notice ("**RJN**"), as irrelevant, distracting, and inapposite. The City Charter and Writ Reply brief filed in a different Action, which Real Party proposes as relevant for judicial notice are not relevant on at all, much less on MTQ, and should be stricken.

Second, Petitioner has raised, by Writ Petitions to the Appellate Division, to the 1DCA and to this Supreme Court, *solely* the heightened venue requirements as the facial, fatal defect supporting MTQ and ensuing dismissal of the UD Complaint(s).

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II. SPECIFICATION OF ISSUE

This Supreme Court granted Stancil's Petition, requesting "specification of issue" briefing, as commonly called. Although Stancil raised two other issues of importance and first impression regarding: (1) the UD venue-pleading statutes (first impression) and (2) statutory Writs in general (prior legislative balancing of harms; importance and split of authority), this Court specified the issue for briefing on which it granted review as:

> "***Whether a motion to quash service of summons is the proper remedy to test whether a complaint states a cause of action for unlawful detainer***."

Discussion of *Greener* to frame the issue:

First, Petitioner would like to note that procedure is not a remedy. In *Greener v. Workers Comp. Appeals Bd.* (1993) 6 Cal.4th 1028, 1036 & n.5, the court used the word "procedure".

Specifically, the *Greener* court (Baxter, J. writing) held that, in general, a challenge to *subject* matter jurisdiction is not intended to be made by "special appearance by a motion to quash service of summons", stating at p. 1036:

> "The only situation in which a motion to quash service of summons has been approved as ***a procedure*** by which to challenge the sufficiency of [a] complaint is in unlawful detainer, where a demurrer is unavailable."

(emphasis added, citing *Delta Imports*, *supra* (secondary reports cite omitted)).

Accordingly, the *Greener* Court called MTQ **a** *procedure*, not a *remedy*, and used the singular article "*a*", not the exclusive article "*the*", which singular article otherwise might imply that only *one* procedure (or remedy, as it may be called), is available.

Moreover, *Greener* did not use the words "***test whether a complaint states a cause of action***", as Real Party urges, but rather "challenge the sufficiency of the complaint in unlawful detainer." These distinctions make a difference, and matter.

In *Greener*, the Court properly noted that challenges to *subject matter jurisdiction* are "properly brought by demurrer", "motion to strike", "motion for judgment on the pleadings", "motion for summary judgment", or by "answer". *Id.* But this is still not the same thing as determining whether a UD complaint is legally sufficient to support a 5-day Summons.

And the *Greener* Court noted (quite literally, in footnote 5, *id.* at 1036):

> We do not intend, by noting this decision, to express approval of the conclusion that *an exception* should be recognized in unlawful detainer actions. That question is not presented here.

(emphasis added).

Petitioner desires to clarify in this Reply (Sec. V., Argument, *infra*), and divert from the voluminous and circular wrangling of both *Borsuk* and Real Party's Return, the very simple concept, that:

> It is not an "*exception*" to the "general rule" of "subject matter jurisdiction" for a Superior Court to quash service of, and the 5-day Summons itself, if the Complaint reveals a facial, fatal defect that does not support bringing the UD Defendant into the "personal jurisdiction" of the Superior Court; meaning the ***5-day Summons is as invalid as the Complaint is invalid.***

This nuance is lost in the rigid thinking of procedure that is otherwise well-settled for general civil cases that do not sound in the summary procedure of unlawful detainer.[2]

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[2] It should be noted that, even though CCP Sec. 1161 generally sets forth the "elements of the cause of action", in the view of *Borsuk* and perhaps even *Delta*, Sec. 1166 also has specific

Indeed, unlawful detainer is "solely" a creature of statute, and no other cause, claim, nor "remedy" may be combined with a cause of action for UD. Saliently, CCP Sec. 1167 is the Summons provision for UD. It is not in the general Summons sections of the CCP, but in the unlawful detainer Code sections.

Specifically, CCP Sec. 1167 says "except", in the following "form" section:

> The summons shall be in the ***form*** specified in Section 410.20, ***except that*** when the defendant is served, the defendant's response shall be filed within five days. ... In all other respects the summons shall be *issued and served* and *returned* in the same manner as a summons in a civil action.

Nothing about the preceding indicates the impact of a fatally flawed complaint, especially one in which the defect is either jurisdictional, substantive and/ot procedural, and "not" an "element of the cause of action." Petitioner does not particularly believe that it matters whether the fatal flaw, and defect, is an element of the cause of action or not, but in our case(s), it is simply a very specific, mandatory and statutory heightened-pleading burden. As argued below, there is no "de minimus" or "substantial compliance" doctrine in UD, it is exacting "because" it is a creature of statute. *See WDT-Winchester v. Nilsson* (1994) 27 Cal.App.4th 516, 520, 27 (citing authority and stating burden is on UD plaintiff to strictly comply with UD statutory scheme, holding so even in a commercial context; here in a public agency taxpayer tenancy, the policy is even more compelling); s*ee also Baugh v. Consum. Assocs., Ltd.* (1996) 241 Cal.App.2d 672, 674-75.

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pleading requirements pertaining to these same elements that are set forth as specific, "procedural" pleading requirements. Thus, an error or defect could be "both" an "element of the cause of action", as well as a blended substantive-procedural statutory facial error at the same time. Our heightened venue pleading requirement falls into the latter category of fatal, facial defect that is both substantive and procedural, but not an "element of the UD cause of action".

Moreover, UD is singular, and no collateral claim(s), procedure(s), action(s) nor remedy(ies) are available to complicate it, *except by consolidation* with another action that also goes to the right of possession, in which event it is actually abuse of discretion "not" to stay or consolidate the UD, whether prior-filed, or filed "after" the UD was commenced. *See, e.g., Martin-Bragg v. Moore* (2013) 219 Cal.App.4th 367, 391 (abuse of discretion for court to insist on summary proceeding when complex issues going to the right of possession were at issue in a related pending proceeding); *Wilson v. Gentile* (1992) 8 Cal.App.4th 759 (unlawful detainer consolidated with specific performance action) (both *Martin-Bragg* and *Wilson* even involved consolidating UDs with actions *later-filed* by UD defendants); *see also Asuncion v. Super. Ct. (W.C. Fin'l, Inc.)* (1980) 108 Cal.App.3rd 141, 146-47 (later-filed fraud suit by UD defendant trumped summary nature of earlier-filed UD; appeals court required them to be consolidated).

Ironically, these "stay or consolidate" cases are cited in the Admin Writ Reply that Petitioner Moves to Strike as improper and irrelevant in Real Party's RJN Motion. *See* RJN, Ex. B-Reply, at 5-6 & n.3. Although Petitioner contends the Reply is irrelevant, the cases cited in it are not, and are independently cited here to emphasize that the "singular" nature of UD supports exceptions where logical bases exist. The same is true of other concepts, including the relation and conflation of sufficient pleading with personal jurisdiction, all as more fully briefed herein.

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III. SECTION II OF "CITY'S RETURN BY ANSWER" SHOULD BE STRICKEN; ANSWER IS TO A *PETITION FOR REVIEW*, NOT IN BRIEFING SET AFTER REVIEW HAS BEEN GRANTED

An Answer to a Petition for Review is optional, and may be filed--and if filed must be filed and served–only within twenty (20) days of the filing of the Petition. Cal. Rules of Court ("**CRC**"), Rule 8.500(a)(2); (e)(4). This Answer timeframe is in the same jurisdictional Rule that applies to Petitioners seeking Review. In other words, the Court may not extend time for Petitioner to file a late Petition for Review, and a Petitioner may only be "relieve[d] from a failure to file a timely petition for review if the time for the court to order review on its own motion has not expired." *Id.*, (e)(3). It does not even appear that the same relief applies to Answer (because it is (e)(3) and applies solely to Petitions and (e)(4) applies to Answers without any such concomitant relief. In any event, Petitioner has seen no request nor order, and believes the "Answer" portion of the Return, Sec. II is improper, unfounded, not excused (no "relief"), and should be stricken in full, with argument and authority therein.

IV. INTRODUCTION TO ARGUMENT

This "Introduction to Argument" Section IV., in this Reply is included to respond to some claims in Real Party's "Introduction" Section I., in its Return, which points are salient for focus, prior to commencing Petitioner's Argument in Section V., *infra*.

Much irrelevant content is also present in Real Party's Section III., "Statement of Facts and Procedural History", in its Return, but that Section is too voluminous to break down and tackle with any focus. Much of it is simply irrelevant to a MTQ, and to this line of statutory Writ Petitions that has culminated in this Petition for Review.

The following were all claimed in Real Party's Introduction (Return, at 8 *et seq.*) (*claims* in *italics*, **response** in **bold underline**):

Claim: Delta "relied on inapplicable case law". **False**. *Delta* relied on the fundamentals of *personal* jurisdiction, it did not confuse personal with subject matter jurisdiction; it rather quite properly analyzed the summary nature of a 5-day Summons, aligned to the summary nature of a UD Action. If there is no UD Action, the 5-day Summons is improper. *See supra,* and *infra* Sec. V., Argument of this Reply.

Claim: Delta set forth "now-discredited analysis". **False**. This is circular, as was the *Borsuk* court's reasoning. It is not discredited by another division of the same District. Nor is it discredited when the reasons it cites are incorrect, as enumerated in the Petition.

Claim: [Stancil moved and Delta is based] on the ground that the plaintiff failed to plead an essential element of the cause of action. **False**. The facial, fatal defect can be a substantive-procedural aspect of UD required by the Code without being an "element of the UD cause of action." *See infra* Sec. V., Argument of this Reply.

Claim: At bottom, motions to quash properly challenge exercise of the court's personal jurisdiction over the defendant, not whether the complaint sufficiently pleads all the elements of a cause of action. **Mixed**.

Delta properly recognized this; it expressly states at 146 Cal.App.3d, at 1036, that:

> "A motion to quash service is the proper method for determining whether the court has acquired personal jurisdiction over the defendant through service of the five-day unlawful detainer summons."

(citing *Castle Park No. 5 v. Katherine* (1979) 91 Cal.App.3d Supp. 6, 8 & n.1).

Indeed, in the unique case of Unlawful Detainer, in which a shortened-time Summons applies, these two aspects are related, if not conflated.

Claim: *"Here, Stancil moved to quash in reliance on* Delta." **True**.

Claim: *"Stancil argued that service of the City's summons and complaint for unlawful detainer should be quashed* ***because the City did not state a cause of action.***" **False**. We argued there was a "facial, fatal defect" that is not an element of a UD cause of action, and the UD Complaint(s) were fatal and must be dismissed per CCP §§396a(a) and 392(b).

Claim: Real Party also contends that *it* argued in Opposition on MTQ in the Superior Court that:

> *"the defense he [Stancil] advanced, even if correct, did not provide a basis for him to continue to possess the property."*

False. There ARE no "defenses" yet. Petitioner has not Answered, nor interposed any Affirmative Defenses. A UD Defendant bringing a MTQ does not "defend" – he or she asserts that the Superior Court has failed to obtain "personal jurisdiction" over him or her using a 5-day Summons, because there is a facial, fatal defect. There is not yet any consideration of defenses at the MTQ stage. Real Party well knows this.

Claim: Real Party then (as it often does) called Petitioner's Writ Petitions below *"meritless"* and *"improper,"* and called all of the 1DCA's summary denials "decisions".

False. The 1DCA did not call the Petition either "improper" nor "meritless", and it is neither. Real Party asserts the Petition was "improper" based on rules of court and statutes that apply to ***appeals***, not statutory ***Writ Petitions*** pursuant to CCP §418.10.[3]

Moreover, although the Appellate Division did include *some* discussion in its summary Orders, the 1DCA denials were entirely summary, and not "decisions" at all[4].

V. ARGUMENT

Petitioner will not simply repeat the same authority and arguments set forth in the Petition; therein we highlighted that *Delta Imports* is brief yet fresh; it is straightforward in its logical analysis and although it is "deceptively simple" as pointed out in the Petition, it is easy to get lost in off-point, circular analysis, which *Borsuk* did, and which Real Party's Return also does. See *Borsuk v. App. Div. Super. Ct. (LA Hillcreste Apts., LLC)* (2015) 242 Cal.App.4th 607. As noted in the Petition, *Borsuk* is a poor adversary for *Delta*.

Real Party phrased the holding of *Delta Imports* as:

> "***That an unlawful detainer defendant may challenge by motion to quash whether the complaint states facts sufficient to constitute a cause of action***".

But this is not quite right.

Delta was brief, but its first sentence cast its holding by the question asked:

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[3] Real Party has provided no authority that a Writ Petition taken pursuant to an express statute (CCP Sec. 418.10) providing for such statutory writ, from a Law & Motion decision, is to be treated as if it were ***an appeal of a final judgment*** in a limited civil case, pursuant to the Rules of Court Real Party cites. *See* RPI's n.2 at p. 9. All the Rules of Court and CCP Sections Real Party cites pertain to transfer and certification of "***appeals***", not to statutory Writ Petitions. Using Real Party's own vocabulary, its reliance on this point is both improper and meritless.

[4] Although the 1DCA clearly could have denied Petitioner's CCP §418.10 ***statutory Writ Petition*** via a decision, with a statement of reasons, it did not do so. It could have simply stated that it agreed with Real Party that the "***Writ Petitions***" were "improper" due to a failure to have sought transfer under the California Rules of Court that pertain to ***appeals***.

> "This appeal raises the issue of whether *a tenant in an unlawful detainer action is entitled to quash service of summons* where *the underlying complaint fails to state a cause of action for unlawful detainer*."

146 Cal.App.3d at 1034-35 (first sentence of the opinion, italics emphasis added).

Although this is a high-level statement of the Issue Presented, it is not the same thing as saying that the MTQ takes the place of a Demurrer, as it is often cast. Quite simply, if the complaint shows on its face that it is not a well-pleaded UD Complaint, then the 5-day Summons used to shorten time to hail a defendant into court, and respond within 5 days, is ineffective, and no personal jurisdiction attaches.

This is cemented by the court's holding:

> "If the underlying complaint fails to state a cause of action for unlawful detainer, then use of the five-day summons is improper and the defendant is entitled to an order quashing service as a matter of law."

Id. at 1035 (citing *Greene v. Muni. Ct.* (1975) 51 Cal.App.3d 446, 451-52). Already, as cited above, it had already recognized, in the lead-in to this holding that:

> "A motion to quash service is the proper method for determining whether the court has acquired personal jurisdiction over the defendant through service of the five-day unlawful detainer summons."

(citing *Castle Park, supra).*

The court literally held an "if/then" rule applies -- the Summons itself is defective and *in*effective, if the Complaint is fatally flawed. In *Delta*, it is often said that the UD defendant attempted to make "service" of the 3-day notice "jurisdictional", but this is not the case – in *Delta*, the UD plaintiff simply failed to plead at all, with specificity or otherwise, that either a 3-day "or" 30-day notice *had been served*, "that the notice was in writing, that it specified the alleged breaches of the lease, or [even] that it unequivocally

demanded possession"! Id. at 1036 (exclamation mine). This is germane because the 3-day notice must allow "cure or quit", and as the *Delta* court noted, how could a tenant be expected to do anything without having received such a notice?

This is likely the basis for *Delta's* caveat that, "under the circumstances of this case", *id.* at 1035,[5] it held as it did. But nonetheless it crafted a logical rule to apply in other worthy situations, namely where the UD Complaint reveals on its fact a fatal, defective flaw. In our case, that flaw is so germane that it leads to dismissal of the Complaint under the Code sections. It may be the only pleading requirement that does, but UD Plaintiff did not allege any facts showing where it filed the Complaint, that it was filed in the location and branch of the proper county or otherwise. Like the flaw in Delta, it simply contained "no" allegations sufficient to satisfy the exacting statutory mandate.

Finally, two things need to be mentioned. The first is the "amendment" to the Code that ostensibly removes all risk of "special" vs. "general" appearance. This is a red herring. If pleaded together and the court denies a MTQ, automatically a general appearance has been made. This is one reason why Petitioner(s) here brought a MTQ alone. First, the Superior Court Law & Motion Dept. and Appellate Division both purported to demand a demurrer be filed (rather than a Motion to Strike), and the Appellate Division purported to remove MTS from the plan of attack without it having

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[5]The court ruled, "At a minimum ..... requires allegations that the defendant was served with a written notice, specifying the alleged breach, and unequivocally demanding possession within three days of service of the notice. .... In any case, the notice must advise the tenant of the alleged breach. If it does not do so, the tenant cannot know whether to comply with the notice to quit or remain in possession and contest the landlord's allegations." Id. at 1036 (citing *Feder v. Wreden Pack. Prov. Co., Inc.* (1928) 89 Cal.App. 665, 671).

been raised or briefed. It is still dicey for a UD defendant to plead MTQ and demurrer or MTS all at the same time, and a court cannot so require.

Second, "whether a demurrer is available" is also a red herring. *Delta* likely meant that demurrer is, for all practical intents and purposes, unavailable because it *constitutes* the general appearance, not that it would not later, or also, have been available to challenge the complaint for failure to have pleaded the 3-day notice. Although Delta did gloss over the "any" cause of action vs. a UD cause of action, it simply never needed to get that far, because MTQ is and should be "a" method or process or procedure (or remedy, if so desired) for challenging "personal jurisdiction" on a 5-day Summons when the complaint is fatally and facially deficient.

Finally, the concern of "mini trials" is inapposite, and another red herring. There is no statistical, nor quantitative reference in any brief or decision that supports there is an avalanche of "mini trials" overwhelming the Superior Court Law & Motion Depts. First, UD is a departure from normal service and jurisdictional rules, and since it is summary in nature, it must be scrupulously guarded. California is in a housing crisis of first impression in its severity, and UD defendants are entitled to proper service and process.

MTQ is a "speaking motion", but does not support "mini trials", simply the kind of declarations that disclose whether an element of a cause or action, or a procedural or substantive requirement, was indeed honored. But in any case, it is inapposite again, when the Complaint shows *on its face*, a fatal defective flaw.

///

VI. CONCLUSION

Petitioner respectfully submits this Reply brief, and asks the Court to rule in its favor, *answering the question in the affirmative* that ***yes***, (flashback to *Greener*):

> a motion to quash service of summons [is] approved as ***a procedure*** by which to challenge the sufficiency of [a] complaint [in] unlawful detainer ....
>
> And blended with *Delta* such that:
>
> [i]f the underlying complaint fails to state a cause of action for unlawful detainer, then use of the five-day summons is improper and the defendant is *entitled* to an order quashing service as a matter of law."

Petitioner also respectfully requests that the court deny fees or costs to City, as City has behaved in such a manner as to engage 4 (four) outside counsel (3 partners and an associate, in addition to multiple support staff vs. one lawyer for UD Defendants (Madden, by association to and with TBM, but handling all aspects); moreover, City repeatedly failed and refused to stipulation to consolidation, and even withdrew an agreed Stipulation to Consolidate pending signature on the day this Court granted review. Given the issues raised ultimately by Affirmative Defense (lack of right to possession in Council), and the pending CRAL and due process writ actions, as well as a taxpayer 526a Action alleging complete lack of capacity, attorneys fees and costs are not warranted; moreover, this Petition is in the public interest and settles an important question of law in favor of UD tenants statewide in a housing crisis of first-impression proportions.

Dated: May 14, 2019

By: //AM//
Alison M. Madden SBN 172846

VII. **CERTIFICATE OF WORD COUNT** – Madden certifies that the Word Count of this Reply is 4580 words, including all tables, sheets and other content.

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FOR COURT USE ONLY

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BRANCH NAME: Southern Branch: Hall of Justice and Records

PLAINTIFF/PETITIONER: Redwood City

DEFENDANT/RESPONDENT: Edward Stancil

CASE NUMBER: S253783

JUDICIAL OFFICER: Supreme Court

DEPARTMENT: Petition for Review

PROOF OF ELECTRONIC SERVICE

1. I am at least 18 years old.
   a. My residence or business address is *(specify)*:
   PO Box 620650, Woodside, CA 94062

   b. My electronic service address is *(specify)*:
   maddenlaw94062@gmail.com

2. I electronically served the following documents *(exact titles)*:
   Petitioner's Reply Brief; this PoS

   ☐ The documents served are listed in an attachment. *(Form POS-050(D)/EFS-050(D) may be used for this purpose.)*

3. I electronically served the documents listed in 2 as follows:
   a. Name of person served: Randall Block et al. (physical hard copy 5/15/19 personal svc by AM)
   On behalf of *(name or names of parties represented, if person served is an attorney)*:
   City of Redwood City
   b. Electronic service address of person served :
   rblock@bwslaw.com and by Truefiling e-file to Kevin Siegel, others by courtesy e-mail reply
   c. On *(date)*: May 14, 2019

   ☐ The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. *(Form POS-050(P)/EFS-050(P) may be used for this purpose.)*

Date: 05/14/2019 (hard copy) + 5/15/19

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Alison Madden
(TYPE OR PRINT NAME OF DECLARANT)

Alison Madden
(SIGNATURE OF DECLARANT)

Form Approved for Optional Use
Judicial Council of California
POS-050/EFS-050 [Rev. February 1, 2017]

PROOF OF ELECTRONIC SERVICE
(Proof of Service/Electronic Filing and Service)

Cal. Rules of Court, rule 2.251
www.courts.ca.gov