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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13
14 **ERICA JIMENEZ, individually and**
15 **on behalf of a class of similarly**
16 **situated individuals,**

17 Plaintiff,

18 v.

19 **DR. ERICA PAN, in her official**
capacity as Director of the California
Department of Public Health; DR.
20 **BARBARA FERRER, in her official**
capacity as Director of the Los
21 **Angeles County Department of Public**
Health; MANUEL CARMONA, in his
22 **official capacity as the Director of**
Public Health for the Pasadena Public
23 **Health Department; LOS ANGELES**
COUNTY DEPARTMENT OF
24 **PUBLIC HEALTH; and PASADENA**
PUBLIC HEALTH DEPARTMENT,

25 Defendants.
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2:26-cv-03500-SPG-SP

**NOTICE OF ERRATA TO
OPPOSITION TO PLAINTIFF'S
MOTION FOR PRELIMINARY
INJUNCTION BY DEFENDANT
DIRECTOR OF THE
CALIFORNIA DEPARTMENT OF
PUBLIC HEALTH ERICA PAN**

Date: May 27, 2026
Time: 1:30 p.m._
Courtroom: 5C
Judge: The Honorable Sherilyn
Peace Garnett

Trial Date:

Action Filed: 4/02/2026

1 Defendant Dr. Erica Pan, in her official capacity as Director of the Department
2 of Public Health, files this Notice of Errata to correct a number of non-substantive
3 errors in Defendant's opposition brief filed on May 6, 2026, as follows:

4 1. At p. 24, lines 14-15, the opposition included the following clause that
5 was cut off and thus incomplete: "...namely, in this case, Black women who are
6 dying at disproportionately high rates due to pregnancy and Black infants, ..." That
7 clause is corrected to read, "...namely, in this case, Black women and infants who
8 are dying at disproportionately high rates due to adverse pregnancy and birth
9 outcomes."

10 2. Minor citation errors throughout, including period placement and word
11 spacing;

12 3. Minor stylistic oversights for clarity; and

13 4. The absence at the end of the brief of a Certificate of Compliance, as
14 required by Local Rule 11-6.2. That certificate is now included.

15 Defendant is concurrently filing a Corrected Opposition that corrects these
16 non-substantive errors and oversights, and makes no other changes.

1 Dated: May 7, 2026

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 JENNIFER A. BUNSHOFT
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10 */s/ Jennifer G. Perkell*
11 JENNIFER G. PERKELL
12 Supervising Deputy Attorney General
13 *Attorneys for Attorneys for Defendant*
14 *Dr. Erica Pan, in her official capacity*
15 *as Director of the California*
16 *Department of Public Health*

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CERTIFICATE OF SERVICE

Case Name: **Erica Jimenez v Dr. Erica Pan,
et al.** No. **2:26-cv-03500-SPG-SP**

I hereby certify that on May 7, 2026, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**NOTICE OF ERRATA TO OPPOSITION TO PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION BY DEFENDANT DIRECTOR OF THE CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH ERICA PAN**

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 May 7, 2026, at Concord, California.

C. Murphy
Declarant

C. Murphy
Signature

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