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Attorneys for Defendants

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
UNLIMITED JURISDICTION

SERVICES, IMMIGRANT RIGHTS &
EDUCATION NETWORK, et al.,

Plaintiffs,

v.

CITY OF SAN JOSE, et al.

Defendants.

Case Number: 25CV480254

**REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF DEFENDANTS'
DEMURRER TO COMPLAINT**

Date: August 6, 2026

Time: 9:00 AM

Dept. 10

Judge Hon. Jeffrey El-Hajj

Defendants respectfully request that the Court take judicial notice of the following facts pursuant to Evidence Code section 451, 452 and 453:

1. The following modes of transportation are available to a person wishing to travel within the City of San José: carpooling, borrowing a vehicle, Waymo, Uber, Lyft, taxi, Zipcar, Caltrain, VTA buses and light rail, an urban bicycle trail network, pedicabs, e-scooters, e-bikes, or renting a car. *See* Visit San José, “Getting to and From San Jose”, <https://www.sanjose.org/transportation>
2. Use of cameras to record vehicles in public places is commonplace in the City of San José. (i.e., dashcams, Tesla’s Sentry Mode, Google’s Street View vehicles, Ring cameras, outdoor

1 Nest cameras, surveillance cameras in retail parking lots, ALPRs in parking garages at local
2 malls, individuals' cell phone cameras)

3 3. The City of San José operates approximately 1,900 miles of streets within its borders. *See*
4 City of San José, Enterprise GIS, Streets, <https://data.sanjoseca.gov/dataset/>

5 4. The City of San José contains over 900 traffic signalized intersections. *See* City of San José,
6 Enterprise GIS, Street Intersections, <https://data.sanjoseca.gov/dataset/street-intersections>

7 5. The City of San José contains over 5,000 stop-signed intersections. *See* City of San José,
8 Enterprise GIS, Street Intersections, <https://data.sanjoseca.gov/dataset/street-intersections>

9 A court must take judicial notice of facts and propositions of generalized knowledge that are so
10 universally known that they cannot reasonably be the subject of dispute. Evid. Code § 451(f).

11 Additionally, if a party requests a trial court to take judicial notice, furnishes the court with sufficient
12 information to enable it to take judicial notice of a matter, and each adverse party is given sufficient
13 notice of the request, then the trial court shall take judicial notice of any matter specified in Evidence
14 Code Section 452. Evid. Code § 453. This includes the following: facts and propositions that are of such
15 common knowledge within the territorial jurisdiction of the court that they cannot reasonably be the
16 subject of dispute; and facts and propositions that are not reasonably subject to dispute and are capable
17 of immediate and accurate determination by resort to sources of reasonably indisputable accuracy. Evid.
18 Code § 452(g), and (h).

19 Defendants request that the Court take judicial notice of Fact 1 above pursuant to Evidence Code
20 Sections 451, 452 and/or 453. Defendants request that the Court take judicial notice of Facts 2-5 above
21 pursuant to Evidence Code Sections 452 and 453.

22 Respectfully submitted,

23 Dated: January 16, 2026

SUSANA ALCALA WOOD, City Attorney

25 By: 

JULIA VAN ROO
Sr. Deputy City Attorney

27 Attorneys for Defendants