
***APPROVED* MINUTES OF MEETING
CALIFORNIA LAW REVISION COMMISSION**

March 20, 2026

A meeting of the California Law Revision Commission was held in Sacramento and via teleconference on March 20, 2026.

ATTENDANCE

Commission

Present Richard Simpson, Chair
Maria Bee
David A. Carrillo
Ana Cubas
Senator Eloise Gómez Reyes
Cara Jenkins, Legislative Counsel

Absent Victor King, Vice-Chair
Amb. (r.) David Huebner
Assembly member Blanca Pacheco

Commission Staff

Sharon Reilly, Executive Director
Sarah Huchel, Chief Deputy Director
Steve Cohen, Staff Counsel
Christie House, Chief Administrative Officer
Megan Hayenga, Office Technician
Yanan Yan, Student Extern

Antitrust Expert

Cheryl Johnson, Consultant to the Commission

Other Attendees¹

| | |
|--------------------|------------------------|
| Alejandra Alvarado | Eric Enson |
| Jess B | Daniela Fernandez-Ulen |
| Mykala Ballard | Kathleen Foote |
| Bianca Blomquist | Zachary Freed |
| Carmen Comsti | Ben Golombek |
| Andrew Dadasovich | Barbara Goodrich-Welk |
| David DeRuiter | Connor Gusman |

¹ Members of the public are only identified in the Minutes as attendees if they expressly consented to being identified when registering to attend via teleconference, by completing the voluntary visitor register at an in-person meeting location, or by identifying themselves during public comment.

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|------------------------|-------------------------|
| Matthew Hamlett | Leah Newkirk |
| Lee Hepner | Ben O'Brien |
| Robert Herrell | Teri Olle |
| Brock Hrehor | Justin Paddock |
| Nikki Johnson | Kaitlyn Preston |
| Tasia Kieffer | Yarissa Ramirez |
| Stephanie Kimball | Professor Robin Feldman |
| Ron Knox | Kedharnath Sankararaman |
| Ilana Kowarski | Bilal Sayyed |
| Jennifer Kurrie | Sophia |
| Gilbert Lara | Teja Stephens |
| Peter Leroy-Muñoz | Rhonda Stevenson |
| Gretchen Lichtenberger | Carlia Suba |
| Carl London | Jadene Tamura |
| Mari Lopez | Loyal Terry |
| Yarelíe Magallon | Abigail Wilson |
| Mona Masri | |

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APPROVAL OF ACTIONS TAKEN

Unless otherwise indicated, the Commission decisions noted in these Minutes were approved by all members present at the meeting. If a member who was present at the meeting voted against a particular decision, abstained from voting, or was not present when the decision was made, that fact is noted below.

CLOSED SESSION

The Commission met in closed session to discuss a personnel matter pursuant to Government Code Section 11126. No Commission decisions were required or made.

MINUTES

The Commission considered Memorandum [2026-11](#), presenting draft Minutes of the January 20, 2026, meeting. The Commission approved the Minutes without change.

(Senator Reyes abstained)

ADMINISTRATIVE MATTERS

Report of the Executive Director

The Executive Director reported on the following matters:

- Budget update
- Office Space
- Website Contract
- Hiring status

Commissioner Suggestions

There were no suggestions made by Commissioners.

2026 Legislative Program

The Commission considered Memorandum [2026-12](#), presenting an update on pending legislation to implement Commission recommendations and the status of the Commission's Biennial Resolution of Authority. No Commission decisions were required or made.

The Commission also considered the [First Supplement](#) to Memorandum 2026-12 which presented the technical revisions made by the Office of Legislative Counsel to the Final Recommendation for Study B-750, Antitrust: Single Firm Conduct. The Commission approved including the revisions in the Preprint version of the Final Recommendation.

STUDY E-200 — RECODIFICATION OF TOXIC SUBSTANCE STATUTES

The Commission considered Memorandum [2026-13](#), presenting a staff draft of proposed recodified provisions of Chapter 6.5 relating to facility and generator fees for provisional inclusion in a tentative recommendation in this study.

The Commission provisionally approved the proposed revisions with direction to the staff to delete references to past operative dates.

STUDY I-200 — TERMINOLOGY RELATING TO PERSONS WITH DISABILITIES

The Commission considered Memorandum [2026-9](#) and directed staff to explore replacing the defined and undefined terms “dependent adult/person” with “adult/person with a disability.”

STUDY B-750 — ANTITRUST LAW

The Commission considered Memorandum [2026-14](#) presenting draft language for Mergers and Acquisitions as requested by the Commission at its prior meeting, and the [First](#), [Second](#), and [Third](#) Supplements thereto presenting public comments.

The Commission directed the staff to present additional options clarifying “may” within the phrase “may be substantially to lessen competition,” which establishes the threshold for a prima facie case under *Philadelphia National Bank*.

The Commission requested the staff summarize different philosophies on the potential standards for discouraging mergers relative to current federal Clayton Act interpretations and present language specifying those standards.

The Commission further agreed the options should:

- Set a low standard for the plaintiff’s initial burden of proof.
- Clarify the federal standard.
- Include the citation for *Philadelphia National Bank* in any language based the case.
- Not directly refer to Merger Guideline 1 from the 2023 Federal Merger Guidelines, but that the test should be considered persuasive authority.
- Include the Single Firm Conduct purpose statement² as a separate section.

(Senator Reyes was not present for this discussion and Commissioner Cubas and Jenkins were present for the staff presentation of the memorandum but not the Commission’s direction to the staff)

STUDY J-507 — CIVIL DISCOVERY IMPROVEMENTS

The Commission considered Memorandum [2026-15](#) which reactivated a portion of Study J-507 relating to informal discovery conferences. The Commission agreed with the

² [First Supplement](#) to Memorandum 2026-12, p. 2.

staff's proposed next steps for the study. Commissioner Bee suggested additional outreach to the American Board of Trial Advocates.

(Senator Reyes was not present for this discussion)
