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6 *Attorneys for Proposed Intervenor Los Angeles County District Attorney*

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

11 JANE BP1-B DOE; JANE ML2-BDOE; JANE  
TE3-B DOE; JANE GK4-B DOE; JANE PY5-B  
DOE; JANE TF6-B DOE; JANE BR7-B DOE;  
12 JANE DY8-B DOE; JANE GF9-B DOE; JANE  
DL10-B DOE; JANE RL11-B DOE; JANE CJ12-  
13 B DOE; JANE MT13-B DOE; JANE PT14-B  
DOE; JANE JK15-B DOE; JANE GK16-B DOE;  
14 JANE VP17-B DOE, JANE FD18-B DOE, and  
JANE MF19-B DOE, individuals,

15  
16 Plaintiffs,

17 v.

18 DOE 1, a governmental entity; DOE 2, an  
individual; DOE 3, an individual; DOE 4, an  
individual; DOE 5, an individual; DOE 6, an  
19 individual; DOES 7 through 500, inclusive,

20 Defendants.

21 AND ALL RELATED CASES  
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Case No.: 22STCV25961

***[LAC Camp Cases - Lead Case 22STCV25961]***

**LOS ANGELES COUNTY DISTRICT  
ATTORNEY'S *EX PARTE* APPLICATION  
TO INTERVENE AND FOR A LIMITED  
STAY OF SETTLEMENT DISTRIBUTIONS**

*[Proposed] Order filed concurrently*

Action Filed: August 11, 2022

***EX PARTE HEARING***

Date: June 15, 2026

Time: 8:30 a.m.

Court: Stanley Mosk

Dept.: 534

**EX PARTE APPLICATION**

2 Proposed Intervenor Los Angeles County District Attorney (“District Attorney”) applies *ex*  
3 *parte* for an order:

- 4 1. Granting leave to intervene pursuant to California Code of Civil Procedure § 387;
- 5 2. Staying for six months until December 31, 2026, the payment and disbursement of any  
6 settlement funds to any plaintiffs in any of the related lawsuits alleging sexual abuse at the Los  
7 Angeles County’s juvenile probation camps and halls (the “Camp Cases,” Lead Case No.  
8 22STCV25961) in order to preserve the settlement fund for valid child sex abuse survivor claims and  
9 maintain the status quo pending completion of critical stages of the District Attorney’s ongoing  
10 criminal investigation into fraud concerning a significant number of plaintiffs’ lawsuits involved in  
11 the settlement; and
- 12 3. Granting such further relief as the Court deems just and proper.

13 The District Attorney’s Application is based on this Notice of *Ex Parte* Application, the  
14 supporting Memorandum of Points and Authorities, the Declaration of Nathan J. Hochman and the  
15 letter from District Attorney Hochman to Andrew Baum, counsel for the County of Los Angeles,  
16 filed herewith as Exhibit A, any additional exhibits, the Proposed Order, the arguments of counsel  
17 made when this Application is heard, and upon such other evidence and materials as this Court may  
18 consider.

19 **RULE 3.1202 INFORMATION**

20 Pursuant to Rule 3.1202(a), the Case Anywhere service list identifying counsel of record in  
21 the Camp Cases is submitted herewith as Exhibit B. (*See* Declaration of Nathan Hochman  
22 (“Hochman Decl.”), Ex. B.)

23 The District Attorney has not previously applied for the *ex parte* relief sought in this  
24 Application. *See* Cal. R. Ct. 3.1202(b).

25 **EX PARTE NOTICE**

26 Pursuant to California Rules of Court, Rule 3.1203(a), notice of this *Ex Parte* Application  
27 was e-mailed to counsel for plaintiffs on Tuesday June 9, 2026, at approximately 5:51 pm, to  
28

provide notice of the District Attorney's intent to appear before the Court ex parte on Thursday,  
2 June 11, 2026 at 8:30 a.m.

3 The notice emails to counsel sought confirmation of whether plaintiffs would oppose, concur  
4 or take no position regarding the District Attorney's Application. By 9:00 am June 10, 2026, the  
5 following responses were received: oppose the application (Abir Cohen Treyzon Salo LLP, Becker  
6 Law Group, Clarckson Law Firm P.C, D. Miller & Associates PLLC, McNicholas & McNicholas  
7 LLP, Peiffer Wolf Carr Kane Conway & Wise, Slater Slater Schulman LLP, The Lewis Farmer Law  
8 Group, and Waters Kraus Paul & Siegel), concur with application ( Aylstock, Witkin, Kreis,&  
9 Overholtz PLC, Bana Legal Group, Carillo Law Firm LLP, El Dabe Ritter Trial Lawyers, Engstrom,  
10 Lipscomb & Lack, Gould Grieco & Hensley, Jason J. Joy & Associates, Law Offices of Lee Paul  
11 HalladaManly, Stewart, Finaldi & Thom).

12  
13 DATED: June 11, 2026

LOS ANGELES COUNTY DISTRICT ATTORNEY

14 By: /s/ Nathan J. Hochman  
15 NATHAN J. HOCHMAN  
16 District Attorney  
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## MEMORANDUM OF POINTS AND AUTHORITIES

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3           The Camp Cases involve thousands of related lawsuits alleging sexual abuse at the Los  
4 Angeles County’s juvenile probation camps and halls over the past approximately 60 years. A multi-  
5 billion settlement has been entered into by the parties to resolve thousands of these lawsuits. To  
6 date, no funds from that settlement have been paid or disbursed to any plaintiff.

7           As further described in Exhibit A attached to the Declaration of Nathan J. Hochman (District  
8 Attorney Nathan J. Hochman’s letter to Andrew Baum dated May 21, 2026), over the past number  
9 of months, the District Attorney’s Office has been criminally investigating allegations that a very  
10 significant number of these lawsuits (“AB 218 claims”) submitted against the County may be  
11 fraudulent. The investigation remains active and ongoing and encompasses potential misconduct by  
12 plaintiffs as well as third parties including but not limited to their attorneys, recruiters, and medical  
13 professionals.

14           Earlier this year, District Attorney Hochman requested that the County pause payment of  
15 these claims for six months while the District Attorney’s Office undertook a review of these claims  
16 to identify potential instances of fraud. The County agreed to do so.

17           Over the past months, the District Attorney’s Office has completed its preliminary phase of  
18 its investigation with respect to Group A claims. That phase has involved implementing a data  
19 collection system designed to capture information from multiple government databases as well as  
20 information from counsel for the County. Based on this preliminary investigation, the District  
21 Attorney’s Office believes the percentage of fraudulent claims involved in the related lawsuits  
22 seeking funds from the settlement may be as high as **81 percent**.

23           The District Attorney’s Office is now proceeding with the intermediate phase of its  
24 investigation, where the data collected will be further analyzed, compared, and interpreted. The  
25 District Attorney’s Office anticipates this deeper level of review will reveal additional fraudulent  
26 claims. It is currently prioritizing those claimants for whom the District Attorney’s Office has  
27 received a complete data set. The District Attorney’s Office has not received complete information  
28 for many claimants, particularly those who allege they were abused while under the supervision of

the Dependency Court.

2           The District Attorney's Office has advised Plaintiffs' lead counsel that attorneys wishing to  
3 expedite review of their clients' claims can do so by providing all court documentation, extrinsic  
4 documentation, and full identifying information for their clients which will expedite the  
5 intermediate phase of its investigation to identify which claimants were and were not housed at the  
6 location where they claim they were abused.

7           Based on the District Attorney's Office's review of the vetting done prior to the settlement  
8 for Group A, as well as the judicial vetting currently being conducted, District Attorney Hochman  
9 believes his office has resources to identify fraud not available to other agencies or entities. As  
10 such, the prior and ongoing vetting by other agencies and entities has been insufficient to determine  
11 whether the claims are fraudulent. Reliance on the results from those vettings that may have  
12 determined that certain claims were legitimate when, as a result of our further analysis, they actually  
13 were fraudulent, will result in the awards for legitimate victims being decreased in favor of paying  
14 fraudulent claims. In other words, since there is a finite amount of money available to settle all the  
15 claims, every fraudulent claim that receives a dollar (or more likely hundreds of thousands of  
16 dollars) means that legitimate claims from child abuse survivors will receive less of a payout – a  
17 completely unacceptable result.

18           In light of these findings thus far, District Attorney Hochman respectfully requests an  
19 additional temporary stay of the issuance and disbursement of settlement payments of six months  
20 until December 31, 2026, which should be sufficient time for the District Attorney's Office to  
21 complete its intermediate investigative review. Premature disbursement continues to pose a  
22 substantial risk of interfering with its investigation by complicating witness cooperation, obscuring  
23 financial trails, and impairing the office's ability to identify and prosecute fraudulent activity, as  
24 well as unjustly enriching those engaged in fraud at the expense of true victims.

25           An additional deferral of payment serves to protect the integrity of both the criminal  
26 investigation and the settlement process itself, while ensuring that funds ultimately reach rightful  
27 claimants.

28           This request is intended to expedite the identification and exclusion of fraudulent claims,

1 which is essential to preserving public confidence in the process and ensuring resources are directed  
2 to those who have genuinely suffered abuse.

3 Under California Code of Civil Procedure § 387(c) and (d)(2), a nonparty may petition the  
4 court for leave to intervene by ex parte application if the nonparty has an interest in the matter in  
5 litigation and the “disposition of the action may impair or impede that person’s ability to protect that  
6 interest, unless that [nonparty’s] interest is adequately represented by one or more of the existing  
7 parties.” Here, the District Attorney, a nonparty to this action, seeks to intervene in this matter as  
8 the District Attorney’s Office has an active and ongoing criminal investigation of the very lawsuits  
9 that are involved in the settlement of this case; no party has the ability to protect that investigation in  
10 the same manner the District Attorney’s Office can; and the payment and disbursement of settlement  
11 funds will impair and impede the District Attorney’s Office’s criminal investigation. As stated  
12 above, if settlement payments and disbursements are made at this time, this will complicate  
13 obtaining cooperation from witnesses to fraudulent activity, obscure financial trails as the funds  
14 disbursed to plaintiffs who filed fraudulent lawsuits will then have to be tracked through whichever  
15 financial channels the funds are sent, increase the time, effort, and complexity of having to clawback  
16 or recover funds fraudulently obtained, and unjustly enrich those engaged in fraud at the expense of  
17 true victims.

18 For the foregoing reasons, the District Attorney respectfully requests that the Court granting  
19 leave to intervene pursuant to California Code of Civil Procedure § 387 and stay for six months until  
20 December 31, 2026, the payment and disbursement of any settlement funds to any plaintiffs in any  
21 of the Camp Cases.

22  
23  
24 DATED: June 10, 2026

LOS ANGELES COUNTY DISTRICT ATTORNEY’S  
OFFICE

25 By: /s/ Nathan J. Hochman  
26 Nathan J. Hochman  
27 District Attorney  
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**DECLARATION OF NATHAN J. HOCHMAN**

I, Nathan J. Hochman, declare and state as follows:

1. I am an attorney at law duly licensed to practice before all courts of the State of California and am the District Attorney of Los Angeles County. I make this declaration in support of the **LOS ANGELES COUNTY DISTRICT ATTORNEY’S EX PARTE APPLICATION TO INTERVENE AND FOR A LIMITED STAY OF SETTLEMENT DISTRIBUTIONS**. The underlying lawsuits for which the intervention is sought concern the related lawsuits alleging sexual abuse at the Los Angeles County’s juvenile probation camps and halls (the “Camp Cases,” Lead Case No. 22STCV25961).

2. **EXHIBIT A** to this declaration represents a true and correct copy of the letter I sent dated May 21, 2026, to Andrew Baum, counsel for Los Angeles County, in the Camp Cases regarding my request for a stay of any settlement distributions for six months based on the reasoning and justifications provided in that letter.

3. On approximately Tuesday June 9, 2026, at approximately 5:51 pm, I emailed counsel of record in the Camp Cases to provide notice of the District Attorney’s intent to appear before the Court *ex parte* on Thursday, June 11, 2026 at 8:30 a.m.

4. My notice emails to counsel sought confirmation of whether plaintiffs would oppose, concur or take no position regarding the District Attorney’s Application. By 9:00 am June 10<sup>th</sup> 2026 I received the following responses: oppose the application (Abir Cohen Treyzon Salo LLP, Becker Law Group, Clarkson Law Firm P.C, D. Miller & Associates PLLC, McNicholas & McNicholas LLP, Peiffer Wolf Carr Kane Conway & Wise, Slater Slater Schulman LLP, The Lewis Farmer Law Group, and Waters Kraus Paul & Siegel), concur with application ( Aylstock, Witkin, Kreis,& Overholtz PLC, Bana Legal Group, Carillo Law Firm LLP, El Dabe Ritter Trial Lawyers, Engstrom, Lipscomb & Lack, Gould Grieco & Hensley, Jason J. Joy & Associates, Law Offices of Lee Paul HalladaManly, Stewart, Finaldi & Thom).

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2 5. Pursuant to Rule 3.1202(a), the Case Anywhere service list containing attorney  
3 information for the known counsel of record is attached as **EXHIBIT B**.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing  
5 is true and correct, and that this declaration was executed on June 10, 2026 in Los Angeles,  
6 California.

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9 DATED: June 10, 2026

LOS ANGELES COUNTY DISTRICT ATTORNEY

10 By: /s/ Nathan J. Hochman  
11 NATHAN J. HOCHMAN  
12 District Attorney

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 10250 Constellation Boulevard, 19th Floor, Los Angeles, California 90067.

On June 10, 2026, I served on the interested parties to this action a true copy of the document(s) entitled **LOS ANGELES COUNTY DISTRICT ATTORNEY’S EX PARTE APPLICATION TO INTERVENE AND FOR A LIMITED STAY OF SETTLEMENT DISTRIBUTIONS.**

Service was effectuated by forwarding the document(s) identified above in the following manner:

**(CASE ANYWHERE ELECTRONIC TRANSMISSION)** Pursuant to the Court’s Order Authorizing Electronic Service, the above-named document has been electronically served on counsel of record by transmission through the Case Anywhere system on the date below. The transmission of this document to Case Anywhere system was reported as complete and a copy of the Case Anywhere Transaction Receipt will be maintained along with the original document and proof of service in our office.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 10, 2026, at Los Angeles, California.

LOS ANGELES COUNTY DISTRICT ATTORNEY

By: /s/ Nathan J. Hochman  
NATHAN J. HOCHMAN  
District Attorney



NATHAN J. HOCHMAN  
LOS ANGELES COUNTY DISTRICT ATTORNEY

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HALL OF JUSTICE  
211 WEST TEMPLE STREET LOS ANGELES, CA 90012 (213) 974-3500

May 21, 2026

Andrew Baum, Esq.  
GLASER WEIL  
10250 Constellation Blvd., 19th Floor  
Los Angeles, California 90067-6219

Dear Mr. Baum:

As you are aware, the Los Angeles County District Attorney's Office is investigating allegations that a **very significant number of AB 218 claims** submitted against the County may be fraudulent. The investigation remains active and ongoing and encompasses potential misconduct by claimants as well as third parties including but not limited to attorneys, recruiters, and medical professionals.

At my request, the County previously agreed to pause payment of these claims for six months while my office undertook a review of these claims to identify potential instances of fraud.

We have completed the preliminary phase of our investigation with respect to Group A, which consisted of data collection, both from your office and utilizing a system we designed to capture information from multiple government databases. Based on this preliminary investigation, we believe the percentage of fraudulent claims may be as high as **81 percent**.

We are now proceeding with the intermediate phase of our investigation, where the data collected will be analyzed, compared, and interpreted. We anticipate this deeper level of review will reveal additional fraudulent claims. We are currently prioritizing those claimants for whom we have received a complete data set. As you are aware, we have not received complete information for many claimants, particularly those who allege they were abused while under the supervision of the Dependency Court.

We have advised Plaintiffs' lead counsel that attorneys wishing to expedite review of their clients' claims can do so by providing all court documentation, extrinsic documentation, and full identifying information for their clients. It is our hope this will expedite the intermediate phase of our investigation, and we will be able to identify which claimants were and were not housed at the location where they claim they were abused.

Based on our review of the vetting done prior to the settlement for Group A, as well as the judicial vetting currently being conducted, I believe my office has resources to identify fraud, which is not available to other agencies or entities. As such, the prior and ongoing vetting by other agencies

Andrw Baum, Esq.  
May 21, 2026  
Page Two

and entities has been insufficient to determine whether the claims are fraudulent. Reliance on the results from those vettings that may have determined that certain claims were legitimate when, as a result of our further analysis, they actually were fraudulent, will result in the awards for legitimate victims being decreased in favor of paying fraudulent claims. **In other words, since there is a finite amount of money available to settle all the claims, every fraudulent claim that receives a dollar (or more likely hundreds of thousands of dollars) means that legitimate claims from child abuse survivors will receive less of a payout.** That should be completely unacceptable to any decision-maker involved in resolving legitimate claims from child abuse survivors.

In light of these findings thus far, I respectfully request the County again temporarily defer the issuance of settlement payments until my office has completed our intermediate investigative review. Premature disbursement continues to pose a substantial risk of interfering with my investigation by complicating witness cooperation, obscuring financial trails, and impairing my office's ability to identify and prosecute fraudulent activity, as well as unjustly enriching those engaged in fraud at the expense of true victims.

An additional deferral of payment serves to protect the integrity of both the criminal investigation and the settlement process itself, while ensuring that funds ultimately reach rightful claimants.

This request is intended to expedite the identification and exclusion of fraudulent claims, which is essential to preserving public confidence in the process and ensuring resources are directed to those who have genuinely suffered abuse.

Please confirm the County will agree to defer its initial payment for an **additional period of at least six months.**

Respectfully,

A handwritten signature in blue ink, appearing to read "Nathan J. Hochman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nathan J. Hochman  
District Attorney

**EXHIBIT B**  
ELECTRONIC SERVICE LIST

Case Name: **LAC Camp Cases - Lead Case 22STCV25961**

Case Information: **22STCV25961 and Related Cases, Los Angeles Superior Court**

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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the County of Los Angeles, State of California; I am over the age of 18  
4 and not a party to the within action; my business address is 211 W. Temple Street, Suite 1200, Los  
5 Angeles, CA 90012.

6 On June 10, 2026, I served the foregoing document(s) described as **LOS ANGELES COUNTY  
7 DISTRICT ATTORNEY'S EX PARTE APPLICATION TO INTERVENE AND FOR A LIMITED  
8 STAY OF SETTLEMENT DISTRIBUTIONS**

9 on the interested parties to this action by delivering thereof in a sealed envelope addressed  
10 to each of said interested parties at the following address(es):

11 **SEE ATTACHED LIST**

12  **(BY MAIL)** I am readily familiar with the business practice for collection and processing of  
13 correspondence for mailing with the United States Postal Service. This correspondence shall  
14 be deposited with the United States Postal Service this same day in the ordinary course of  
15 business at our Firm's office address in Los Angeles, California. Service made pursuant to  
16 this paragraph, upon motion of a party served, shall be presumed invalid if the postal  
17 cancellation date of postage meter date on the envelope is more than one day after the date of  
18 deposit for mailing contained in this affidavit.

19  **(BY ELECTRONIC SERVICE)** by causing the foregoing document(s) to be electronically  
20 filed using the Court's Electronic Filing System which constitutes service of the filed  
21 document(s) on the individual(s) listed on the attached mailing list.

22 X **(BY E-MAIL SERVICE)** I caused such document to be delivered electronically via e-mail  
23 to the e-mail address of the addressee(s) set forth in the attached service list.

24  **(BY OVERNIGHT DELIVERY)** I served the foregoing document by FedEx, an express  
25 service carrier which provides overnight delivery, as follows: I placed true copies of the  
26 foregoing document in sealed envelopes or packages designated by the express service  
27 carrier, addressed to each interested party as set forth above, with fees for overnight delivery  
28 paid or provided for.

**(BY FACSIMILE)** I caused the above-referenced document to be transmitted to the  
interested parties via facsimile transmission to the fax number(s) as stated on the attached  
service list.

**(BY PERSONAL SERVICE)** I caused such envelope to be delivered by hand to the offices  
of the above named addressee(s).

X (State) I declare under penalty of perjury under the laws of the State of California that  
the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at  
Executed on June 10, 2026, at Los Angeles, California.

25 /s/Sodabh Sahab  
26 Sodabh Sahab

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See Exhibit B