

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

DIVISION FIVE

COURT OF APPEAL – SECOND DIST.

FILED

Feb 19, 2026

EVA McCLINTOCK, Clerk

kdominguez Deputy Clerk

CHRISSIE CARNELL BIXLER et al.,

Plaintiffs and Respondents,

v.

CHURCH OF SCIENTOLOGY  
INTERNATIONAL et al.,

Defendants and Appellants.

B339009

(Los Angeles County  
Super. Ct. No.  
19STCV29458)

**NOTICE OF  
POTENTIAL  
SANCTIONS**

Respondents' counsel, Boies Schiller Flexner, LLP and John Kucera, Esq., have conceded as follows: counsel prepared the Brief of Respondents, filed on July 30, 2025, with the aid of artificial intelligence tools; controls and policies to protect against the risk of improper use of those tools failed; and the filed brief included material citation errors that were correctly identified by appellants in their reply brief. Appellants' Reply Brief, filed on September 8, 2025, specifically identifies (in Attachment A at pages 41-48) at least ten purported case authorities that have been miscited or mischaracterized in more than fifteen places in respondents' brief.

Accordingly, counsel for respondents is hereby given notice pursuant to California Rules of Court, rule 8.276, subd. (c), that the court is considering the imposition of monetary sanctions on respondents' counsel for the foregoing conduct. (See *Noland v. Land of the Free, L.P.* (2025) 114 Cal.App.5th 426, 441–448; *Schlichter v. Kennedy* (2025) 116 Cal.App.5th 24; *Shayan v. Shakib* (2025) 116 Cal.App.5th 619; and Cal. Rules of Court, rules 8.276(a)(4) [sanctions for unreasonable violations of rules of court], 8.204(a)(1)(B) [failure to support contentions with citations to legal authority], and 8.1115(a) [prohibition on citing unpublished authority].)

Respondents and their counsel may file an opposition to the imposition of sanctions within 10 days from the date of this notice. (Cal. Rules of Court, rule 8.276(c)-(d).) The issue of sanctions and their amount will be argued at the time of oral argument on the merits of the appeal. (Cal. Rules of Court, rule 8.276(e).)



---

Carl H. Moor  
Acting Presiding Justice