
In the
Court of Appeal
of the
State of California
SECOND APPELLATE DISTRICT
DIVISION FIVE

B339009

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

v.

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

APPEAL FROM THE SUPERIOR COURT OF LOS ANGELES COUNTY
HONORABLE UPINDER KALRA · NO. 19STCV29458

**RESPONDENTS' RESPONSE TO NOTICE
OF IMPOSITION OF SANCTIONS**

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OF IMPOSITION OF SANCTIONS**

To the Honorable Brian M. Hoffstadt, PRESIDING JUSTICE, COURT OF APPEAL, Second Appellate District, Division Five:

Respondents Chrissie Carnell Bixler, Cedric Bixler-Zavala, Jane Doe #1, Jane Doe #2, and Maria Bobette Riales (collectively, "Respondents"), and their counsel of record, John J. Kucera of Boies Schiller Flexner LLP ("BSF" or the "Firm"), respectfully submit this Response to the Court's Notice of Imposition of Sanctions dated February 19, 2026. Our position remains consistent with our prior filings, that the errors should not have occurred, any sanctions should be directed toward counsel and not Respondents, and BSF is fully committed to the responsible use of artificial intelligence ("AI").

BSF is committed to the responsible use of artificial intelligence and has adopted policies and implemented trainings intended to protect against its improper use. Such policies were adopted, and these trainings occurred, both before and after the errors that occurred in this matter. After the errors that occurred in this matter, the Firm redoubled its efforts to ensure Firm

lawyers use AI in a responsible manner. As just one example, BSF recently mandated a Firm-wide training for all lawyers, paralegals, and other employees involved in court filings or client work product concerning the state of the law on errors in legal submissions related to the use of generative AI, and best practices for cite checking in light of risks introduced by AI tools.

The errors in Respondents' appeal brief are obviously inconsistent with Firm standards as well as the personal standards of counsel of record. From the time these errors came to light, counsel of record has endeavored to take complete responsibility and transparently correct the record, while ensuring that Respondents themselves suffer no prejudice.

Consistent with prior filings, counsel of record is prepared to accept whatever consequences the Court deems appropriate in the circumstances, and—although co-counsel will be handling the primary merits argument on appeal—will be personally present at oral argument to address any questions that the panel may have about the errors in Respondents' brief, or about what actions the Court may take in response.

Respondents and Counsel acknowledge the Court's authority under California Rules of Court, rule 8.276, and express

respect for the Court's determination in this matter. No further argument or opposition is presented.

Respondents and Counsel thank the Court for its consideration.

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

/s/ John J. Kucera

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Chrissie Carnell Bixler, et al.

State of California)
County of Los Angeles)
)

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I, Kirstin Largent, declare that I am not a party to the action, am over 18 years of age and my business address is: 626 Wilshire Blvd., Suite 410, Los Angeles, California 90017.

On 3/2/2026 declarant served the within: **RESPONDENTS' RESPONSE TO NOTICE OF IMPOSITION OF SANCTIONS**
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Second Appellate District, Division Five
Ronald Reagan State Building
300 South Spring Street, Second Floor
Los Angeles, California 90013

I declare under penalty of perjury that the foregoing is true and correct:

Signature: /s/ Kirstin Largent, Senior Appellate Paralegal, Counsel Press Inc.; klargent@counselpress.com

Document received by the CA 2nd District Court of Appeal.

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