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Petitioner, *in propria persona*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

BRUCE THOMAS MURRAY, Petitioner, v. **MEDICAL BOARD OF CALIFORNIA; KIMBERLY KIRCHMEYER**, in her capacity as executive director, Medical Board of California; and **KERRIE D. WEBB**, in her capacity as staff counsel, Medical Board of California Respondents	Case No.: BS158575 PETITIONER'S MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO RESPONDENTS' DEMURRER [FILED CONCURRENTLY WITH PETITIONER'S MOTION IN OPPOSITION TO RESPONDENTS' DEMURRER] Date: May 3, 2016 Time: 9:30 a.m. Dept: 82 Judge: Mary H. Strobel Action filed: Oct. 5, 2015

INTRODUCTION

Petitioner filed a single amended petition in this case to include facts that he had previously omitted for the sake of brevity. The inclusion of the additional facts for the record was intended to address the central basis of Respondents' first demurrer – that Petitioner's claims were not ripe for review due to lack of finality and that Petitioner purportedly failed to exhaust his administrative remedies. Respondents' second demurrer adds little to the first and does not take into account the additional pleaded facts that more fully establish exhaustion, finality and ripeness.

Respondents' second demurrer contains several problems. First, Respondents conflate the jurisprudential doctrine of ripeness with the jurisdictional doctrine of finality and the doctrine of exhaustion of administrative remedies. Although all of these doctrines are related, they each have different rules and elements, which Respondents do not properly state or analyze. This memo will define and analyze each doctrine, and explain how they are interrelated.

Second, by conflating the doctrines of exhaustion, finality and ripeness, Respondents subtly transform and "treat" this case as if it were an action for administrative mandate under Cal. Code Civ. Proc. § 1094.5, which it is not. This is an action for traditional (or "ordinary") mandate under Cal. Code Civ. Proc. § 1085. Many of the rules and procedures governing each form of action overlap, but they are not the same. More specifically, the concept of finality applies very differently in the context of a statutory or regulatory scheme than it does in a broader sense – outside of a statutory scheme. Since Petitioners' case involves claims both based on a statutory scheme, the California Public Records Act, and claims outside of CPRA's regulatory scheme – if it can even be called that – this distinction is important. Therefore, this memorandum will analyze each cause of action accordingly, and under the complete applicable rule statement.

Thirdly and most egregiously, in their analysis of finality, Respondents inappropriately place legal meaning on precatory words of salutation, i.e., "Please feel free to contact me if you have any other further questions" – as Respondent Kerrie Webb wrote in her final communication to Petitioner. (Am. Pet. Exh. 9.) In a gaping stretch of reason, Respondents' claim these salutary words somehow alter the finality of Respondents' total and complete denial of Petitioners' request for information. In reality, Respondents' denial was so absolute and unqualified, its decision was in fact final, and any further appeal on Petitioners' part would have been futile.

Respondents' demurrer therefore should be overruled in its entirety because Petitioner has clearly stated a cause of action that is ripe, judicially cognizable, and the facts plainly show that Petitioner has no other alternative but to turn to the court for mandamus.

II. STATEMENT OF FACTS

1. Petitioner incorporates by reference all of the factual allegations of his amended petition as though fully set forth herein. Petitioner has no additional factual allegations to add, but will briefly highlight and categorize the facts here, primarily as the facts relate to the doctrines of exhaustion of administrative remedies, finality and ripeness – the central bases of Respondents' demurrer.

2. Fact-paragraphs 9-20 in the amended petition show Petitioner interacting with various employees of the Medical Board and requesting various types of information. Among the items of information he requested, Petitioner sought Dr. James Matchison's required filings under Cal. Bus. & Prof. Code § 2240 (Report for Death of Patient) and 16 C.C.R. § 1356.4 (Outpatient Surgery-Reporting of Death). [Am. Pet., Exh. 4.] All of these requests were either ignored or denied.

3. In a letter dated Feb. 10, 2015, Petitioner appealed the lower-level staff denials to the Medical Board's staff counsel, Respondent Kerrie Webb. (Am. Pet., Exh. 8.)

4. In a letter dated Feb. 20, 2015, Respondent Webb denied Petitioner's request for the referenced documents. Webb cited three bases for her denial and offered no plausible expectation of a reversal of her position. (Am. Pet. Exh. 9.)

5. In a document dated April 14, 2015, the Medical Board provided Petitioner with its final report regarding case number 800 2014 005263. The final report contains none of the information Petitioner sought in his initial complaint to the board. (Am. Pet. Exh. 1.)

6. Oct. 5, 2015, Petitioner filed a petition for writ of mandate under Cal. Code Civ. Proc. § 1085 and declaratory and injunctive relief under and Cal. Gov. Code §6258.

7. Nov. 23, 2015, Respondents filed a demurrer to the petition.

8. Jan. 2, 2016, Petitioner filed an amended petition.

9. Feb. 8, 2016, Respondents demurred to the amended petition.

ARGUMENT

I. APPLICABLE LEGAL STANDARDS

A. Demurrer based only on the pleadings; no extrinsic facts

A demurrer tests the pleading alone and not the evidence or other extrinsic matters. *Garton v. Title Ins. & Trust Co.* 106 Cal App 3d 365 (1980). A demurrer can be used only to challenge defects that appear on the face of the pleading under attack or from matters outside the pleading that are judicially noticeable. *Blank v. Kirwan* (1985) 39 Cal.3d 311, 318; Cal. Code Civ. Proc. § 430.30. For purposes of a demurrer, the defendant admits the truth of all material facts pleaded in the complaint. *Serrano v. Priest* (1971) 5 Cal.3d 584, 591.

B. Pleadings to be liberally construed

"In the construction of a pleading, for the purpose of determining its effect, its allegations must be liberally construed, with a view to substantial justice between the parties." Cal. Code Civ. Proc. § 452

C. Ripeness

"The ripeness requirement, a branch of the doctrine of justiciability, prevents courts from issuing purely advisory opinions. It is rooted in the fundamental concept that the proper role of the judiciary does not extend to the resolution of abstract differences of legal opinion. … A controversy is 'ripe' when it has reached, but has not passed, the point that the facts have

sufficiently congealed to permit an intelligent and useful decision to be made." *Pac. Legal Found. v. Cal. Coastal Com.,* 33 Cal. 3d 158, 170, 171, (1982).

II. THE RESPONDENTS' DEMURRER SHOULD BE OVERRULED BECAUSE PETITIONERS' CLAIMS ARE RIPE BASED ON FINALITY AND EXHAUSTION OF ADMINISTRATIVE REMEDIES; AND PETITIONERS' CLAIMS ARE RIPE AS A JURISPRUDENTIAL MATTER

Respondents assert that all five causes of action contained in Petitioner's amended petition are not ripe based on "the doctrines of ripeness or finality." (Resp'ts' P. & A. in supp. of Dem. to 1st Am. Pet. at 4:23-24.) Respondents invoke finality, but instead quote the rule – or a fragment of it – for the doctrine of exhaustion of administrative remedies, and imply that Petitioner somehow failed in this regard. *Id.* at 4:24, 5:7. Although the doctrines of exhaustion of administrative remedies, finality and ripeness are all related, they each have different elements and apply differently depending on the context. Respondents' demurrer splices together fragmentary definitions these doctrines, and then proceeds to misanalyse them. A proper analysis of all of these doctrines, applied in the appropriate context, will show – *a fortiori* – that Petitioner satisfied all of them, and that all of his causes of action are ripe for review.

A1. Finality in the context of a statutory scheme

Section IIA of Respondents' demurrer begins with an incomplete rule statement for the doctrine of exhaustion of administrative remedies, but identifies it as "the doctrine of ripeness or finality." *SJCBC LLC v. Horwedel,* 201 Cal. App. 4th 339, 350 (2011); but see *Coachella Valley Mosquito & Vector Control Dist. v. Cal. Pub. Emp't Relations Bd.,* 35 Cal. 4th 1072, at 1081 (2005). Bumping up against the first quote, Respondents' demurrer contains another partial rule statement for the doctrine of finality from *Cal. Water Impact Network v. Newhall Cnty. Water*

Dist., 161 Cal. App. 4th 1464, 1485 (2008). After splicing and conflating the doctrines, the demurrer fails to list the elements. Subsequently and not surprisingly, the analysis goes awry.

For clarity and completeness (and from Respondents' own featured case), the elements of the doctrine of finality are as follows: "Finality may be defined either [1] expressly in the statutes governing the administrative process or [2] it may be determined from the framework in the statutory scheme." *Id.*

The *Newhall* case, and the Respondents' other featured case, *SJCBC v. Horwedel,* each consider the issue of finality within a governing statutory scheme – the California Water Code in *Newhall,* and the San Jose Municipal [Zoning] Code in *Horwedel.* In each of those cases, the respective statutory schemes set out a process for administrative remedies, including complaints, hearings and appeals. Because these types of statutory schemes incorporate various aspects of procedural due process, it is not surprising that the California doctrine of finality is most often applied in in cases of administrative mandate brought under Cal. Code Civ. Proc § 1094.5, rather than traditional or ordinary mandate under Cal Code Civ Proc § 1085; although the doctrine is not exclusive to either form of mandate. (See *Newhall,* 161 Cal. App. 4th at 1483 n.19). It is noteworthy that Respondents' first quoted case, *Horwedel,* was an administrative mandate case brought exclusively under § 1094.5; and the Petitioners prevailed on the finality issue there because the Respondent city's "alleged administrative remedy was illusory, and pursuing it would have been futile." *Id.* at 345.

In the present case, only Petitioner's first and third causes of action involve a statutory scheme – the California Public Records Act – that might be said to provide remedies analogous to the administrative mandate cases cited by Respondents. Here, Petitioner requested information from Respondents and was ignored and denied (Am. Pet at 4, 5); Petitioner properly filed a freedom of information request with Respondents' under Cal. Gov. Code § 6253.1 (Am. Pet.,

Exh. 8); Respondents again denied his request; Petitioner then instituted this action for a writ of mandate under Cal. Code Civ. Proc. § 1085 and Cal. Gov. Code § 6258. The California Public Records Act required nothing else of Petitioner in order to satisfy finality or exhaust his administrative remedies. Indeed, Respondents' demurrer makes no allegation that Petitioner failed to establish finality or exhaust his administrative remedies under CPRA. In fact, Petitioner fully complied with CRPA and exhausted all of the "administrative remedies" provided by the statute – to the extent that CRPA can be considered administrative or procedural at all (the law is primarily substantive, i.e., "access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in this state." Cal. Gov't Code § 6250). Thus, Petitioner satisfied his statutory exhaustion and finality requirements regarding his first and third causes of action under CPRA. On this basis, Respondents' demurrer to Petitioner's first and third causes of action should be overruled.

A2. Legal meaning improperly applied to precatory words of salutation

In its analysis of finality, Respondents' inappropriately place legal meaning on precatory words of salutation, i.e., "Please feel free to contact me if you have any other further questions." (Am. Pet. Exh. 9.) These passing words do not in any way alter the finality of Respondents' decision to deny Petitioners' request for information.

The issue of precatory words occurs most often in the law of property and will and trusts. "Precatory words express a hope, wish, desire, recommendation, or suggestion. When included in a will, they do not have the effect of a command or charge and are not legally enforceable." 1-24 California Wills & Trusts § 24.05.

Similarly here, closing a letter with a "feel-free-to-contact-me" salutation is simply a formal and polite way of ending a letter, and not a technical procedural intermediate interlocutory action of an administrative agency, as Respondents' attempt to argue. By selecting

these words, Respondent Webb is simply closing the door softly rather than slamming it shut. To divine any legal meaning into this letter's closing statement is ludicrous.

To quote the *Horwedel* court, "We do not believe the Doctrine [of exhaustion] was designed or intended to shield administrative actions from any review." *Id.* at 350. That is precisely what Respondents are attempting to do here – first by bureaucratic stonewalling, and now by preposterous legal arguments. Therefore, Respondents' demurrer to Petitioner's First Cause of Action should be overruled.

A3. Respondents admit finality and exhaustion in their own demurrer

In sections III and IV or Respondents' Points & Authorities, Respondents essentially admit finality and exhaustion.

"To the extent that Petitioner contends Respondents failed to assist him in identifying records and information that are responsive to the request or the purpose of the request, pursuant to Government code section 6253.1, subdivision (a)(1) (Am. Pet. at 12), **no such obligation exists** in circumstances, **such as here, wherein the public agency <u>has determined</u> that the request should be denied** based upon an exemption listed in Government Code section 6254." (Resp'ts' P. & A. in supp. of Dem. at 8:21-26.) [Emphasis added.]

By its plain language and on its face, this statement is an admission of finality. Further:

"The records of investigation are privileged, and **Respondents properly refused** Petitioner's request for such records." (*Id.* at 8:21-26.) [Emphasis added.]

Again, by its plain language, this statement should be taken as an admission of finality – and hence, exhaustion and ripeness. These statements obviously contradict Respondents' assertion of lack of finality. On this basis, Respondents demurrer to Petitioner's First Cause of Action should be overruled.

A4. Exception to the doctrine of exhaustion of administrative remedies – Futility

Respondents, by quoting part of the rule for exhaustion and alleging that Petitioner failed to "meet and confer" with them, is essentially alleging that Petitioner failed to satisfy the doctrine of exhaustion of administrative remedies – although not so designated with an issue heading in their Points & Authorities. Again, the rest of the rule, from Respondents' own featured case: "The Doctrine refers to the requirement that … a party must exhaust administrative remedies before resorting to the courts. Under this rule, an administrative remedy is exhausted only upon termination of all available, nonduplicative administrative review procedures." *Id.* at 346.

More importantly in the instant case, the exception to the rule: "The Doctrine has not hardened into inflexible dogma. It recognizes exceptions, for example, when the administrative remedy is unavailable, when it is inadequate, or when it would be futile to pursue it." *Id.*

Here, the record plainly shows that Respondents stonewalled Petitioner every step of the way. As shown in Paragraphs 9-20 in the amended petition, Petitioner made numerous requests for information from the Medical Board, and he was ignored and rebuffed every time. Petitioner then appealed these denials to the Medical Board's staff counsel, Kerrie Webb. (Am. Pet., Exh. 8.) Respondent Webb responded to this appeal with a complete and categorical rejection. At this point, realistically, there was nothing left to pursue. Respondents clearly evinced no intention whatsoever of releasing any information. Petitioner was "exhausted," and any further inquiry would have been futile.

Furthermore, duplicative exhaustion "for show" is not required. As the court noted, "It is not necessary to seek reconsideration or rehearing in order to raise for a second time the same evidence and legal arguments previously presented to the agency, solely to exhaust administrative remedies." *Sierra Club v. San Joaquin LAFCO,* 21 Cal. 4th 489, 510 (1999).

For all of these reasons, Respondents demurrer to Petitioner's First Cause of Action should be overruled.

B. Petitioner's claim is certain

Respondents assert that Petitioner's claim is uncertain pursuant to Cal. Code Civ. Proc § 430.10(f); but again, Respondents fail to state the legal standard for certainty/uncertainty, and they fail to provide a corresponding analysis.

The court's longstanding views on certainty include the following: "A general statement, if comprehensive and complete, although it may in the proof involve details, cannot be arraigned as indefinite or uncertain." *Gardner v. Cal. Guarantee Inv. Co.,* 137 Cal. 71, 76 (1902). "The objection of uncertainty does not go to failure to allege sufficient facts but to doubt as to what the pleader means by the facts alleged." *Brea v. McGlashan,* 3 Cal App 2d 454 (1934).

Here, Respondents make the conclusory assertion that Petitioner's claim is uncertain, but then go on to say "he appears to allege …" and proceed summarize portions of his claim. (Resp'ts' P. & A. in supp. of Dem. at 5:13-18.) Based on Respondents' own partial restatement of Petitioner's claim, it is doubtful that they had any doubt as to the meaning of his words. Respondents' assertion of uncertainty is simply gratuitous, and therefore should be overruled.

C. Respondents assert invalid bases for privilege

Respondents assert privilege over the various documents Petitioner seeks – among them the physician's required filings under Cal. Bus. & Prof. Code § 2240 (Report for Death of Patient) and 16 C.C.R. § 1356.4 (Outpatient Surgery-Reporting of Death). Respondent Webb justified withholding Petitioner's requests for information by (1) claiming such information is exempt from disclosure under Cal. Gov. Code § 6254(f), because, (2) she asserted, "[r]eports for the death of a patient are treated as complaints to the Board, and will not be disclosed." [Am. Pet, Exh. 9.] Respondents' demurrer reiterates these assertions and again fails to cite any authority

indicating who, how or why such reports "are treated" as complaints to the board, and thus falling under the exemption of Cal. Gov. Code § 6254(f).

A legal fiction is "a false averment of fact … [or] pretense … which, if true, would lead to the desired result under established rules of law." J.H. Baker, *An Introduction to English Legal History* (Butterworths 1979).

Here, calling reports for the death of a patient "complaints to the board" is the false averment. And by so designating such reports as "complaints to the board," Respondents invent a sufficient condition, which then leads to the desired necessary result – nondisclosure. This is precisely how a legal fiction operates, and it should not be allowed here.

Because the Respondents' refusal to release the requested documents (or the equivalent underlying information) is based on a legal fiction rather than case law or statute, Respondents' demurrer to Petitioner's First Cause of Action should be overruled.

D1. Respondents add extrinsic evidence in their denial of the existence of records

Respondents assert in their demurrer that the records sought by Petitioner do not exist, and in so doing impermissibly plead a new fact that is not on the face of the Petition.

"A demurrer looks only to the face of the pleadings and matters judicially noticeable, not to the evidence or other extrinsic matters." *Knickerbocker v. City of Stockton,* 199 Cal.App.3d 235, 239 n.2 (1988). A defendant cannot set forth allegations of fact in a demurrer which, if true, would defeat plaintiff's complaint. *Gould v. Maryland Sound Industries, Inc.*, 31 Cal App 4th 1137 (1995).

Respondents' demurrer does precisely what the rules of demurrer prohibit. Respondents' statement denying the existence of the said documents is evidence, extrinsic of the pleadings, and therefore inappropriate for a demurrer. Not only do Respondents make this statement directly, but they also attempt to establish that the documents don't exist through a false reading of the

pleadings. Respondents inaccurately state, "the Petition establishes that the patient care occurred at Torrance Memorial Hospital." (Resp'ts' P. & A. in supp. of Dem. at 7:10-11.) In fact, the location of the "patient care" that is central to this action is not stated on the Petition. The Petition only states that Petitioner's mother died in the Torrance Memorial emergency room. But the Petitioner is not complaining about his mother's emergency care; he is inquiring into the elective procedure that took place approximately 30 hours prior to her death. Indeed, the location of this procedure is part of the information Petitioner seeks from Respondents in this action, under 16 CCR 1356.4(c).

After rewriting the pleadings to their convenience, Respondents then use this fabricated allegation as a sufficient condition to state their desired necessary result, i.e., "there was no duty to create such reports in this case, and the Board is not in possession of the records sought by Petitioner." *Id.* at 7:13-14. This deduction is based on fiction, and the resulting factual and legal conclusions are improper additions of extrinsic information in a demurrer. Respondents are essentially trying to sneak an answer into their demurrer, and this should not be permitted. Therefore, Respondents demurrer to Petitioner's First Cause of Action should be overruled.

D2. Respondents acknowledged the existence of the records Petitioner seeks

In his Feb. 10, 2015 letter to Kerrie Webb, Petitioner requested copies of Cal. Bus. & Prof. Code § 2240 and 16 CCR § 1356.4, as the performing surgeon was required to file. (Am. Pet., Exh. 8). In her Feb. 20, 2015 response to Petitioner, Respondent Webb denied Petitioner's request to disclose these particular documents. Her refusal to disclose these specific documents presupposes their existence; otherwise there would be nothing to refuse. Refusing to release non-existent documents is illogical. The logical inference to be derived from Respondents' actions in denying Petitioner access to these records is that the records do in fact exist; and Respondents have admitted their existence.

For this reason and all of the other reasons stated above, Respondents demurrer to Petitioner's First Cause of Action should be overruled.

III. Petitioner's claims under the Evidence Code are ripe because Petitioner has stated valid claim invoking the operation the balancing test under Cal. Evid. Code § 1040

Respondents' demurrer makes the conclusory assertion that the information he seeks is privileged pursuant to Cal. Gov. Code § 6254 and Cal. Evid. Code § 1040. This assertion echoes prongs 1 and 3 of Respondent Webb's Feb. 20, 2015 letter to petitioner. (Am. Pet., Exh. 9.) As explained in the Amended Petition (at 10:10), Respondents' assertion of privilege under § 6254 depends on the legal fiction that a doctor's mandatory reporting to the Medical Board constitutes a "complaint to the board." (See "prong 2" of Webb's denial. *Id.*) Applying this fiction as the first sufficient condition in their syllogism, Respondents weave a Gordian knot of absolute privilege.

Again, Respondents do not state the applicable rules or case law in their demurrer. As stated in the Amended Petition, "The provisions of section 6254 of the Government Code cannot serve as a basis of absolute privilege under Evidence Code section 1040, subdivision (b)(1)." *Shepherd v. Super. Court*, 17 Cal. 3d 107, 123 (1976).

In accordance with this rule, Petitioner asks that this court consider the information he requests under the qualified privilege – and balancing test – set forth in Cal. Evid. Code § 1040(b)(2). In so pleading, this claim and request for relief are fully cognizable under Cal. Code Civ. Proc § 425.10, and hence, ripe for review. This claim is also ripe for the reasons set forth in II above, and IV below. Therefore, Respondents' demurrer to Petitioner's Second Cause of Action should be overruled.

IV. RESPONDENTS' DEMURRER TO PETITIONER'S THIRD CAUSE OF ACTION SHOULD BE OVERRULED BECAUSE PETITIONER'S CLAIM IS RIPE, STATES FACTS SUFFICIENT TO CONSTITUTE A CAUSE OF ACTION; AND THE CLAIMS ARE CERTAIN

Respondents' demurrer to Petitioner's Third Cause of Action should be overruled for the same reasons set forth in II above.

V-VI. PETITIONER'S CLAIMS UNDER THE STATE CONSTITUTION AND PUBLIC POLICY ARE RIPE AND STATE FACTS SUFFICENT TO CONSTITUTE A CAUSE OF ACTION

Respondents' demurrer asserts that Petitioner's claims under the California Constitution and public policy are not ripe for review. Again, Respondents' assertions are conclusory, fail to state the applicable rule for ripeness under the state constitution or public policy, and they fail to do the corresponding analysis.

Unlike the ripeness analysis in the first and third causes of action, the Fourth Cause of Action does not involve a statutory scheme for remedies or procedural due process. Thus, the doctrine of exhaustion of administrative remedies does not apply here. Neither does the doctrine of finality, in the sense that it applies in administrative law. Here, a more general concept of finality applies to ripeness. In this broader sense, finality is a necessary– but not a sufficient condition for ripeness.

"It is settled that the law of this state includes the common law as well as the Constitution and the codes … As a general rule, where a statute creates a right that did not exist at common law and provides a comprehensive and detailed remedial scheme for its enforcement, the statutory remedy is exclusive. But where a statutory remedy is provided for a preexisting

common law right, the newer remedy is generally considered to be cumulative, and the older remedy may be pursued at the plaintiff's election." *Rojo v. Kliger,* 52 Cal. 3d 65, 74, 79 (1990).

Here, Petitioner's Fourth Cause of Action arises under the California Constitution, and his Fifth Cause of Action is based on public policy. Neither of these claims is based on a statutory scheme involving administrative remedies. Thus, the basic jurisprudential principles of ripeness apply. As stated by the California Supreme Court, the test for ripeness is as follows: (1) the fitness of the issues for judicial decision, and (2) the hardship to the parties of withholding court consideration. The first prong analyzes primarily whether the claims are sufficiently "concrete," rather than "in the abstract" – thus inviting the court improperly to speculate as to a proper course of action. *Pac. Legal Found.* 33 Cal. 3d at 315.

Here, as analyzed above, Respondents' rejections to Petitioner's requests for information were total, absolute and final. As a result, Petitioner has suffered a concrete injury in fact that is ripe for review. Petitioner therefore seeks tangible relief in the form of mandamus (not an advisory opinion). Petitioner has no other remedy at law. For these reasons, Respondents' demurrer to Petitioner's fourth and fifth causes of action should be overruled.

CONCLUSION

Petitioner requests that the Court overrule Respondents' demurrer, without leave to answer, and enter judgment in favor of Petitioner and compel the release of the information that he requests.

Dated: April 14, 2016

By: Bruce Thomas Murray, Esq.
Petitioner, in pro per
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