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8 *Attorneys for Defendants*
John Reynolds, Darcie L. Houck, Karen
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10 *and Rob Bonta, in their official capacities*

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
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15 **PACIFIC BELL TELEPHONE**
16 **COMPANY d/b/a AT&T**
17 **CALIFORNIA,**

18 **Plaintiff,**

19 **v.**

20 **JOHN REYNOLDS, in his official**
21 **capacity as President of the**
22 **California Public Utilities**
23 **Commission; DARCIE L. HOUCK,**
24 **KAREN DOUGLAS, MATTHEW**
25 **BAKER, and CHRISTINE**
26 **HARADA, in their official capacities**
27 **as Commissioners of the California**
28 **Public Utilities Commission; ROB**
BONTA, in his official capacity as
Attorney General of the State of
California,

Defendants.

3:26-cv-03148-LL-JAC

**NOTICE OF MOTION AND
MOTION TO DISMISS**

Hearing Date: September 3, 2026
Dept: Courtroom 14B
Judge: Hon. Linda Lopez
Trial Date: Not Set
Action Filed: May 20, 2026

**PER CHAMBERS RULES, NO
ORAL ARGUMENT UNLESS
SEPARATELY ORDERED BY
THE COURT**

1 TO THE COURT AND PLAINTIFF:

2 PLEASE TAKE NOTICE that on Tuesday, September 3, 2026, Defendants
3 John Reynolds, in his official capacity as President of the California Public Utilities
4 Commission (“CPUC”); Darcie L. Houck, Karen Douglas, Matthew Baker, and
5 Christine Harada, in their official capacities as Commissioners of CPUC; and Rob
6 Bonta, in his official capacity as Attorney General of the State of California, will
7 and hereby do move to dismiss this action under Federal Rules of Civil Procedure
8 12(b)(1) and (b)(6) for want of jurisdiction and for failure to state a claim. This
9 motion is made following a meet-and-confer with Plaintiff’s counsel that took place
10 on July 10, 2026. This motion is timely filed consistent with this Court’s order
11 (ECF No. 41) extending Defendants’ deadline to respond to the complaint to 14
12 days following the Court’s order on Plaintiff’s motion for preliminary injunction.
13 That order was issued on July 16, 2026 (ECF No. 46).

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1 This Motion is based on this Notice of Motion and Motion to Dismiss; the
2 accompanying Memorandum of Points and Authorities; the accompanying Request
3 for Judicial Notice; all pleadings and papers on file in this action; and such other
4 matters as the Court may deem appropriate.

5 Dated: July 30, 2026

Respectfully submitted,

6 ROB BONTA
7 Attorney General of California
8 TODD GRABARSKY
9 Supervising Deputy Attorney General
10 SABRINA T. MCGRAW
11 VIVIANA M. HANLEY
12 Deputy Attorneys General

13 /s/ Camille Framroze
14 CAMILLE FRAMROZE
15 Deputy Attorney General
16 *Attorneys for Defendants*
17 *John Reynolds, Darcie L. Houck,*
18 *Karen Douglas, Matthew Baker,*
19 *Christine Harada, and Rob Bonta, in*
20 *their official capacities*
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CERTIFICATE OF SERVICE

Case Name: ***Pacific Bell Telephone Company dba AT&T California v. John Reynolds, et al.***
Case No. **3:26-cv-03148**

I hereby certify that on July 30, 2026, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- 1. NOTICE OF MOTION AND MOTION TO DISMISS**
- 2. MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**
- 3. REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on July 30, 2026, at Los Angeles, California.

J. Sissov
Declarant

/s/ J. Sissov
Signature

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