

**FILED**

Superior Court of California  
County of San Francisco

FEB 03 2026

CLERK OF THE COURT

BY: Jean Bertelsen  
Deputy Clerk

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN FRANCISCO

DEPARTMENT 606

COORDINATION PROCEEDING  
SPECIAL TITLE [RULE 3.550]

JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 5431

**CHATGPT PRODUCT LIABILITY  
CASES**

**ORDER RE: PETITION FOR  
COORDINATION**

Included actions:

*Fox v. OpenAI, Inc., et al.*, Superior Court of  
California, County of Los Angeles, Case No.  
25STCV32379

*Shamblin v. OpenAI, Inc., et al.*, Superior  
Court of California, County of Los Angeles,  
Case No. 25STCV32382

*Madden v. OpenAI, Inc., et al.*, Superior Court  
of California, County of Los Angeles, Case  
No. 25STCV32383

*Brooks v. OpenAI, Inc., et al.*, Superior Court  
of California, County of Los Angeles, Case  
No. 25STCV32386

*Lacey v. OpenAI, Inc., et al.*, Superior Court of  
California, County of San Francisco, Case No.  
CGC-25-630808

1 *Enneking v. OpenAI, Inc., et al.*, Superior  
2 Court of California, County of San Francisco,  
Case No. CGC-25-630809

3 *Irwin v. OpenAI, Inc., et al.*, Superior Court of  
4 California, County of San Francisco, Case No.  
CGC-25-630811

5 *Raine v. OpenAI, Inc., et al.*, Superior Court of  
6 California, County of San Francisco, Case No.  
CGC-25-628528

7 *First County Bank v. OpenAI, Inc., et al.*,  
8 Superior Court of California, County of San  
9 Francisco, Case No. CGC-25-631477

10 *DeCruise v. OpenAI, Inc., et al.*, Superior  
11 Court of California, County of San Diego  
*et al.*, Case No. 26CU003118C

12 *Jacquez v. OpenAI, Inc., et al.*, Superior Court  
13 of California, County of Alameda, Case No.  
26CV165635

14 *Gray v. OpenAI, Inc., et al.*, Superior Court of  
15 California, County of Los Angeles, Case No.  
16 26STCV00988

17 The hearing on Petition for Coordination came on regularly for hearing on January 30, 2026  
18 before the Hon. Stephen M. Murphy in the above-entitled court. Petitioners Jennifer Fox, individually and  
19 as successor-in-interest to Decedent Joseph Martin Ceccanti; Christopher Shamblin and Alicia Shamblin,  
20 individually and as successors-in-interest to decedent Zane Shamblin; Hannah Madden; Allen Brooks;  
21 Cedric Lacey, individually and as successor-in-interest to Decedent Amaurie Lacey; Karen Enneking,  
22 individually and as successor-in-interest to Decedent Joshua Enneking; and Jacob Lee Irwin (collectively,  
23 “Petitioners”), moved for coordination of eight cases filed in various California state superior courts.  
24 Notice of several potential “add-on” cases were received prior to the hearing<sup>1</sup>. Defendants OpenAI, Inc.,

25 <sup>1</sup> *First County Bank v. OpenAI, Inc., et al.*: Notice received January 2, 2026; *DeCruise v. OpenAI, Inc., et*  
26 *al.*: Notice received January 26, 2026; *Jacquez v. OpenAI, Inc., et al.*: Notice received January 29, 2026;  
*Gray v. OpenAI, Inc., et al.*: Notice received January 26, 2026.

27 In advance of the hearing, Petitioners emailed the Court a spreadsheet titled Notice of Submission of  
28 Updated Cases, that included *Taylor Rose Knowlton v. OpenAI, Inc. et al.* Other than this submission, the  
Court did not receive any information that notice according to CRC 3.531 was properly effectuated.

1 OpenAI OPCP, LLC, OpenAI Holdings, LLC, OpenAi Group PBC, and Sam Altman, (collectively,  
2 “Defendants”), submitted a brief in support of the Petition. Plaintiffs Matthew Raine and First County  
3 Bank submitted an opposition to the Petition.

4 The Court, having reviewed and considered the Petition and all filings in response to the Petition,  
5 and heard oral argument, grants the Petition for Coordination. The Court finds the cases subject to the  
6 Petition complex cases within the meaning of California Rules of Court, rule 3.400, and that the cases are  
7 an appropriate matter for coordination pursuant to Code of Civil Procedure sections 404 and 404.1 and  
8 California Rules of Court, rules 3.501, et seq.

9 The Court recommends the Superior Court of California, County of San Francisco, be the site for  
10 the coordinated proceedings, and designates the First Appellate District as the designated District of the  
11 Court of Appeal as the reviewing court.

12 All cases shall be stayed pending the assignment of a Coordination Trial Judge, provided that to  
13 the extent the parties have engaged in discovery and there are outstanding issues concerning the  
14 sufficiency of discovery responses, the stay shall not affect the parties’ obligation to meet and confer in  
15 good faith with respect to outstanding discovery issues. The stay shall preclude the filing of any  
16 discovery motions or further proceedings on pleading challenges. (Cal. Rule of Court, rule 3.529(b).)  
17 Defendants’ Motion for Stay set for February 19, 2026 at 9:30 a.m. in Department 606 is ordered off  
18 calendar as moot.

19 Petitioners must promptly file a copy of this order in each included action, serve it on each party  
20 appearing in the included actions, and submit it to the Chair of the Judicial Council. (Cal. Rule of Court,  
21 rule 3.529(a).)

22 The following cases are subject to this order:

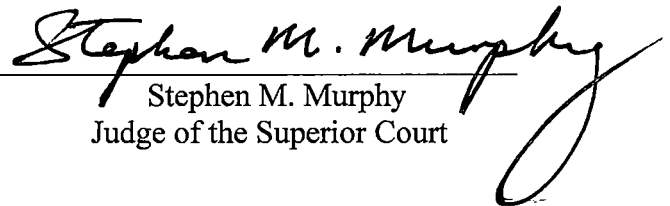
24 Fox v. OpenAI, Inc., et al.	Case No. 25STCV32379
25 Shamblin v. OpenAI, Inc., et al.,	Case No. 25STCV32382
26 Madden v. OpenAI, Inc., et al.	Case No. 25STCV32383

27 Accordingly, the Court declines to deem this case an included action for purpose of the hearing on the  
28 petition for coordination at this time. The matter may be raised with the coordination trial judge.

1	Brooks v. OpenAI, Inc., et al.	Case No. 25STCV32386
2	Lacey v. OpenAI, Inc., et al.	Case No. CGC-25-630808
3	Enneking v. OpenAI, Inc., et al.	Case No. CGC-25-630809
4	Irwin v. OpenAI, Inc., et al.	Case No. CGC-25-630811
5	Raine v. OpenAI, Inc., et al.	Case No. CGC-25-628528
6	First County Bank v. OpenAI, Inc., et al.	Case No. CGC-25-631477
7	DeCruise v. OpenAI, Inc., et al.	Case No. 26CU003118C
8	Jacquez v. OpenAI, Inc., et al.	Case No. 26CV165635
9	Gray v. OpenAI, Inc., et al.	Case No. 26STCV00988

11  
12 **IT IS SO ORDERED.**

13  
14 Dated: February 3, 2026

15   
16 Stephen M. Murphy  
17 Judge of the Superior Court

RECEIVED

Judicial Council of California

NOV 14 2025

*Seung Hee (K.A.)*  
Coordination Lawyer

1 Laura Marquez-Garrett, SBN 221542  
[laura@socialmediavictims.org](mailto:laura@socialmediavictims.org)  
2 Matthew P. Bergman  
[matt@socialmediavictims.org](mailto:matt@socialmediavictims.org)  
3 SOCIAL MEDIA VICTIMS LAW CENTER  
4 600 1st Avenue, Suite 102-PMB 2383  
Seattle, WA 98104  
5 Telephone: (206) 741-4862  
Facsimile: (206) 957-9549  
6

7 Meetal Jain, SBN 214237  
[meetali@techjusticelaw.org](mailto:meetali@techjusticelaw.org)  
8 Sarah Kay Wiley, SBN 321399  
[sarah@techjusticelaw.org](mailto:sarah@techjusticelaw.org)  
9 TECH JUSTICE LAW PROJECT  
10 611 Pennsylvania Avenue, Southeast #337  
Washington DC, 20003

Katheryn Rachel Lanier, SBN 343171  
[Rachel.lanier@lanierlawfirm.com](mailto:Rachel.lanier@lanierlawfirm.com)  
THE LANIER LAW FIRM  
2829 Townsgate Rd Ste 100  
Westlake Village, CA 91361

11 Attorneys for Plaintiffs

12 JUDICIAL COUNCIL OF CALIFORNIA

13 CHAIR OF THE JUDICIAL COUNCIL

14  
15 IN RE: CHATGPT PSYCHOLOGICAL  
16 HARM LITIGATION

Judicial Council Coordination Proceeding

JCCP No. 3131

Case No. 25STCV32382

17 Christopher "Kirk" Shamblin and Alicia  
18 Shamblin, individually and as successors-in-  
19 interest to Decedent, Zane Shamblin,

20 Plaintiffs,

v.

21 OpenAI, Inc., OpenAI OpCo, LLC, OpenAI  
22 Holdings, LLC, and Samuel Altman,

23 Defendants.

MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF PETITION  
FOR COORDINATION AND  
APPLICATION FOR COMPLEX  
DESIGNATION

[Filed concurrently with Petition for  
Coordination and Application for Complex  
Designation and Declaration of Laura  
Marquez-Garrett]

24  
25 Cedric Lacey, individually and as successor-  
in-interest to Decedent, Amaurie Lacey,

26 Plaintiffs,

v.

San Francisco Superior Court  
Case No. CGC-25-630808

1	OpenAI, Inc., OpenAI OpCo, LLC, OpenAI	
2	Holdings, LLC, and Samuel Altman,	
3	Defendants.	
4	Allan Brooks,	Los Angeles Superior Court
5	Plaintiff,	Case No. 25STCV32386
6	v.	
7	OpenAI, Inc., OpenAI OpCo, LLC, OpenAI	
8	Holdings, LLC, and Samuel Altman,	
9	Defendants.	
10	Hannah Madden,	Los Angeles Superior Court
11	Plaintiff,	Case No. 25STCV32383
12	v.	
13	OpenAI, Inc., OpenAI OpCo, LLC, OpenAI	
14	Holdings, LLC, and Samuel Altman,	
15	Defendants.	
16	Karen Enneking, individually and as	San Francisco Superior Court
17	successor-in-interest to Decedent, Joshua	Case No. CGC-25-630809
18	Enneking,	
19	Plaintiffs,	
20	v.	
21	OpenAI, Inc., OpenAI OpCo, LLC, OpenAI	
22	Holdings, LLC, and Samuel Altman,	
23	Defendants.	
24	Jennifer "Kate" Fox, individually and as	Los Angeles Superior Court
25	successor-in-interest to Decedent, Joseph	Case No. 25STCV32379
26	"Joe" Martin Ceccanti,	
27	Plaintiffs,	
28	v.	
	OpenAI, Inc., OpenAI OpCo, LLC, OpenAI	
	Holdings, LLC, and Samuel Altman,	

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Defendants.	
Jacob Lee Irwin,	San Francisco Superior Court
Plaintiff,	Case No. CGC-25-630811
v.	
OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and Samuel Altman,	
Defendants.	

**TABLE OF CONTENTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**I. INTRODUCTION** .....1

**II. FACTUAL BACKGROUND**.....2

    A. ChatGPT Chatbot Harms Litigation .....2

    B. Social Media Victims Law Center and Tech Justice Law Project .....4

    C. Case Summaries .....5

**III. ARGUMENT** .....9

    A. Complex Case Designation is Warranted.....9

    B. Coordination Warranted Under California Code of Civil Procedure 404 and Serves the  
        Interests of Justice ..... 10

**IV. CONCLUSION**.....16

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**TABLE OF AUTHORITIES**

**Page(s)**

**Cases**

*Citicorp North Am., Inc. v. Sup. Ct.*  
(1989) 213 Cal. App. 3d 563 ..... 10

*Ford Motor Warranty Cases*, 11 Cal.App.5th 626 (2017) ..... 11

*Isaak v. Superior Court*,  
73 Cal.App.5th 792 (2022) ..... 12

*McGhan Medical Corp. v. Superior Court*,  
11 Cal.App.4th 804 (1992) ..... *passim*

**Statutes**

California Code of Civil Procedure 404 ..... 10

California Penal Code § 192(b) ..... 13

California Penal Code § 401(a) ..... 13

California Rule of Court 3.400(a) ..... 9

California Rule of Court 3.400(b) ..... 9

California Rule of Court 3.400(c) ..... 1, 2, 9

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**I. INTRODUCTION**

Pursuant to California Rule of Court 3.400(c), Petitioners respectfully seek complex case designations on eight product liability cases involving consumers injured or killed through use of the Open AI Defendants’ generative artificial intelligence (AI) product ChatGPT and to coordinate these cases pursuant to CCP § 404.

All eight cases allege that as designed and developed by Defendants OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, Samuel Altman that the ChatGPT product is unreasonably dangerous; that it was designed, marketed, and distributed without reasonable safety testing and guardrails; that Defendants failed to warn consumers about the risks posed by ChatGPT; and that ChatGPT contained design defects as developed by Defendants. Among the harms alleged are that Defendants’ products were designed to and did foster harmful psychological dependency through features such as a persistent memory that stockpiled intimate personal details, anthropomorphic mannerisms calibrated to convey human-like empathy, heightened sycophancy to mirror and affirm user emotions, algorithmic insistence on multi-turn engagement, and 24/7 availability capable of supplanting human relationships.

Defendants are expected to assert the same defenses in all eight cases.

Litigation of these mass tort cases will involve extensive motion practice involving complex legal issues, wide ranging discovery of terabytes of electronically stored data, and depositions of numerous corporate, lay, and expert witnesses.

Coordination of these eight cases will promote judicial efficiency and economy by providing for the unified management of both pretrial and trial phases of these cases. Despite individual differences between cases, common issues of fact and law predominate, the same group of defendants and same AI product (and even version) is involved, and coordination of discovery and motions practice would maximize efficiency and conserve judicial resources. AI Chatbot harms liability litigation is a newly emerging mass tort with a paucity of appellate authority. Coordination would therefore avoid duplication judicial effort on the many complex legal issues that will be presented throughout the litigation of these cases and avoid the prospect of inconsistent

1 rulings.

2 All eight cases now qualify for complex status under California Rule of Court 3.400(c) and  
3 coordination is amply warranted under CCP § 404 and will manifestly serve the interests of justice.

## 4 II. FACTUAL BACKGROUND

### 5 A. ChatGPT Chatbot Harms Litigation

6 Use of generative artificial intelligence (AI) products has become increasingly common in  
7 multiple aspects of daily life, used by tens of millions of Americans on a regular basis.

8 ChatGPT is the most used AI chatbot product, by far. One March 2025 report determined  
9 that roughly 72% of all persons indicating they used a chatbot had used ChatGPT.<sup>1</sup> While as of  
10 August 2025, the OpenAI defendants claimed to be distributing their ChatGPT product to over  
11 700 million weekly active users (67.7 million being in U.S.).<sup>2</sup> This is a staggering jump of more  
12 than 200 million new weekly users as compared to OpenAI’s March 2025 estimates, while Pew  
13 Research reporting from June 2025 suggests that the number of *adults* using ChatGPT doubled in  
14 just a two year period (from summer of 2023 to June 2025).<sup>3</sup>

15  
16 These numbers are even more significant when one considers that ChatGPT only launched  
17 in November 2022.<sup>4</sup> They also do not fully account for use by minors, or OpenAI Defendants’  
18 targeting of and distribution of its generative AI chatbot products in American schools. Pew  
19 Research reported in 2024 that “twice as many teens now say they use ChatGPT for schoolwork  
20 as in 2023.”<sup>5</sup> While some reports even as far back as 2023 were estimating use of ChatGPT by at  
21 least 33% of kids ages 12-27 in connection with school.<sup>6</sup>

22 \_\_\_\_\_  
23 <sup>1</sup> <https://imaginingthedigitalfuture.org/reports-and-publications/close-encounters-of-the-ai-kind/close-encounters-of-the-ai-kind-main-report/>

24 <sup>2</sup> <https://backlinko.com/chatgpt-stats>

25 <sup>3</sup> <https://www.pewresearch.org/short-reads/2025/06/25/34-of-us-adults-have-used-chatgpt-about-double-the-share-in-2023/>

26 <sup>4</sup> *Id.*

27 <sup>5</sup> <https://www.pewresearch.org/short-reads/2025/01/15/about-a-quarter-of-us-teens-have-used-chatgpt-for-schoolwork-double-the-share-in-2023/>

28 <sup>6</sup> <https://www.atpe.org/News-Media/Magazine/ATPE-News-Summer-2023/ChatGPT>

1 In short, and as with social media products, generative AI products – ChatGPT in particular  
2 – are taking off at staggering speeds and being used by more than half of the U.S. population,  
3 including children and other vulnerable consumers, despite the complete lack of regulatory or  
4 industry oversight or safeguards. Consumers are at risk at an industrial scale.

5 While all age groups indicate a significant percentage of active ChatGPT users, not all of  
6 these cohorts use ChatGPT in the same way or to the same extent. ChatGPT and analogous AI  
7 chatbots can cause psychosis in unsuspecting users. This is particularly true when such AI chatbots  
8 are designed to adopt human-like mannerisms and affectations, which design choices are deceptive  
9 and foreseeably harmful to vulnerable users.<sup>7</sup>

10 Such designs are capable of leading users to perceive or interact with such chatbots as  
11 equivalent to human therapists or analogous figures, such as close and intimate friends and  
12 confidants, which confusions then pose a risk of exacerbating existing mental health issues or  
13 contributing to the development of new mental health issues, such as delusional thinking,  
14 particularly when the “relationship” with the chatbot becomes characterized by overreliance, role  
15 confusion, and, perhaps most concerningly, reinforcement of vulnerable thoughts.<sup>8</sup>

16 ChatGPT reinforces negative or distorted thinking patterns, including sadness, paranoia, or  
17 delusional ideation, and including by mirroring or failing to challenge a user’s maladaptive beliefs  
18 and even validating and promoting continued engagement with these beliefs and patterns.<sup>9</sup>

19 ChatGPT also frequently fails to detect or appropriately respond to signs of acute distress  
20 or delusions, leaving users unsupported in critical moments. This results in unpredictable, biased,  
21 or even harmful outputs, likely to be misinterpreted by users experiencing AI-related delusional  
22

23  
24

---

25 <sup>7</sup> Hasei, J., Hanzawa, M., Nagano, A., Maeda, N., Yoshida, S., Endo, M., Yokoyama, N., Ochi, M., Ishida, H.,  
26 Katayama, H., Fujiwara, T., Nakata, E., Nakahara, R., Kunisada, T., Tsukahara, H., & Ozaki, T. (2025).  
27 Empowering pediatric, adolescent, and young adult patients with cancer utilizing generative AI chatbots to reduce  
28 psychological burden and enhance treatment engagement: a pilot study. *Frontiers in Digital Health*, 7.  
<sup>8</sup> Khawaja, Z., & Bélisle-Pipon, J. (2023). Your robot therapist is not your therapist: understanding the role of AI-  
powered mental health chatbots. *Frontiers in Digital Health*, 5.  
<sup>9</sup> De Freitas, J., Uğuralp, A., Oğuz-Uğuralp, Z., & Puntoni, S. (2023). Chatbots and Mental Health: Insights into the  
Safety of Generative AI. *Journal of Consumer Psychology*.

1 disorder or at risk for psychotic episodes with catastrophic consequences.<sup>10</sup> These risks extend  
2 beyond the systems design-based failure to recognize danger, including apparent inability to  
3 recognize and amplify opportunities to intervene on delusional or high-risk thinking when users  
4 express moments of ambivalence or insight.

5 The lack of empathy, inability to recognize crisis, and potential for reinforcing maladaptive  
6 beliefs among ChatGPT’s AI chatbot systems further pose significant dangers for vulnerable users  
7 and may function by exacerbating the aberrant salience phenomenon of at-risk users to exacerbate  
8 these dangers.<sup>11</sup>

9 These all are design-based harms that pose serious, life-threatening risks to a significant  
10 percentage of the U.S. population, including children, teens, young adults, and vulnerable adults.

11 **B. Social Media Victims Law Center and Tech Justice Law Project**

12 The Social Media Victims Law Center (SMVLC) was established in 2021 to respond to  
13 the Social Media youth mental health crisis, while Tech Justice Law Project (TJLP) was formed  
14 to bring justice to communities harmed by tech products. Both firms seek to apply traditional  
15 product liability concepts to hold tech companies legally accountable for alleged design defects in  
16 their products that cause harm to vulnerable consumers.

17 The two firms also filed the first wrongful death in the nation against an AI company based  
18 on similar legal claims against another generative AI company, Character.AI, Google, and  
19 Character.AI’s co-founders Noam Shazeer and Daniel DeFreitas, in October 2024 and in  
20 connection with the defective Character.AI chatbot product. Since then, the two firms collectively  
21 have undertaken the representation of five other families in courts around the country against  
22 Character.AI, Google, and Character.AI’s co-founders, and represent several more families in  
23 various states in claims not yet filed against the Character.AI defendants as well as other generative  
24

25 \_\_\_\_\_  
26 <sup>10</sup> Chin, H., Song, H., Baek, G., Shin, M., Jung, C., Cha, M., Choi, J., & Cha, C. (2023). The Potential of Chatbots  
27 for Emotional Support and Promoting Mental Well-Being in Different Cultures: Mixed Methods Study. *Journal of  
28 Medical Internet Research*, 25.

<sup>11</sup> Kowalski, J., Aleksandrowicz, A., Dąbkowska, M., & Gawęda, Ł. (2021). Neural Correlates of Aberrant Salience  
and Source Monitoring in Schizophrenia and At-Risk Mental States—A Systematic Review of fMRI Studies.  
*Journal of Clinical Medicine*, 10.

1 AI chatbot platforms.

2 In the summer of 2025, TJLP investigated and began preparing for the first lawsuit against  
3 the OpenAI Defendants, which built in large part on the Character.AI case findings and claims.  
4 TJLP then co-counseled with Edelson PC, and the two firms filed the lawsuit against the OpenAI  
5 defendants titled *Matthew Raine and Maria Raine, individually and as successors-in-interest to*  
6 *Decedent Adam Raine v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, Samuel*  
7 *Altman, John Doe Employees 1-10, and John Doe Investors 1-10*, on August 26, 2026. TJLP is  
8 no longer counsel on the *Raine* matter but was involved in all aspects of the preparation and filing  
9 of the original complaint.

10 On November 6, 2025, SMVLC, TJLP, and The Lanier Law Firm filed the second lawsuit  
11 against Open AI, titled *Christopher “Kirk” Shamblin and Alicia Shamblin, individually and as*  
12 *successors-in-interest to Decedent, Zane Shamblin v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI*  
13 *Holdings, LLC, and Samuel Altman*, Los Angeles Superior Court Case No. 25STCV32382.  
14 SMVLC and TJLP then filed five more cases against the OpenAI Defendants in Los Angeles and  
15 San Francisco County courts, as set forth in the above caption and in more detail below.

16 In total, SMVLC and TJLP currently have six cases involving AI Chatbots against  
17 Character.AI pending in federal courts and seven cases involving AI Chatbots against ChatGPT  
18 pending in California State Courts. These two firms have been litigating and investigating these  
19 types of AI Chatbot related harms since July 2024 and filed the first case alleging such harms in  
20 October 2024. Both firms have retained multiple experts in the AI and related fields, which experts  
21 likely will be relevant to the eight cases pending against OpenAI in California Courts.

22 **C. Case Summaries**

23 Petitioners seek to coordinate the cases listed below as well as similar cases filed in and to  
24 be filed in the State of California that constitute the subject of the herein petition.

- 25
- 26 1. *Christopher “Kirk” Shamblin and Alicia Shamblin, individually and as*  
27 *successors-in-interest to Decedent, Zane Shamblin v. OpenAI, Inc., OpenAI*  
28 *OpCo, LLC, OpenAI Holdings, LLC, and Samuel Altman*, Los Angeles Superior  
Court Case No. 25STCV32382, filed November 6, 2025.

1 Nature of Case. Wrongful death and survivorship action brought by parents arising out of  
2 the death of their Zane Shamblin (age 23), who died as the result of ChatGPT caused  
3 harms such as AI-related delusional disorder, suicidal ideation, and death.

4 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
5 Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
6 defendants has been ascertained.

7 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
8 defect, failure to warn, and Negligence Per Se), Unfair Business Practice, and Wrongful  
9 Death.

10 Plaintiffs' Counsel. Social Media Victims Law Center, Tech Justice Law Project, The  
11 Lanier Law Firm.

12 2. *Jennifer "Kate" Fox, individually and as successor-in-interest to Decedent,*  
13 *Joseph "Joe" Martin Ceccanti v. OpenAI OpCo, LLC, OpenAI Holdings, LLC,*  
14 *and Samuel Altman, Los Angeles Superior Court Case No. 25STCV32379, filed*  
15 *November 6, 2025.*

16 Nature of Case. Wrongful death and survivorship action brought by spouse arising out of  
17 the death of her husband Joe Ceccanti (age 48), who died as the result of ChatGPT  
18 caused harms such as AI-related delusional disorder, suicidal ideation, and death.

19 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
20 Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
21 defendants has been ascertained.

22 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
23 defect, failure to warn, and Negligence Per Se), Unfair Business Practice, and Wrongful  
24 Death.

25 Plaintiffs' Counsel. Social Media Victims Law Center and Tech Justice Law Project.

26 3. *Hannah Madden v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC,*  
27 *and Samuel Altman, Los Angeles Superior Court Case No. 25STCV32383, filed*  
28 *November 6, 2025.*

Nature of Case. Personal injury action arising from injuries to Hannah Madden (32) as  
the result of ChatGPT caused harms such as AI-related delusional disorder and suicidal  
ideation.

Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
defendants has been ascertained.

Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
defect and failure to warn), Unfair Business Practice, and Wrongful Death.

1 Plaintiffs' Counsel. Social Media Victims Law Center and Tech Justice Law Project.

2 4. *Allan Brooks v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and*  
3 *Samuel Altman*, Los Angeles Superior Court Case No. 25STCV32386, filed  
4 November 6, 2025.

4 Nature of Case. Personal injury action arising from injuries to Allan Brooks (48) as the  
5 result of ChatGPT caused harms such as AI-related delusional disorder.

6 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
7 Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
8 defendants has been ascertained.

8 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
9 defect and failure to warn), and Unfair Business Practice.

10 Plaintiffs' Counsel. Social Media Victims Law Center and Tech Justice Law Project.

11 5. *Cedric Lacey, individually and as successor-in-interest to Decedent, Amaurie*  
12 *Lacey v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and Samuel*  
13 *Altman*, San Francisco Superior Court Case No. CGC-25-630808, filed November  
14 6, 2025.

14 Nature of Case. Wrongful death and survivorship action brought by a parent arising out  
15 of the death of Amaurie Lacey (age 17), who died as the result of ChatGPT caused harms  
16 such as AI-related delusional disorder, suicidal ideation, and death.

16 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
17 Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
18 defendants has been ascertained.

19 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
20 defect, failure to warn, and Negligence Per Se), Unfair Business Practice, and Wrongful  
21 Death.

21 Plaintiffs' Counsel. Social Media Victims Law Center and Tech Justice Law Project.

22 6. *Karen Enneking, individually and as successor-in-interest to Decedent, Joshua*  
23 *Enneking v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and*  
24 *Samuel Altman*, San Francisco Superior Court Case No. CGC-25-630809, filed  
25 November 6, 2025.

25 Nature of Case. Wrongful death and survivorship action brought by a parent arising out  
26 of the death of Joshua Enneking (age 32), who died as the result of ChatGPT caused  
27 harms such as AI-related delusional disorder, suicidal ideation, and death.

1 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
2 Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
defendants has been ascertained.

3 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
4 defect, failure to warn, and Negligence Per Se), Unfair Business Practice, and Wrongful  
Death.

5 Plaintiffs' Counsel. Social Media Victims Law Center and Tech Justice Law Project.

6 7. *Jacob Lee Irwin v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC,*  
7 *and Samuel Altman*, San Francisco Superior Court Case No. CGC-25-630811,  
8 filed November 6, 2025.

9 Nature of Case. Personal injury action arising from injuries to Jacob Irwin (30) as the  
10 result of ChatGPT caused harms such as AI-related delusional disorder and suicidal  
ideation.

11 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC, and  
12 Samuel Altman. Plaintiffs anticipate adding DOE defendants once the identity of those  
defendants has been ascertained.

13 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
14 defect and failure to warn), Unfair Business Practice, and Wrongful Death.

15 Plaintiffs' Counsel. Social Media Victims Law Center and Tech Justice Law Project

16 8. *Matthew Raine and Maria Raine, individually and as successors-in-interest to*  
17 *Decedent Adam Raine v. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings,*  
18 *LLC, Samuel Altman, John Doe Employees 1-10, and John Doe Investors 1-10,*  
San Francisco Superior Court Case No. CGC-25-628528, filed August 26, 2025.

19 Nature of Case. Wrongful death and survivorship action brought by parents arising out of  
20 the death of Adam Raine (age 16), who died as the result of ChatGPT caused harms such  
as AI-related delusional disorder, suicidal ideation, and death.

21 Named Defendants. OpenAI, Inc., OpenAI OpCo, LLC, OpenAI Holdings, LLC,  
22 Samuel Altman, John Doe Employees 1-10, and John Doe Investors 1-10.

23 Claims. Strict Product Liability (design defect and failure to warn), Negligence (design  
24 defect, failure to warn), Unfair Business Practice, and Wrongful Death.

25 Plaintiffs' Current Counsel. Edelson PC.

26

27

28

1  
2 **III. ARGUMENT**

3 **A. Complex Case Designation is Warranted**

4 Under the California Rules of Court, a case is considered complex if it “requires  
5 exceptional judicial management to avoid placing unnecessary burdens on the court or the litigants  
6 and to expedite the case, keep costs reasonable, and promote effective decision making by the  
7 court, the parties, and counsel.” California Rule of Court 3.400(a). In deciding whether an action  
8 is a complex, a court must consider, among other things, whether the action is likely to involve:  
9 (1) Numerous pretrial motions raising difficult or novel legal issues that will be time-consuming  
10 to resolve; (2) Management of a large number of witnesses or a substantial amount of documentary  
11 evidence; (3) Management of a large number of separately represented parties; (4) Coordination  
12 with related actions pending in one or more courts in other counties, states, or countries, or in a  
13 federal court; or (5) Substantial post judgment judicial supervision. California Rule of Court  
14 3.400(b). Certain types of cases are deemed provisionally complex including “claims involving  
15 mass torts.” California Rule of Court 3.400(c).

16 Here, the above-referenced cases satisfy multiple criteria for complex designation. First, as  
17 mass tort claims, these cases are presumptively complex. California Rule of Court 3.400(c).  
18 Second, as an emerging tort with scant controlling appellate authority, litigation of these cases will  
19 involving numerous pretrial motions involving complex and novel legal issues. Third, each case  
20 will require depositions of numerous corporate witness, experts and lay witnesses, production of  
21 thousands of documents and electronic records and promulgation of ESI protocols and complex  
22 protective orders. These cases do not exist in isolation. SMVLC and TJLP are aware of and in the  
23 process of investigating dozens of other potential claimants with similar claims as against these  
24 same Defendants.

25 These cases satisfy several of the criteria for complex case designation under California  
26 Rule of Court 3.400(c), any one of which be sufficient to warrant such treatment. The Court should  
27 therefore designate these cases as complex.  
28

1 **B. Coordination Warranted Under California Code of Civil Procedure 404 and Serves**  
2 **the Interests of Justice**

3 1. *Standard for Coordination Under Section 404*

4 Coordination is the joinder of two or more complex actions sharing a common question of  
5 law or fact that are pending in different courts. CCP § 404. Coordination promotes “judicial  
6 efficiency and economy by providing for the unified management of both pretrial and trial phases  
7 of the coordinated cases.” *Citicorp North Am., Inc. v. Sup. Ct.* (1989) 213 Cal. App. 3d 563, 565

8 n.3. Coordination of civil cases is governed by CCP § 404 which provides as follows:

9 Coordination of civil actions sharing a common question of fact or law is  
10 appropriate if one judge hearing all of the actions for all purposes in a selected  
11 site or sites will promote the ends of justice taking into account whether the  
12 common question of fact or law is predominating and significant to the litigation;  
13 the convenience of parties, witnesses, and counsel; the relative development of  
14 the actions and the work product of counsel; the efficient utilization of judicial  
15 facilities and manpower; the calendar of the courts; the disadvantages of  
16 duplicative and inconsistent rulings, orders, or judgments; and, the likelihood of  
17 settlement of the actions without further litigation should coordination be denied.

18 The purpose centralization under § 404 is “vest in one administrator the power to organize  
19 the litigation in an efficient and equitable manner, for the benefit of all.” *McGhan Medical Corp.*  
20 *v. Superior Court*, 11 Cal.App.4th 804, 813 (1992). However, coordination does not mean that  
21 cases need be tried in one forum or even indicate that ultimate trial of the cases need be unified.  
22 *Id.* at 813. Rather, the coordinating judge is accorded “whatever great breadth of discretion may  
23 be necessary and appropriate to ease the transition through the judicial system of the logjam of  
24 cases which gives rise to coordination.” *Id.* at 269-70

25 2. *All Eight Cases Share Common Questions of Fact and Law*

26 California courts have broadly interpreted the “common question of fact or law” criteria in  
27 § 404 in favor of coordination. In *McGhan*, for example, the plaintiffs sought coordination of 600  
28 breast implant cases brought against several different manufacturers of the implant devices,  
producers of implant materials, and physicians who prescribed or administered the implants. 11  
Cal.App.4<sup>th</sup> at 807. The court denied coordination on the ground that that “common questions of  
fact or law do not predominate in that the cases involve different implants, different designs,  
different warnings, different defendants, different theories of defect, different modes of failure,

1 and different injuries.” *Id.* At 266. However, The Court of Appeals rejected this finding, holding  
2 that § 404 vests the coordinating judge with broad discretion to structure pretrial discovery and  
3 motions practice and segment cases or issues in the interests of efficiency. *Id.* at 269-270. The fact  
4 that the cases included doctors who installed the breast implants along with product manufactures  
5 and material suppliers did not militate against coordination. Rather, the Court of Appels held that  
6 the doctors’ concerns “should be presented to the coordinating judge, who has the power under  
7 applicable rules to sever any such unique cases, or to make other provisions for same which will  
8 adequately address the concerns of those who can establish a unique status.” *Id.* at 812. Nor was  
9 the Court of Appeals persuaded that naming different breast implant manufacturers and material  
10 suppliers as defendants meant that the cases did not involve common issues of fact or law. Rather,  
11 the Court explained:

12       Aside from the medical malpractice claims, the complaints all allege damages as  
13       the result of some product defect. While the products are several and differ in terms  
14       of manufacture, design and content, they are all similar in that they relate to [breast](#)  
15       [implant](#) devices. The causes of action in most of the complaints are uniform (strict  
16       products liability, negligence, breach of warranty, fraud and deceit,  
17       misrepresentation, intentional infliction of emotional distress, loss of consortium).  
      We are absolutely satisfied that the preparation for trial in terms of depositions,  
interrogatories, admissions, collection of physical data, etc., will be better achieved  
if done in a coordinated manner.

18 *Id.* at 814

19       The Court of Appeals applied a similarly pragmatic approach to § 404 in *Ford Motor*  
20 *Warranty Cases*, 11 Cal.App.5th 626 (2017), where the coordinating judge declined to add 460  
21 additional cases to a consolidated proceeding against automobile manufacturer and multiple  
22 dealers alleging violations of the state “Lemon Law.” The coordinating judge found that Lemon  
23 Law cases are “not amenable to complex management” because each vehicle had a different dealer,  
24 components and repair history “litigating issues regarding the defective transmissions will  
25 inherently be heavily individualized as to each individual vehicle and would not be a  
26 predominating fact significant to this litigation,” *Id.* at 231-32. However, the Court of Appeals  
27 rejected this reasoning finding “no basis” for concluding that lemon law cases are not suitable for  
28 coordination. *Id.* at 195. While recognizing that the cases “raise individual issues” the court found

1 that “a great deal of efficiency can be accomplished by coordinating lemon law cases . . . despite  
2 individual issues relating to repair histories.” *Id.* Finding a sufficiently common issues issue of law  
3 and fact to satisfy § 404 the court of appeals held that “the benefits of early coordination of  
4 discovery and motion practice . . . are in no way negated by the court’s concern over litigation that  
5 is “heavily individualized as to each vehicle.” *Id.* at 197. *See also Isaak v. Superior Court*, 73  
6 Cal.App.5th 792, 795-95 (2022) (coordinated proceeding against four different manufacturers of  
7 the herbicide Paraquat).

8           Based upon the holdings in *McGhan* and *Ford*, these cases clearly satisfy the “common  
9 issue of fact or law: criterion of § 404. All eight cases involve consumers who sustained serious  
10 physical and mental health injuries through their use of Defendants’ AI Chatbot product, ChatGPT.  
11 Indeed, all eight cases specifically allege harms arising on connection with ChatGPT 4o, and  
12 deaths and harms that arose in or after April 2025.

13           These cases all include common allegations, including that Defendants’ products are  
14 unreasonably dangerous because they were designed, marketed, and distributed without reasonable  
15 safety testing and guardrails for minors and other vulnerable users; that the resulting harms were  
16 the result of deliberate design choices; that Defendants failed to warn users and parents of minors  
17 of known hazards arising out of the foreseeable use of their products; and that specific features  
18 were designed to foster psychological dependency, including things such as a persistent memory  
19 that stockpiled intimate personal details, anthropomorphic mannerisms calibrated to convey  
20 human-like empathy, heightened sycophancy to mirror and affirm user emotions, algorithmic  
21 insistence on multi-turn engagement, and 24/7 availability capable of supplanting human  
22 relationships.

23           These cases also all involve the same defendants, the only exception being that the case  
24 filed by Edelson PC and TJLP (currently only involved Edelson PC) named DOE employees and  
25 investors, while other seven plaintiffs intend to name DOE defendants as identities are ascertained  
26 in the course of discovery. This is a difference of timing, at best.

27           There is an identical overlap of the defective product and product features at issue in these  
28 cases and operated by these defendants, with the only differences being a follows,



1 conserving their resources through joint discovery that will benefit all parties. Judicial resources  
2 will also be conserved in overseeing settlement negotiations.

3 *4. The Relative Development of these Cases Favor Coordination*

4 A petition for coordination “may be made at any time after filing of the complaint.” (CRC  
5 3.521(a)). An important factor in Section 1404 is whether coordination will result in delay or  
6 duplication of effort. See, e.g., *Ford*, 11 Cal.App.5th at 628 (addition of new cases to coordinated  
7 proceeding appropriate “where there is no risk that new counsel representing plaintiffs in the add-  
8 on cases will seek to depose witnesses whose depositions were already taken.”). Here, the timing  
9 for Coordination is optimal given the infancy of all of the cases at issue. Indeed, even though the  
10 first-filed case was filed in August 2025 – three months ago – no dispositive motion or answer has  
11 yet to be filed. Discovery has not begun in any of these cases. The undeveloped nature of these  
12 cases therefore strongly favors coordination.

13 *5. Coordination Will Benefit the Court’s Calendar*

14 The undersigned law firm currently has filed seven cases in Los Angeles and San Francisco  
15 counties and anticipates filing additional in various counties in California on behalf of California  
16 residents. One other law firm has a similar case pending in San Francisco County. Each one of these  
17 cases has or will shortly receive a separate scheduling order and each court will need to schedule  
18 separate status conferences, motions hearings, settlement conferences, and trial for each case.  
19 Coordination will unburden the judicial system and the various courts in which similar claims are  
20 filed by avoiding repeated adjudication of common questions of law and fact involving the same  
21 Defendants and theories of liability.

22 *6. Coordination Will Prevent Duplicate and Inconsistent Rulings*

23 In complex mass-tort litigation, cases are frequently resolved in whole or in part through  
24 motions practice. Even non-dispositive rulings play a significant role in shaping the case and  
25 identifying the claims, defenses and damages that are ultimately presented at trial. One of the stated  
26 goals of coordination under § 404 to avoid duplication judicial resources and prevent inconsistent  
27 rulings on important legal issues. In *McGhan*, the Court of Appeals recognized avoiding  
28 inconsistent legal rulings as an important benefit of coordination.

1 Assuredly some of the aforementioned classes of causes of action will be subject to  
2 demurrer and summary judgment by some of the defendants. The rulings on these  
3 motions should be uniform. If possible, trial rulings should be accomplished in a  
4 manner permitting uniform and centralized resolution on appeal. This sort of  
5 treatment can be achieved by coordination of motion practice.

6 11 Cal.App.4th at 814.

7 Here, adjudication of these cases will be heavily dependent on motion practice. At the  
8 outset, each case will face a demurrer on presumably the same ground across all matters, likely to  
9 include First Amendment arguments. Adjudication of these motions will require extensive review  
10 of applicable law and of the factual allegations in Plaintiffs' complaint. Petitioners also anticipate  
11 that the parties will require judicial assistance defining the appropriate scope and timing of  
12 discovery and detethering procedures for reviewing the terabytes of electronic data anticipated.

13 Finally, given that we are in early stage of this ChatGPT Chatbot harms product liability  
14 litigation and that both liability and causation issues will involve expert testimony, *Sargon*  
15 challenges from both plaintiffs and defendants are virtually inevitable. At the conclusion of  
16 discovery, plaintiffs will likely seek partial summary judgment on certain defenses and defendants  
17 will inevitably seek summary judgment as well. Finally, because no Chatbot harms product  
18 liability case has ever gone to trial and because the only other Chatbot harms product liability cases  
19 pending in the U.S. are in federal courts outside of California and the Ninth Circuit (including  
20 Florida, Texas, Colorado, and New York) the California court's rulings on motions in limine and  
21 evidentiary objections at trial will be on a table rasa.

22 Given the early development of this litigation and the complexity of the legal issues  
23 presented, it is virtually inevitable that absent coordination trial courts will issue duplicate and  
24 inconsistent rulings on these important issues. Coordination is therefore necessary to will make it  
25 impossible to have "uniform and centralized resolution on appeal . . . achieved by coordination of  
26 motions practice." *McGhan*, 11 Cal.App.4th at 814.

#### 27 7. *Coordination May Foster Eventual Settlement*

28 The final factor to be considered is "the likelihood of settlement of the actions without  
further litigation should coordination be denied." At this early stage in the litigation with so many  
unresolved factual and legal questions, it is difficult to assess the realistic prospect of settlement.

1 However, experience in other complex mass torts teaches that settlement is almost always  
2 premised on individual cases being consolidated through state-court coordinated proceeding, a  
3 federal MDL or class action. To the extent that settlement of these of these cases is possible,  
4 coordination will enable the parties and the Court to take a more global approach to resolution and  
5 focus their attention on the issues most salient to settlement.

6 Conversely, if coordination is denied, it would likely impede efforts to settle the cases  
7 because, when cases are coordinated, the parties – at the Court’s urging – are required to create  
8 organized plans for mediation or settlement. As such, coordination should lead to more sufficient  
9 and successful settlement discussions.

10 **IV. CONCLUSION**

11 For the above reasons, Petitioners-Plaintiffs respectfully request that the Council grant this  
12 request for complex case designation and petition for coordination and assign the cases identified  
13 herein, and any future-filed complex cases that merit coordination.

14 DATED this 14th day of November 2025.

15 SOCIAL MEDIA VICTIMS LAW CENTER PLLC

16  
17 By: 

18 Laura Marquez-Garrett, SBN 221542  
[laura@socialmediavictims.org](mailto:laura@socialmediavictims.org)

19 Matthew P. Bergman  
*(pro hac vice anticipated)*  
[matt@socialmediavictims.org](mailto:matt@socialmediavictims.org)

20 SOCIAL MEDIA VICTIMS LAW CENTER  
21 600 1st Avenue, Suite 102-PMB 2383  
22 Seattle, WA 98104  
23 Telephone: (206) 741-4862  
24 Facsimile: (206) 957-9549

25 Meetali Jain, SBN 214237  
[meetali@techjusticelaw.org](mailto:meetali@techjusticelaw.org)  
26 Sarah Kay Wiley, SBN 321399  
[sarah@techjusticelaw.org](mailto:sarah@techjusticelaw.org)  
27 TECH JUSTICE LAW PROJECT  
28 611 Pennsylvania Avenue, Southeast #337  
Washington DC, 20003

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Katheryn Rachel Lanier, SBN 343171  
[Rachel.lanier@lanierlawfirm.com](mailto:Rachel.lanier@lanierlawfirm.com)  
THE LANIER LAW FIRM  
2829 Townsgate Rd Ste 100  
Westlake Village, CA 91361

Attorneys for Plaintiffs