

Calif. Award Vacated After Arbitrator Attends Law Firm Event

By **Joyce Hanson**

Law360 (August 19, 2026, 9:34 PM EDT) -- A California state judge has vacated an arbitration award issued to two real estate buyers in a breach of contract dispute with an investor, ruling that the JAMS arbitrator failed to disclose her participation in a public event sponsored by the law firm representing the buyers.

Los Angeles Superior Court Judge Wendy Chang on Aug. 12 denied buyers William Hall and Leila Hall's motion to confirm the arbitration award and granted Elden Investments LLC's cross-petition to vacate the award, requiring the firm to return a \$132,265 deposit with interest and pay for attorney fees.

JAMS arbitrator and retired San Diego Superior Court Judge Randa M. Trapp failed to disclose circumstances that created an appearance of partiality, Judge Chang found.

She said the JAMS arbitrator "participated in a panel branded and hosted by petitioners' counsel's law firm between the filing of the interim award and the final award," adding that Judge Trapp did not disclose her participation on the panel. The Halls' lawyer is Daniel A. Lawton of Klinedinst PC.

"The question is not whether the arbitrator was actually biased," Judge Chang wrote. "The question is whether a reasonable person aware of the facts could entertain doubt that the arbitrator could be impartial in this case. The court finds that the fact that the arbitrator allowed herself to be held out out as a panelist in the private firm's branded public event that was designed to highlight and honor her professional achievements, while this case was pending with the same firm representing one of the parties, could cause a reasonable person to entertain a double about the arbitrator's impartiality."

Judge Trapp could not be reached immediately for comment Wednesday.

According to a lawyer for Elden Investments, Ehab M. Samuel of Orbit IP LLP, the decision appears to be the first major California arbitration-vacatur ruling of its kind in more than a decade, since the state Court of Appeal's 2013 decision in [Mt. Holyoke Homes LP v. Jeffer Mangels Butler & Mitchell LLP](#).

"What makes this decision notable is not simply that it applies Mt. Holyoke, but that there has been no similarly prominent California decision in the intervening years applying the appearance-of-partiality standard to vacate an arbitration award on comparable disclosure grounds," Samuel said in a statement.

Samuel told Law360 in an email Wednesday that after the arbitration concluded, the Halls filed their petition to confirm the award in San Diego County, even though the parties' agreement called for confirmation in Los Angeles, where the property at issue is located, and the arbitration itself took place in Los Angeles.

"That unusual filing prompted us to look more closely at potential connections between the San Diego-based arbitrator and the Halls' counsel," Samuel wrote. "That investigation ultimately uncovered Judge Trapp's participation in Klinedinst's public, firm-branded 'Trailblazers' webinar while the arbitration was still pending — an appearance that had never been disclosed to Elden."

On Wednesday, Lawton told Law360 he did not know at the time that Judge Trapp had served as an

unpaid panelist for one of his firm's webinars.

"In a private conversation I had with her yesterday, she didn't even remember the webinar," Lawton said. "It had zero relation to the matters involving the Halls.

Lawton added that the Halls, as would-be buyers of the commercial condo, had entered into a contract with Elden saying if escrow did not close, the Halls would be entitled to a return of their earnest money deposit. The deal did not close and the Halls requested return of their escrow, but Elden refused to return it, according to Lawton.

"Going back to 2022, the value of the award is about \$274,000 today," Lawton said. "The Halls are not walking away. They're looking at their options, including an appeal."

He said he viewed Judge Chang's ruling as "a real miscarriage of justice" with a decision that used "hair-splitting academic logic divorced from the reality of life and justice."

"It unfairly criticizes a retired judge and arbitrator who is renowned for her fairness and honesty," Lawton said. "San Diego is a relatively small bar. Judges and lawyers often come into contact with each other. This should not be the basis of blowing up an arbitral award."

William Hall and Leila Hall are represented by Daniel A. Lawton of Klinedinst PC.

Elden Investments is represented by Ehab M. Samuel and Robert W. Dickerson Jr. of Orbit IP LLP.

The case is Leila Hall et al. v. Elden Investments LLC, case number 26STCP01203, in the Superior Court of California, County of Los Angeles, Civil Division.

--Editing by Vaqas Asghar.