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November 25, 2019

REQUEST TO DEPUBLISH OPINION
CALIFORNIA RULES OF COURT, RULE 8.1125

The Honorable Chief Justice Tani Cantil-Sakauye
And Associate Justices
Supreme Court of California
350 McAllister Street
San Francisco, California 94102-4797

Re: *Fernandez v. Jimenez* (2019) 40 Cal.App.5th 482
Second Appellate Dist., Division Three, No. B281518
Petition for Review Currently Pending, No. S258928

Dear Chief Justice Cantil-Sakauye and Associate Justices:

We write on behalf of the Association of Southern California Defense Counsel (ASCDC) to request that the opinion in *Fernandez v. Jimenez* (2019) 40 Cal.App.5th 482 (*Fernandez*) be depublished from the official California Appellate Reports pursuant to California Rules of Court, rule 8.1125.

Interest of the Requesting Organization

ASCDC is an association of over 1,100 leading attorneys who specialize in defending civil actions in Southern and Central California. ASCDC is actively involved in assisting courts on issues of interest to its members. ASCDC affords professional education, fellowship and advancement for its members. It acts as a liaison between the defense bar, the courts and the Legislature. It is actively involved in matters of interest to the judiciary and bar. It has appeared as amicus curiae in numerous cases before this Court and Courts of Appeal across the state.

ASCDC's members frequently defend against the type of case that *Fernandez* exemplifies—a personal-injury lawsuit where plaintiff's counsel asks the jury to award a huge amount as noneconomic damages. Its members are deeply concerned about a psychological bias known as "anchoring" (discussed below) that subconsciously causes jurors to award higher amounts of noneconomic damages than they otherwise knowingly would award simply because the plaintiff's attorney proposes an astronomical sum as the starting point.

ASCDC's members are seeing a disturbing trend of opposing counsel using anchoring bias to try to inflate noneconomic damages awards. In cases that not long ago would have prompted most plaintiffs' attorneys to propose noneconomic damage awards of $500,000 to a few million dollars, attorneys are now proposing staggeringly high numbers—$10 million, $20 million, $30 million. And in cases involving substantial injury (such as *Fernandez*, which involves children losing a mother), many plaintiffs' attorneys are now proposing stratospheric numbers—$50 million, $75 million, numbers north of $150 million (e.g., *Fernandez*, where counsel proposed $200 million). Attorneys do not propose such huge numbers because they actually expect an award in that amount. They do it because anchoring bias will yield a much higher number than if they proposed a more realistic number at the outset. This anchoring trend is a new, and rapidly proliferating, phenomenon. Noneconomic damage verdicts are exploding.

As explained below, ASCDC seeks depublication of *Fernandez* out of concern that certain language in the opinion will create confusion and will be twisted out of context in ways that will impede the ability of courts and defense attorneys to combat anchoring bias. Because, as we explain below, some of the problematic language in *Fernandez* was not even necessary to the decision, ASCDC suspects that the opinion—if it remains published—will be applied in ways the Court of Appeal never intended.

Depublication does not depend on what this Court may think about the *Fernandez* verdict itself. Instead, depublication is necessary because the opinion, if it remains published, will detrimentally impact the ability of courts and defense attorneys to counter anchoring bias in all sorts of cases.

The Anchoring Problem

Anchoring is a cognitive bias that causes an individual (such as a juror) to depend too heavily on proposed numbers (such as noneconomic damage numbers proposed by a plaintiff's attorney) when making decisions, even when the individual knows or believes that the proposed number is too high.

The prejudicial impact of anchoring is not theoretical—it is both well-documented and scientifically proven. "Numerous studies establish that the jury's damages decision is strongly affected by the number suggested by the plaintiff's attorney, *independent of the strength of the actual evidence* (a psychological effect known as 'anchoring')." (Campbell, et al. *Countering the Plaintiff's Anchor: Jury Simulations to Evaluate Damages Arguments* (2016) 101 Iowa L.Rev. 543, 545, italics added; see Chapman & Bornstein, *The More You Ask for, the More You Get: Anchoring in Personal Injury Verdicts* (1996) 10 Applied Cognitive Psychol. 519, 522, 534 [summarizing "studies demonstrat(ing) that juror decision making is influenced by monetary anchors" and finding that "anchoring effects *represent biases rather than the use of relevant information*," italics added].)

"When asked to make a judgment, decision makers take an initial starting value (i.e., the anchor) and then adjust up or down. Studies underscore the significance of that initial anchor; *judgments tend to be strongly biased in its direction.*" (*United States v. Rojas* (D.Conn., Dec. 13, 2010) 2010 WL 5253203, at p. *4, italics added, quoting Gertner, *Thoughts on Reasonableness* (2007) 19 Fed. Sent'g Rep. 165, 167-168.) Research demonstrates the risk "that jurors will become anchored to the monetary sums suggested by plaintiffs' counsel in arguing for an award of non-economic damages, *no matter how irrelevant or outrageous the suggested sum may seem.*" (Rushing et. al., *Anchors Away: Attacking Dollar Suggestions for Non-Economic Damages in Closings. Defense Counsel Should Use a Motion in Limine to Preclude Plaintiffs' Attorneys from Using Lump Sum or Per Diem Computations to Jurors* (2003) 70 Def. Couns. J. 378, 380-381, italics added.)

For example, "[i]n one study, a request for $500,000 produced a median mock jury award of $300,000, whereas a request of $100,000, in the identical case, produced a median award of $90,000." (Sunstein, *Hazardous Heuristics* (2002) U. Chicago Public Law & Legal Theory Working Paper No. 33, p. 39 [hereafter Sunstein], internal citations omitted https://chicagounbound.uchicago.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1137&context=public_law_and_leg

al_theory [as of November 25, 2019]; see also Malouff et al., *Shaping Juror Attitudes: Effects Of Requesting Different Damage Amounts In Personal Injury Trials* (1989) 129 J. Soc. Psychol. 491.) Thus, even though the mock jurors were presented with the same facts, same claims and same arguments, they tended to award a *much* larger number when the attorney proposed a much larger number, even though they tended to discount a higher percentage off the starting number when it was larger.

"'[D]ebiasing' is very difficult in this context." (Sunstein, *supra*, at p. 9.) Studies show that "for an anchor to have an effect, people need not be aware of its influence; that an anchor is operating even when people think that it is not; that anchors have effects even when people believe, and say they believe, that the anchor is uninformative; and that making people aware of an anchor's effect does not reduce anchoring." (*Ibid.*, internal citations omitted; see also Stein & Drouin, *Cognitive Bias in the Courtroom: Combatting the Anchoring Effect Through Tactical Debiasing* (2018) 52 U.S.F. L.Rev. 393, 398, 404 ["Research has shown anchoring has a strong effect on civil court jury awards"; people "genuinely do not see themselves as biased . . . (and) are unwilling or unable to recognize their bias, even when told . . . ."].) For example, even though the jurors in the above-mentioned study perceived the $500,000 number as high, and chose a substantial discount, they still came in much higher than when the attorney proposed a lower number.

Anchoring bias is a huge problem when it comes to non-economic damages, because there is no real standard for such damages. California jurors are instructed: "*No fixed standard exists* for deciding the amount of these noneconomic damages. You must use your judgment to decide *a reasonable amount* based on the evidence and *your common sense*." (2 Judicial Council of California Civil Jury Instructions (2019 ed.) No. 3905A, p. 1213, italics added.)

As a result, jurors deciding non-economic damages have virtually nothing to rely on other than the number proposed by counsel. With *economic* damages, jurors can rely on experts, or financial, medical or employment records, or accounting data. None of that is true with noneconomic damages. (*Beagle v. Vasold* (1966) 65 Cal.2d 166, 172 (*Beagle*) ["no witness may express his subjective opinion on the matter"].) The jurors are provided a huge number from plaintiff's counsel, and basically told to use their common sense and figure it out.

It therefore follows that an attorney who proposes $200 million in noneconomic damages in a severe injury case has very little to lose, even though the attorney never expects to get that amount and knows such an award would likely trigger a remittitur on new trial motion or appellate review. That's because the true goal is to set a high anchor, knowing that anchoring bias will unknowingly lead the jurors to a much larger number than if a more realistic number was proposed in the first place. Even in cases involving no death, no permanent injury, and no physical injury, some juries have recently awarded verdicts in the $10-$20 million range where the plaintiffs' attorney requested 2-3 times that amount. Anchoring bias is real.

And when it comes to noneconomic damages, the need for courts and defense attorneys to be able to counter that bias is crucial.

Why Depublication Is Necessary

Fernandez will exacerbate the anchoring problem that defense attorneys are encountering today in noneconomic damages cases. The opinion, if it remains published, will create confusion and be twisted out of context in ways that will impede the ability of courts and defense attorneys to counter anchoring bias.

The anchoring issue in *Fernandez* arose in the context of plaintiff's counsel preconditioning jurors during voir dire by saying he planned to ask for hundreds of millions of dollars in damages. (See 40 Cal.App.5th at pp. 493-494.) Anchoring bias is most effective from a plaintiff's standpoint when huge numbers are mentioned to jurors as early as possible. It is therefore no accident when plaintiffs' attorneys seek to mention huge dollar amounts during voir dire.

In *Fernandez*, plaintiff's counsel asked at trial for $200 million in noneconomic damages ($50 million per child). (40 Cal.App.5th at p. 493.) The Court of Appeal examined whether plaintiff's counsel committed misconduct by preconditioning the jurors during voir dire by asking "if they would be okay awarding $200 million dollars." (*Ibid.*) The Court of Appeal concluded that there was no attorney misconduct because the $200 million figure was introduced *by a juror* during voir dire, not by plaintiff's counsel. (*Ibid.*) It also emphasized that when the juror mentioned that figure, the trial court "pointed out that 'we don't know the amount'" and "then framed the question: 'Could you award substantial damages' if the facts called for it?" (*Ibid.*) In addition, although the trial court

initially allowed plaintiff's counsel to mention he would be seeking "hundreds of millions of dollars," the court sustained defense counsel's objection when the statement was made a second time, and "repeated that 'we're not getting into that'" when counsel mentioned it yet another time. (*Ibid.*)

The Court of Appeal also concluded that "even if informing prospective jurors that plaintiffs were seeking hundreds of millions of dollars . . . *was error*, it was not prejudicial" given the entirety of evidence in the case. (40 Cal.App.5th at p. 494, italics added.)

These are fact-specific and case-specific findings, not broad guidance worthy of publication. ASCDC submits that, because of anchoring bias, the attorney should have been prevented from mentioning "hundreds of millions of dollars" in the first place and that it is doubtful the court's subsequent admonitions cured the impact. (*Fernandez, supra,* 40 Cal.App.5th at p. 493.) But the trial court, to its credit, did correctly tell prospective jurors that the issue is simply whether they could award "'substantial damages." (*Ibid.*) The problem is that the opinion goes beyond just saying there was no attorney misconduct because a juror introduced the $200 million figure or that any error was harmless. The opinion also states, immediately after emphasizing that a juror (not plaintiff's counsel) introduced the $200 million number,

> "In any event, this was not improper preconditioning. Jurors may be informed of the damages a plaintiff seeks. (*Beagle v. Vasold* (1966) 65 Cal.2d 166, 170-171, 53 Cal.Rptr. 129, 417 P.2d 673; Wegner et al, Cal. Practice Guide: Civil Trials and Evidence (The Rutter Group 2018) ¶¶ 5:311, 5:312, p. 5-74.)

(*Fernandez*, at p. 494.) If the opinion remains published, this unnecessary "in any event" comment will trigger rampant confusion and impede efforts to combat anchoring bias.

The reference to "*this* was not improper" is also vague. Was the Court of Appeal saying the juror's mentioning of the $200 million number was not improper preconditioning? Was it saying that mentioning that number would not have been improper had counsel done so instead of the juror? Did it mean that what transpired during this particular voir dire (given the trial court's sustaining of some objections and providing some jury admonitions) was not improper

preconditioning? Was it saying that the mention of *any* specific number is *never* a problem in voir dire?

To the extent the Court of Appeal was indicating that there is never any anchoring or pre-conditioning problem with mentioning huge numbers in voir dire, which undoubtedly is how plaintiffs' attorneys will try to pitch the "in any event" language, the authority *Fernandez* cites does *not* support that proposition.

Yes, *Beagle* lets plaintiffs' attorneys propose noneconomic damage numbers to the jury. But the fact that "[j]urors may be informed of the damages a plaintiff seeks"—the proposition for which *Fernandez* cites *Beagle*—has nothing to do with whether mentioning large numbers during voir dire is "improper preconditioning." *Beagle* only upheld the right of attorneys to propose noneconomic damage numbers to jurors *during closing argument*; it repeatedly recognizes that any attorney proposal is merely *argument*, not evidence. (See *Beagle*, *supra*, 65 Cal.2d at pp. 176-177, 180-183.) *Beagle* did not intimate, let alone hold, that plaintiffs' attorneys can properly mention their noneconomic damages argument during voir dire or at any other period preceding closing argument. In fact, this Court recognized that "no witness may express his subjective opinion on the matter." (*Id.* at. p. 172.) Attorney argument should be confined to where it belongs—in closing argument. *Beagle* certainly does not stand for the proposition that plaintiffs' attorneys should be allowed to take advantage of anchoring bias by proposing in voir dire or at closing argument numbers (such as $200 million) that are excessive as a matter of law and that the attorneys know are likely to trigger a new trial remittitur or appellate reversal if actually awarded.

Beagle also recognized that, given the risks in letting plaintiffs' attorneys propose noneconomic damage numbers to the jury, there must be "meaningful safeguards to prevent the jury from being misled" and trial courts *must* exercise their "control over the scope of counsel's argument . . . to protect the integrity of the jury's decision-making role." (65 Cal.2d at pp. 180, 182.) One of the key safeguards preventing jurors from being swayed by anchoring bias is the discretion of trial courts to prohibit attorneys from mentioning huge numbers during voir dire or early in the case. Absent depublication, plaintiffs will use *Fernandez* to try to water down that discretion by misleadingly claiming *Fernandez* holds there is no problem with mentioning large damage amounts during voir dire.

Other than *Beagle*, the only authority *Fernandez* cites for its vague "not improper preconditioning" comment is a Rutter Group treatise. (40 Cal.App.5th at p. 494.) At the paragraphs cited by *Fernandez*, that treatise states—citing no authority—that counsel "are usually permitted to question prospective jurors as to their ability to return a large verdict," and uses a $1 million verdict as an example. (See Wegner et al, Cal. Practice Guide: Civil Trials and Evidence, *supra*, at ¶¶ 5:311, 5:312, p. 5-74.) There is a fundamentally different anchoring problem between asking jurors about a "large" verdict or a $1 million verdict, versus asking them if they can award $25 million, $50 million, $100 million or, as in *Fernandez*, $200 million. *Fernandez* also fails to recognize that the very same treatise warns elsewhere that "[b]y putting a monetary number on the case at the voir dire stage, the jury *may get 'anchored' or warmed up* to considering a large number early on in the trial*, to plaintiffs' benefit*," and that some judges therefore choose to prohibit attorneys from mentioning numbers during voir dire. (*Id.* at ¶ 5:286, p. 5-69, italics added.)

The *Fernandez* trial court got it right when it told the jury that the proper voir dire question is "'Could you award substantial damages' if the facts called for it?" (*Fernandez*, *supra*, 40 Cal.App.5th at p. 493.) That question, rather than letting attorneys float huge specific dollar numbers, is a well-accepted exercise of discretion to balance the need to probe bias during voir dire with the need to prevent attorneys from anchoring jurors with huge numbers early in the case.[1]

[1] See, e.g., *Trautman v. New Rockford-Fessenden Co-op Transport Assn.* (N.D. 1970) 181 N.W.2d 754, 759 (upholding trial court's discretion to deny questions to prospective jurors about the possible dollar amount of a verdict "as they may tend to influence the jury as to the size of the verdict" and create a predisposition to a high verdict); *Henthorn v. Long* (W.Va. 1961) 122 S.E.2d 186, 196 (upholding trial court's discretion to deny voir dire questioning about possible damage amounts because the technique is "sometimes advocated as a means of inducing juries to return big verdicts"); *Paradossi v. Reinauer Bros. Oil Co.* (N.J.Super.Ct.App.Div. 1958) 146 A.2d 515, 519-521 (question about potential verdict of $40,000 did not elicit information pertinent to jurors' qualifications, impartiality, or lack of bias); *Haydel v. Hercules Transport Inc.* (La.Ct.App. 1995) 654 So.2d 418, 426 (trial court did not abuse discretion in sustaining objection to plaintiff's counsel discussing specific dollar amounts during voir dire; letting counsel inquire whether prospective jurors could award a "substantial" verdict sufficed to uncover potential prejudice); *Dehn v. Otter Tail Power Co.* (N.D. 1977) 251 N.W.2d 404, 415 (trial

Fernandez addressed whether the specific voir dire conduct in that case rose to the level of attorney misconduct and whether any error was prejudicial. But that's not the depublication question. The depublication question is whether the opinion, if it remains published, will cause confusion and potentially impede the ability of courts and defendants to combat anchoring bias during voir dire and beyond. It will. Only depublication can eliminate the confusion and threat to the integrity of the jury decision-making process that will arise if *Fernandez* remains on the books.

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court properly sustained objections to plaintiff's counsel asking about specific dollar amounts but had discretion to let counsel inquire whether prospective jurors could award "large damages," a "big large, big amount of money," or an award "large in dollars"); *Kern v. Uregas Service of West Frankfort, Inc.* (Ill.Ct.App. 1980) 412 N.E.2d 1037, 1052 (trial court "did not abuse its discretion in limiting plaintiffs' [voir dire] inquiries on specific sums of money" but allowing "inquiring of jurors, in a less particularized fashion, whether they had any prejudice against large verdicts"); *Juarez v. Commonwealth Medical Associates* (Ill.Ct.App. 2000) 742 N.E.2d 386, 392 (trial court properly exercised discretion in limiting plaintiff's counsel to inquiring whether potential jurors "could award 'substantial damages'"); *Jones v. Parrott* (Ga.Ct.App. 1965) 143 S.E.2d 393, 395 (voir dire questions to prospective jurors about verdict size "should be phrased in general terms," not in specific dollar amounts).

Conclusion

Cases should be decided on their facts, not because of a psychological bias that subconsciously impacts jurors. If *Fernandez* remains published, its vague "in any event" comment will be used by plaintiffs' attorneys to try to undermine the ability of courts and defendants to combat anchoring bias, detrimentally impacting the fairness of the judicial system. Jurors should be deciding cases based upon the law and the evidence, *not* upon tactics that unfairly skew their decision making process. For these reasons, the Court of Appeal's opinion should be ordered not published in the Official Reports.

Respectfully submitted,
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By: /s/ Edward L. Xanders
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/s/ Chris Hsu

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11-25-2019

Date

/s/Chris Hsu

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