

**B339009**

**IN THE COURT OF APPEAL  
OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT, DIVISION FIVE**

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**CHRISSIE CARNELL BIXLER et al.,**  
*Plaintiffs and Respondents,*

*v.*

**CHURCH OF SCIENTOLOGY INTERNATIONAL et al.,**  
*Defendants and Appellants.*

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APPEAL FROM LOS ANGELES COUNTY SUPERIOR COURT  
UPINDER S. KALRA, JUDGE • CASE NO. 19STCV29458

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**PETITION FOR REHEARING**

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## PETITION FOR REHEARING

This rehearing petition presents an issue of critical importance to the legal profession: the abuse of artificial intelligence. Plaintiffs' counsel has admitted using artificial intelligence tools to prepare the respondents' brief. He has admitted filing that brief without verifying the citations. And it is undisputed that the brief contained significant and material citation errors.

Yet this court has not imposed sanctions. Although the court issued an order to show cause identifying the basis for sanctions and signaling that the issue would be argued alongside the merits, the court addressed sanctions neither at oral argument nor in its opinion. If the court still intends to resolve the sanctions issue, it can simply deny this petition as moot.

But if the opinion represents the court's final word on sanctions, then the court should grant this petition and impose them. The legal profession is witnessing a rapid rise in artificial intelligence abuse. Courts must provide guidance on how lawyers should navigate this new territory—and on the consequences when a lawyer wields artificial intelligence in a manner that violates ethical duties. (See *Sheerer v. Panas* (2026) 119 Cal.App.5th 367, 371 [explaining that the rule of law is “threatened when litigants falsify the truth, especially when done by using technological innovations that can spin persuasive webs of untruths and invent legal principles or authorities”].)

The Church is unaware of a single court that has declined to impose sanctions when confronted with clear evidence of

artificial intelligence abuse. This court should not be the first. Declining to do so suggests that an attorney can escape accountability for improperly using artificial intelligence tools simply by admitting he did so.

Declining to impose sanctions also prejudices the Church. As explained, the Church incurred substantial fees identifying the materially erroneous citations and arguments, bringing them to this court's attention, and litigating plaintiffs' motion to file a replacement brief—which this court denied. (See ARB 8–9, 25–27, 30–33, 41–48 [ARB Attachment A]; see generally Opp. to Mot. for Leave to File Replacement Brief.) That work was necessary *only* because plaintiffs' counsel violated his ethical duties. A decision not to impose sanctions to make the Church whole disregards the significant harm those violations caused.

This issue was extensively briefed. Plaintiffs did not object to the court's order to show cause. If the court does not intend to issue a separate order, it should grant this petition, address sanctions, and award the Church the fees incurred as a direct result of plaintiffs' counsel's ethical violations.

June 3, 2026

**HORVITZ & LEVY LLP**

JASJAAP S. SIDHU

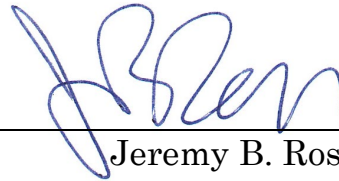
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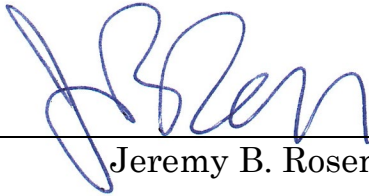
**SCIENTOLOGY CELEBRITY**

**CENTRE INTERNATIONAL**

**CERTIFICATE OF WORD COUNT  
(Cal. Rules of Court, rule 8.204(c).)**

The text of this brief consists of 417 words as counted by the program used to generate the brief.

Dated: June 3, 2026



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Jeremy B. Rosen

**PROOF OF SERVICE**  
***Bixler et al. v. Church of Scientology International et al.***  
**Case No. B339009**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 3601 West Olive Avenue, 8th Floor, Burbank, CA 91505-4681.

On June 3, 2026, I served true copies of the following document(s) described as **PETITION FOR REHEARING** on the interested parties in this action as follows:


**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Horvitz & Levy LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:**  
Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission via Court's Electronic Filing System (EFS) operated by ImageSoft TrueFiling (TrueFiling) as indicated on the attached service list:

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

Executed on June 3, 2026, at Burbank, California.

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Cassandra A. Johnson

**SERVICE LIST**  
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**Case No. B339009**

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<p>Clerk of the Court  Hon. Upinder S. Kalra, Dept. 51  Los Angeles Superior Court  Stanley Mosk Courthouse  111 North Hill Street  Los Angeles, CA 90012  (213) 633-0351</p>	<p>Trial Court Judge</p> <p>Case No. 19STCV29458</p> <p><i>[Via U.S. Mail]</i></p>