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San Luis Obispo Superior Court
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN LUIS OBISPO

DENISE SMART; STAN SMART; MATTHEW SMART; AND LINDSEY STEWART, INDIVIDUALS, Plaintiffs, **v.** **CALIFORNIA POLYTECHNIC STATE UNIVERSITY, SAN LUIS OBISPO, A CALIFORNIA PUBLIC UNIVERSITY; AND DOES 1 THROUGH 10, INCLUSIVE,** Defendants.	Case No. 24CV-0046 **BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY'S NOTICE OF HEARING ON DEMURRER AND DEMURRER TO FIRST, SECOND, AND THIRD CAUSES OF ACTION OF THE COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT; DECLARATION OF ANDREW ADAMS IN SUPPORT THEREOF** **[REQUEST FOR JUDICIAL NOTICE FILED CONCURRENTLY HEREWITH]** Date: 8/15/2024 Time: 9:00 a.m. Dept: 2 Judge: Hon. Craig B. van Rooyen Trial Date: Action Filed: January 18, 2024

TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 15, 2024 or as soon thereafter as the matter may be heard, in Department 43 of the above-entitled Court located at 1050 Monterey Street, San Luis Obispo 93408, Defendant Board of Trustees of the California State University (University) (erroneously sued as California Polytechnic State University, San Luis Obispo, a California

Public University), will and hereby does demur to the Complaint of Plaintiffs Denise Smart, Stan Smart, Matthew Smart and Lindsey Stewart pursuant to Code of Civil Procedure section 430.10, subdivision (e). Pursuant to Code of Civil Procedure 430.41, counsel for the moving parties and for the plaintiff met and conferred by email and via telephone about the issues raised by this demurrer, but were unable to reach an agreement. (Decl. of Andrew Adams, Para. 2.)

The demurrer will be based upon this notice and demurrer, the supporting memorandum of points and authorities, the Complaint, the request for judicial notice filed concurrently herewith, the papers and records on file herein, and on such other and further evidence or argument as may be presented at or before the time of the hearing. Pursuant to Local Rule 7.111, prior to the day of the hearing, any civil department may issue a tentative ruling on any law and motion matter, in the sole discretion of the assigned judge. If a tentative ruling is issued prior to the day of the hearing it will be issued in conformance with the tentative ruling procedures set forth in California Rules of Court, rule 3.1308 (a) (2). The tentative ruling, if any, will be available at the court's website no later than 4:00 p.m. the day prior to the hearing. This rule does not preclude posting a tentative ruling the day of the hearing pursuant to California Rules of Court, rule 3.1308, subdivision (b), nor does it mandate a tentative ruling be issued on all law and motion matters.

Dated: April 2, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
CATHERINE WOODBRIDGE
Supervising Deputy Attorney General

Andrew Adams

ANDREW F. ADAMS
Deputy Attorney General
Attorneys for Defendant Board of Trustees of the California State University

DEMURRER TO COMPLAINT

Defendant Board of Trustees of the California State University State of California (University), hereby generally demurs to the first, second, and third causes of action of the Complaint on the grounds that each cause of action is barred by the statute of limitations (Code of Civ. Proc., §§ 335.1, 342), a failure to comply with the Government Claims Act (Gov. Code, §§ 911.2 *et seq.*), and res judicata.

Defendant University also specially demurrer to each and every cause of action in the complaint as follows:

DEMURRER TO FIRST CAUSE OF ACTION FOR NEGLIGENCE:

1. Defendant University demurs to the first cause of action for negligence on the grounds that the first cause of action fails to identify a statutory basis for liability. (Gov. Code, § 815);

2. Defendant University demurs to the first cause of action for negligence on the grounds that plaintiffs lack standing to sue. (Code Civ. Proc., §377.60; Prob. Code, § 6401);

3. Defendant University demurs to the first cause of action for negligence on the grounds that the cause of action is barred by immunity. (Gov. Code, §§ 820.2, 820.8, 845, 846.)

DEMURRER TO SECOND CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS:

1. Defendant University demurs to the second cause of action for negligent infliction of emotional distress on the on the grounds that the second cause of action fails to identify a statutory basis for liability. (Gov. Code, § 815);

2. Defendant University demurs to the second cause of action for negligent infliction of emotional distress on the grounds that plaintiffs lack standing to sue. (Code Civ. Proc., §377.60; Prob. Code, § 6401);

3. Defendant University demurs to the second cause of action for negligent infliction of emotional distress on the grounds that the cause of action is barred by immunity. (Gov. Code, §§ 820.2, 820.8, 845, 846.)

DEMURRER TO THIRD CAUSE OF ACTION FOR WRONGFUL DEATH:

1. Defendant University demurs to the third cause of action for wrongful death on the grounds that the cause of action fails to identify a statutory basis for liability. (Gov. Code, § 815);

2. Defendant University demurs to the third cause of action for wrongful death on the grounds that plaintiffs lack standing to sue. (Code Civ. Proc., §377.60; Prob. Code, § 6401);

3. Defendant University demurs to the third cause of action for wrongful death on the grounds that the cause of action is barred by immunity. (Gov. Code, §§ 820.2, 820.8, 845, 846.)

Dated: April 2, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
CATHERINE WOODBRIDGE
Supervising Deputy Attorney General

Andrew Adams

ANDREW F. ADAMS
Deputy Attorney General
Attorneys for Defendant Board of Trustees of the California State University

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

This lawsuit arises out of the murder of Kristin Smart in 1996. The Complaint has overlapping but independent flaws that require sustaining the specific and general demurrer without leave to amend. The Court should sustain this demurrer because: (1) the Complaint is barred by the statute of limitations; (2) the Complaint fails to comply with the Government Claims Act; (3) the causes of action are barred by res judicata: (4) the Complaint fails to identify a statutory basis for liability; (5) plaintiffs lack standing; and (6) the University is immune from liability. Because of the nature of these failings act as bars to these causes of action, there is no path for curing the defects. This Court should sustain this demurrer without leave to amend.

II. PROCEDURAL BACKGROUND

Kristin Smart was finishing her freshman year at Cal Poly San Luis Obispo (University) when she was murdered by Paul Flores on May 25, 1996. (Compl. ¶ 1.) In March 2023, Paul Flores was convicted of the murder of Kristin Smart and sentenced to 25 years to life in prison. (Compl. ¶ 1.) Following that conviction, University President Jeffrey Armstrong offered a statement to the Smart Family, in which he notes that "'[W]e recognize that things should have been done differently – and I personally wish that they had.'" (Compl. ¶¶ 2, 22, 84.) This statement by President Armstrong is the lone basis for the new Complaint.

In 1997, Denise and Stan Smart, Kristin's parents (Parent Plaintiffs) filed a claim pursuant to the Government Claims Act and thereafter filed suit alleging a failure to protect Kristin Smart resulting in her murder. (RJN ¶¶ 1, 2.) The lawsuit was based on the claim of premises liability for failure to protect Kristin Smart from her murderer, Paul Flores. (RJN ¶¶ 1, 2.)

The lawsuit was dismissed by Order sustaining demurrer and judgment was entered in favor of University. (RJN ¶ 3.) Parent Plaintiffs appealed, and later dismissed the lawsuit with prejudice while the appeal was pending. (RJN ¶ 4.) Remittitur issued and the dismissal was entered on December 16, 1998. (RJN ¶ 5.) The plaintiffs and University stipulated to dismissal of the appeal in December 1998. (RJN ¶ 5.)

The current Plaintiffs include the Parent Plaintiffs and the siblings, Matthew Smart and Lindsey Stewart (Sibling Plaintiffs). They filed the operative Complaint on January 18, 2024. (Compl. p. 1.) The Complaint contains three causes of action arising out of the murder of Kristin Smart. The first and second causes of action are alleged by all plaintiffs and the third cause of action for wrongful death is brought by the Parent Plaintiffs only. (Compl. p. 1, 12, 14.)

III. ARGUMENT

A. STANDARD ON DEMURRER

A defendant may demur to a complaint if the pleading fails to state facts sufficient to constitute a cause of action, or is uncertain. (Code Civ. Proc., § 420.10, subd. (e)-(f).) A demurrer can be used to challenge defects that appear on the face of the complaint or from matters outside the complaint that are judicially noticeable. (*Donabedian v. Mercury Ins. Co.* (2004) 116 Cal.App.4th 968, 994.) The court properly sustains a general demurrer brought under Code of Civil Procedure section 430.10, subdivision (e) when the pleading fails to allege facts supporting an essential element of a cause of action. (*Rakestraw v. California Physicians' Service* (2000) 81 Cal.App.4th 39, 43.) The demurrer should be sustained without leave to amend based on an expired statute of limitations and failure to comply with the Government Claims Act - both fatal defects. In addition, the Complaint fails to state any statutory basis for any claims which is a bar to the claims, as a matter of law. Finally, lack of standing and statutory immunities bar recovery.

B. ALL CLAIMS ARE BARRED BY STATUTE OF LIMITATIONS

Plaintiffs' Complaint is untimely because it violates the statute of limitations. Negligence and wrongful death causes of action have a two year statute of limitations (Code Civ. Proc., §§ 335.1, 342.) Code of Civil Procedure section 335.1 provides the statute of limitations for injury or death caused by neglect is two years. However, "[a]n action against a public entity upon a cause of action for which a claim is required to be presented in accordance with Chapter 1 (commencing with Section 900) and Chapter 2 (commencing with Section 910) of Part 3 of Division 3.6 of Title 1 of the Government Code, must be commenced within the time provided in Section 945.6 of the Government Code." (Code Civ. Proc., § 342.)

Code of Civil Procedure section 342 is explicit that the claim deadlines set by the Government Code are governing as statute of limitations in their own right. While a plaintiff might have a two year statute of limitations for negligence personal injury claims or wrongful death claims (Code Civ. Proc. § 335.1) against non-government defendants, Section 342 requires compliance with the Government Code, which in turns requires a government claim be filed within six months from the alleged injury producing incident. (Gov. Code, § 945.6, subd. (a)(1).)

The three causes of action in the Complaint all stem from Kristin Smart's murder in 1996. A cause of action begins its accrual when all the elements of the tortious conduct are completed. (*Norgart v. Upjohn Co.* (1999) 21 Cal.4th 383, 397.) The plaintiffs alleged in the 1996 lawsuit that Kristin Smart was already dead. (RJN ¶¶ 1, 2.) They alleged that the University (and other named defendants) had caused her death and the injuries they suffered from her death were already known to them in 1996. (RJN ¶¶ 1, 2.)

While the statement by President Armstrong is mentioned three times in the Complaint (Compl., ¶¶ 2, 22, 84), none of the factual assertions that are the basis for the causes of action are attributed to that statement. Indeed, none of the facts that underlie the causes of action are connected in any way to the statement. The Complaint simply alleges that "[i]t was at this point that the Smart family began to understand Cal Poly's failings;" (Compl. ¶ 23.) However, the alleged failings are not attributed to the 2023 statement. The alleged failings are that the University "breached its duty of care by failing to reasonably investigate and act" on Flores prior to the murder (Compl. ¶ 89); that the University "breached its duty to Plaintiffs by failing to act with reasonable care so as to avoid foreseeable harm to Plaintiffs" (Compl. ¶ 98); and the University "breached its duty by failing to reasonably investigate and act on prior reports of Flores' behavior, which posed a substantial risk of harm to Plaintiffs." (Compl. ¶ 106.)

The Complaint fails to allege that President Armstrong's 2023 statement led to any of the other facts Plaintiffs assert as the basis of their claims. The statement did not cause the alleged failure to investigate or the murder. Rather, the statement expressed understandable regret from the President about the situation in general, and there are no factual assertions to establish liability beyond the President's own personal feelings regarding the tragedy of Kristin Smart's death.

(Compl. ¶¶ 2, 22, 84.) His statement does not renew or restart the relevant statute of limitations or GCA requirements. Instead, Plaintiffs were required to comply with the relevant statute of limitations provided by Code of Civil Procedure section 342. The deadline for doing so was six months after the death of Kristin Smart more than 27 years ago. Because the statute of limitations is an absolute bar to plaintiffs' claims, the Court to sustain the demurrer without leave to amend.

C. FAILURE TO COMPLY WITH GOVERNMENT CLAIMS ACT BARS PLAINTIFFS' CLAIMS

A party suing a state agency or employee must comply with the Government Claims Act (GCA) and must file a government claim within six months of the accident-causing injury. (Gov. Code, § 911.2.) In order to comply with the GCA, plaintiffs had six months (or one year if granted leave to file a late claim pursuant to the specific relief process in Gov. Code §§ 911.4 *et seq.*) to file the claim in order to preserve any right to file suit later.

Filing a claim is the condition precedent, and failure to comply with the GCA is "fatal to the cause of action." (*City of San Jose v. Superior Court* (1974) 12 Cal.3d 447, 454.) The State is immune from tort liability and the GCA was passed "not to expand the rights of plaintiffs in suits against governmental entities, but to confine potential governmental liability to rigidly delineated circumstances: immunity is waived only if the various requirements of the act are satisfied." (*Williams v. Horvath* (1976) 16 Cal.3d 834, 838.) The GCA requirements were not met here and therefore plaintiffs' claims are barred.

Plaintiffs filed their new claim on August 25, 2023. (Compl. ¶ 21; RJN ¶ 6.) In response to their government claim, plaintiffs received a letter notifying them that the claims were not timely. (RJN ¶ 7.) Plaintiffs then applied for leave to file a late claim, which was denied by the University on October 11, 2023. (RJN ¶ 8.) That denial letter properly directed plaintiffs to Government Code sections 945.4 and 946.6, noting that they could "file a petition action with a court seeking an order relieving them from the provisions of California Government Code section 945.4." (RJN ¶ 8.) Plaintiffs did not petition the court for late claim relief. Therefore, plaintiffs had an untimely claim that was never acted upon, and a rejected Application for Leave to Present

a Late Claim for which they did not seek court review. (Compl. ¶ 27.) In this way, they have not complied with the GCA.

D. ALL CLAIMS ARE BARRED BY RES JUDICATA

Res judicata gives "conclusive effect to a former judgment in subsequent litigation involving the same controversy." (*Boeken v. Philip Morris* (2010) 48 Cal.4th 799, 797.) It "operates as a bar to the maintenance of a second suit." (*Ibid.*) "'The prerequisite elements for applying the doctrine to either an entire cause of action or one or more issues are the same: (1) A claim or issue raised in the present action is identical to a claim or issue litigated in a prior proceeding; (2) the prior proceeding resulted in a final judgment on the merits; and (3) the party against whom the doctrine is being asserted was a party or in privity with a party to the prior proceeding. [Citations.]'" (*Ibid.* citing *People v. Barragan* (2004) 32 Cal.4th 236, 252, 253.)

Parent Plaintiffs' action is barred by res judicata. The basis for these claims and the issues in dispute was already litigated in their prior lawsuit filing in 1996. (RJN ¶¶ 1-5.) Res judicata encompasses the related concepts of claim preclusion and issue preclusion, and intends to promote judicial economy as "claims based on the same cause of action must be decided in a single suit." (*Mycogen Corp. v. Monsanto Co.* (2002) 28 Cal.4th 888, 896-97, fn. 7.) "A predictable doctrine of res judicata benefits both the parties and the courts because it 'seeks to curtail multiple litigation causing vexation and expense to the parties and wasted effort and expense in judicial administration.'" (*Id.* at p. 896, citations omitted.)

The question is not whether the causes of action are named and phrased the exact same way, but instead whether they seek to recover for a violation of the same "primary right." (*Mycogen Corp., supra,* 28 Cal.4th at p. 904.) A plaintiff has a right to be free from a particular injury suffered, and that is the primary right – claim preclusion applies whether the legal theory and names of the requested recovery change. (*Crowley v. Katleman* (1994) 8 Cal.4th 666, 681, as modified (Nov. 30, 1994).) The prior lawsuit brought by Parent Plaintiffs based on the death of Kirstin Smart is an absolute bar to their current claims and the court should sustain the demurrer without leave to amend.

E. NO STATUTORY BASIS FOR LIABILITY

The Complaint is barred by the failure to allege a statutory basis for liability. Any plaintiff seeking to sue the State of California has to satisfy a heightened pleading standard: "[t]he limited and statutory nature of governmental liability mandates that claims against public entities must be specifically pleaded." (*Brenner v. City of El Cajon* (2003) 113 Cal.App.4th 434, 439.) Claims against public entities "may not rely on generalized allegations." (*Ibid.*) Rather, "'every fact material to the existence of [the public entity's] statutory liability must be pleaded with particularity.'" (*Lopez v. Southern Cal. Rapid Transit Dist.* (1985) 40 Cal.3d 780, 795, quoting *Peter W. v. San Francisco Unified Sch. Dist.* (1976) 60 Cal.App.3d 814, 819.) This requires pleading a statutory basis for liability. (Gov. Code, § 815; *Horvath, supra,* 16 Cal.3d at p. 838.)

State liability is thus only applied when there is specific statutory liability on point. The State is immune "[e]xcept as otherwise provided by statute." (Gov. Code, § 815.) The three causes of action in the Complaint do not identify a statutory basis, making these causes of action the exact "generalized allegations" that the Government Code prohibits (*Brenner, supra,* 113 Cal.App.4th at p. 439.) Because there is no statute that provides liability under these facts, the Court should sustain the demurrer without leave to amend.

F. STANDING FAILURES

Plaintiffs lack standing to bring their claims. Family members such as parents or siblings, cannot bring negligence causes of action based on a harm suffered by that family member. (*Thing v. La Chusa* (1989) 48 Cal.3d 644, 669.) As a result, plaintiffs cannot maintain their claims for negligence or negligent infliction of emotional distress. In *Thing v. La Chusa*, a mother attempted to claim emotional distress for her child's injuries although she was not present at the time of the accident. The California Supreme Court held, "a plaintiff may recover damages for emotional distress caused by observing the negligently inflicted injury of a third person if, but only if, said plaintiff: (1) is closely related to the injury victim; (2) is present at the scene of the injury-producing event at the time it occurs and is then aware that it is causing injury to the victim; and (3) as a result suffers serious emotional distress -- a reaction beyond that which would be anticipated in a disinterested witness and which is not an abnormal response to the

circumstances.. (*Id.* at pp. 668-9.) In this matter, Plaintiffs were not present at the murder of Kristin Smart and therefore cannot recover under theories of negligence and negligent infliction of emotional distress.

Further, the Sibling Plaintiffs lack standing to bring a claim for wrongful death. Code of Civil Procedure section 377.60 provides the specific framework for standing to bring a wrongful death claim. Under this statute, since the Parent Plaintiffs are alive (and bringing their own wrongful death claims) the Sibling Plaintiffs are not allowed under the Code to bring such an action- as they have no standing (Code Civ. Proc., § 377.60, subd, (a).). While the propriety of the Plaintiff Parents bringing a wrongful death claim is discussed above, the Sibling Plaintiffs lacks standing and are prohibited from bringing such a claim.

G. THE UNIVERSITY IS IMMUNE FROM LIABILITY

1. Government Code Section 845 Immunity

The University is immune from liability based on the factual allegations in the Complaint. As a matter of law, there is no liability for failure to prevent a crime or for the exercise of discretionary duties. A plaintiff cannot sue a public entity for failing to prevent a crime. (Gov. Code, § 845.) "Neither a public entity nor a public employee is liable for failure to establish a police department or otherwise to provide police protection service or, if police protection service is provided, for failure to provide sufficient police protection service." (*Ibid*.) Immunity is the rule not the exception. (*Horvath, supra,* 16 Cal.3d at p. 838.)

Police departments are not liable for a criminal's commission of a crime except in specific circumstances where the police induce reliance and increase the threat of the crime. "Where the gravamen of the complaint is a police failure to act reasonably in protecting members of the public from the harm caused by a third person (i.e., nonfeasance), a series of recent Supreme Court cases make clear that the liability of the governmental entity is narrowly circumscribed." (*Lopez v. City of San Diego* (1987) 190 Cal.App.3d 678, 681.) The question relies on "representations or conduct by the police which cause the victim(s) to detrimentally rely on the police. . ." that increase the risk of the harm for the victim. (*Ibid*).

The Court previously sustained the demurrer to the 1997 Complaint based on immunity.

(RJN ¶ 3.) Although Parent Plaintiffs based the earlier lawsuit on premises liability, the factual allegations are identical and based on the murder of Kirsten Smart and the alleged failure to protect her from the criminal act committed by Paul Flores. On December 12, 1997, the Court sustained the demurrer to Parent Plaintiff's complaint stating, "any failure by the university to provide additional security is immunized by Government Code section 845." (RJN ¶ 3.)

There is no allegation of any special relationship, or any representations by the University. None of the University employees are named defendants. As a result, Government Code section 845 immunity bars plaintiffs' claims just as it did in 1997. There has been no change in the law since section 845 required dismissal, and so the Court should again dismiss all three causes of action on those grounds.

In addition to section 845 immunity: "Neither a public entity nor a public employee is liable for injury caused by the failure to make an arrest or by the failure to retained an arrested person in custody." (Gov. Code, § 846.) Here, the Complaint alleges insufficient protection and that the University's police department did not do enough to remove Paul Flores before he committed murder or solve the murder quickly. (Compl. ¶¶ 89-90, 98, 102-107.) This is precisely the type of claim that Section 846 prevents finding Defendant liable upon.

2. Government Code Section 820.2 Immunity

Other immunities are also a bar to the allegations in the Complaint. Government Code section 820.2 immunizes discretionary acts that government employees make. "Except as otherwise provided by statute, a public employee is not liable for an injury resulting from his act or omission where the act or omission was the result of the exercise of the discretion vested in him, whether or not such discretion be abused." (Gov. Code, § 820.2.) Simply alleging that the University failed to "reasonably investigate" (Compl. ¶ 89) or "conduct a reasonable investigation" (Compl. ¶ 99) does not overcome immunity. Officers are empowered with discretion to investigate crimes. Section 820.2 immunizes the officers for their discretionary acts in this regard. If the allegations are that the individual police officers employed by the University were negligent, then their discretionary decision to investigate or not investigate is precisely what discretionary immunity protects.

3. Government Code Section 820.8 Immunity

Government Code section 820.8 prevents a victim of a crime (or her extended family) from alleging that the University is liable for the crimes of another. "Except as otherwise provided by statute, a public employee is not liable for an injury caused by the act or omission of another person. Nothing in this section exonerates a public employee from liability for injury proximately caused by his own negligent or wrongful act or omission." (Gov. Code, § 820.8.) This statutory immunity bars plaintiffs' claims because the University is not liable for the crime committed by Paul Flores.

IV. CONCLUSION

Plaintiffs' claim are barred by the statute of limitation, failure to comply with the Government Claims Act, res judicata, failure to allege a statutory basis for liability, lack of standing and immunity. Therefore, this Court should sustain the demurrer to plaintiffs' Complaint without leave to amend.

Dated: April 2, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
CATHERINE WOODBRIDGE
Supervising Deputy Attorney General

Andrew Adams

ANDREW F. ADAMS
Deputy Attorney General
Attorneys for Defendant Board of Trustees of the California State University

DECLARATION OF ANDREW ADAMS

I, ANDREW ADAMS, HEREBY DECLARE:

1. I am an attorney at law, duly licensed to practice before the courts of the State of California, a Deputy Attorney General and counsel of record in the instant matter.

2. I met and conferred with Plaintiffs' counsel multiple times by phone and email as is required by Code of Civil Procedure section 430.41. The discussions were frank and productive, however they did not result in a negotiated resolution to this matter

3. I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California and that this declaration was executed on April 2, 2024, in Los Angeles, California.

Andrew Adams

Andrew F. Adams