

B U L L E T I N

June 25, 2025

Dear Subscriber:

Periodically, when the courts publish only a limited number of cases that affect chapters in the Sourcebook, we issue a Bulletin in lieu of a full Revision Packet. The cases listed below will be included in the July 2025 Revision No. 232:

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*Heather Gimle, Editor*  
Deputy Attorney General



**Recent Case:**

- **People v. Porter** (2025) 2025 WL 1573216 [Court of Appeal, Sixth District, California, case number H052404, filed 6/3/25]

Vehicle Code § 23123.5 (a) prohibits drivers from “holding and operating” a handheld wireless telephone while driving. The court held that the term “operating” prohibits a driver from holding a phone to view a mapping application.

Please note: a petition for review in the California Supreme Court can still be filed in this case allowing appellate review of this decision.

**Certiorari Granted:**

- **Case v. Montana**, United States Supreme Court, case number 24-624 [6/2/25]

The question presented is: “Whether law enforcement may enter a home without a search warrant based on less than probable cause that an emergency is occurring, or whether the emergency-aid exception requires probable cause.”