IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

No. S266254

BRENNON B.,
Petitioner,

v.

SUPERIOR COURT OF CONTRA COSTA COUNTY,
Respondent,

WEST CONTRA COSTA UNIFIED SCHOOL DISTRICT, et al.,
Real Parties in Interest.

Court of Appeal of California
First District, Division One
No. A157026

Superior Court of California
Contra Costa County
No. MSC1601005
Hon. Charles Treat

PETITIONER'S ANSWER TO AMICI CURIAE BRIEFS

Alan Charles Dell'Ario (SBN 60955)
ATTORNEY AT LAW
PO Box 359
Napa, CA 94559
(707) 666-5351
charles@dellario.org

Micha Star Liberty (SBN 215687)
LIBERTY LAW OFFICE
1970 Broadway, Suite 700
Oakland, CA 94612
(510) 645-1000
micha@libertylaw.com

Attorneys for Petitioner
Brennon B.

TABLE OF CONTENTS

Page

COVER PAGE 1

TABLE OF CONTENTS 2

TABLE OF AUTHORITIES 3

PETITIONER'S ANSWER TO AMICI CURIAE BRIEFS 6

I. Brennon's amici confirm the Legislature's long-standing intent to provide victims of disability discrimination with the broadest remedies possible. 7

A. The Legislature has had thirty years to address the judicial interpretation of the Act and has not changed it. 7

B. The public agency and public school interpretation of the Act is consistent with Brennon's interpretation. It applies to public schools. . 9

C. Section 51 subdivision (f) may stand alone from the rest of the Act. 10

II. The "too costly to schools" arguments of the District's amici cannot bear the weight of the contrary legislative enactments and policy statements. 10

III. Section 52, subdivision (a)'s penalties are not "punitive damages" within the meaning of Government Code section 818. 14

CONCLUSION 15

CERTIFICATE OF COMPLIANCE 18

PROOF OF SERVICE 19

TABLE OF AUTHORITIES

Page

Cases:

Altaville Drug Store, Inc. v. Emp.'t Dev. Dep't
(1988) 44 Cal.3d 231 13

Burks v. Poppy Const. Co.
(1962) 57 Cal.2d 463 16

C.A. v. William S. Hart Union High Sch. Dist.
(2012) 53 Cal.4th 861 16

Collins v. Thurmond
(2019) 41 Cal.App.5th 879 13

Dept. of Fair Emp.'t & Hous. v. Univ. of Calif. Berkeley
(Cal.F.E.H.C. Nov. 18, 1993) 1993 WL 726830 9

Donovan v. Poway Unif. Sch. Dist.
(2008) 167 Cal.App.4th 567 6

Hicks v. E.T. Legg & Assocs.
(2001) 89 Cal.App.4th 496 13

Kiser v. Cnty. of San Mateo
(1991) 53 Cal.3d 139 14

Koire v. Metro Car Wash
(1985) 40 Cal.3d 24 14

Mackey v. Bd. of Trs. of Cal. State Univ.
(2019) 31 Cal.App.5th 640 8

Munson v. Del Taco, Inc. (Munson)
(2009) 46 Cal.4th 661 ..... 12, 14

Orloff v. Los Angeles Turf Club
(1947) 30 Cal.2d 110 14

People v. Overstreet
(1986) 42 Cal.3d 891 8

Serrano v. Unruh
(1982) 32 Cal.3d 621 16

Sullivan v. Vallejo City Unified Sch. Dist. (Sullivan)
(E.D. Cal. 1990) 731 F.Supp. 947 7

Walker v. Superior Court
(1988) 47 Cal.3d 112 13

Wells v. One2One Learning Found. (Wells)
(2006) 39 Cal.4th 1164 11

Whooley v. Tamalpais Union High Sch. Dist.
(N.D. Cal. 2019) 399 F.Supp.3d 986 8

Zuccaro v. Martinez Unified Sch. Dist.
(N.D. Cal. Sept. 27, 2016, No. 16-CV-02709-EDL)
2016 WL 10807692 8

Statutes:

Civ. Code, § 51 ..... 6, 15

Civ. Code, § 51.7 15

Civ. Code, § 51.9 15

Civ. Code, § 52 ..... *passim*

Civ. Code, § 3294 14

Ed. Code, § 200 ..... 7, 11, 13

Ed. Code, § 201 ..... 6, 7, 11

Ed. Code, § 220 6

Ed. Code, § 262.4 6

Gov. Code, § 810 11

Gov. Code, § 818 14

Gov. Code, § 998.3 11

Gov. Code, § 11135 ..... *passim*

Gov. Code, § 11136 ..... 9, 11, 12, 13

Gov. Code, § 11139 11

Gov. Code, § 12390 13

Constitutions:

Cal. Const., art. I, § 28 16

Other:

Stats. 1992, ch. 913 ..... 7, 8
Stats. 1994, ch. 710 15
Stats. 1998, ch. 914 ..... 7, 9, 10, 11
Stats. 2015, ch. 690 8
Stats. 2016, ch. 870 11

Petitioner's Answer to Amici Curiae Briefs

Everyone agrees Brennon has a cause of action under Part 1, Chapter 2 of Education Code, sections 200–262.4. The question is may Brennon and other victims of disability discrimination in public schools recover the remedies of Civil Code section 52, subdivision (a)–statutory remedies for violations of Civil Code section 51? The answer must be an unequivocal "yes."

The statutes are clear. Government Code section 11135 imposes the Americans With Disability Act on public agencies including schools. A violation of the ADA is a violation of the Unruh Act. (Civ. Code, § 51, subd. (f).) The Education Code likewise provides for a civil action to redress disability discrimination in public schools (among other forms of discrimination). (Ed. Code, § 262.4.) And Education Code section 201, subdivision (g) ties the ADA, the Unruh Act and a host of other anti-discrimination statutes into the Education Code by providing "the remedies provided herein [Title 1, Ch. 2, Educ. Code] shall not be the exclusive remedies, but *may be combined with remedies that may be provided by the above statutes*."[1] Civil Code section 52, subdivision (a) provides remedies for violations of the Unruh Act that include attorney fees and statutory penalties of at least $4,000, in addition to actual damages.

[1] Amicus Schools Ins. Auth. argues that this language is merely an "interpretive aid" citing *Donovan v. Poway Unif. Sch. Dist.* (2008) 167 Cal.App.4th 567, 591. But *Donovan* was dealing with gender discrimination and Education Code section 220 and the court had no occasion to consider the "combined with remedies" language of section 201, subdivision (g).

The contrary position of the District and its amici reads this remedies language right out of the statute. As did the Court of Appeal, the District and its amici fail recognize that AB 1077 was about *disability* discrimination, not about all forms discrimination in general. With subdivision (f), Government Code section 11135, Education Code sections 200 and 201, the Legislature's commitment to providing remedies to victims of disability discrimination everywhere, including in public schools, could not be clearer.

I. Brennon's amici confirm the Legislature's long-standing intent to provide victims of disability discrimination with the broadest remedies possible.

A. The Legislature has had thirty years to address the judicial interpretation of the Act and has not changed it.

Whether or not the Legislature was considering disability discrimination when it first adopted the Unruh Act, its 1992, A.B. 1077 (Stats. 1992, ch. 913), and its 1998, A.B. 499 (Stats. 1998, ch. 914) legislative action confirm its intention to afford disability-discrimination victims in public schools powerful remedies including attorney fees and statutory penalties.

As amicus Disability Rights Education and Defense Fund points out, the seminal federal decision applying the Act to a public school district, *Sullivan v. Vallejo City Unified Sch. Dist.* (E.D. Cal. 1990) 731 F.Supp. 947 *(Sullivan)* had been decided for two years when AB 1077 came before the Legislature. The

California Attorney General had participated in the case on the side of the plaintiffs and found the school district's contrary argument "shocking." (DREF Br. 31–33.)

Before the Court of Appeal opinion here, only a single federal magistrate, in an unpublished opinion, had declined to follow *Sullivan*. (*Zuccaro v. Martinez Unified Sch. Dist.* (N.D. Cal. Sept. 27, 2016, No. 16-CV-02709-EDL) 2016 WL 10807692, at *10.) That analysis was later rejected as "readily distinguishable" by yet another federal court. (*Whooley v. Tamalpais Union High Sch. Dist.* (N.D. Cal. 2019) 399 F.Supp.3d 986, 998.) At least one California appellate court has simply assumed the Act applied to the California State University. (*Mackey v. Bd. of Trs. of Cal. State Univ.* (2019) 31 Cal.App.5th 640.)

"[T]he Legislature is deemed to be aware of existing laws and judicial decisions in effect at the time legislation is enacted and to have enacted and amended statutes 'in the light of such decisions as have a direct bearing upon them.' [Citations.]" (*People v. Overstreet* (1986) 42 Cal.3d 891, 897.) The Legislature has had thirty years in which to address the nigh-unbroken string of federal cases holding the Act applies to public schools. Instead, it has "doubled down" first with AB 1077 and then, as applied directly to pubic schools, with AB 499 as pertains to disability discrimination. In 2015, legislation passed, in a different discriminatory context, reciting that Unruh Act applies to public schools. (Stats. 2015, ch. 690, § 1, subd. (f).)

The stated purpose of AB 1077 was to make California's disability-discrimination laws the toughest in the country - at least as tough or tougher than the federal ADA. (Stats. 1992, ch. 913, § 1.) The stated purpose of AB 499 was to address "an urgent

need to prevent and respond to acts of hate violence and bias-related incidents that are occurring at an increasing rate in California's public schools." (Stats. 1998, ch. 914, § 5, subd. (d)) and "to prohibit acts which are contrary to that policy and *to provide remedies* therefor." (*Id.* at § 7.) Those remedies included those found the Education Code and elsewhere, including the Unruh Act. (*Id.* at § 5, subd. (g).)

B. The public agency and public school interpretation of the Act is consistent with Brennon's interpretation. It applies to public schools.

Amicus American Civil Liberties Union points out that as recently 2017, the Attorney General issued an interpretive document supporting the application of the Act to public schools. (ACLU Br. 33.) The Fair Employment and Housing Commission has applied the Act to the University of California. (*Id.* at pp. 33–34 citing *Dept. of Fair Emp.'t & Hous. v. Univ. of Calif. Berkeley* (Cal.F.E.H.C. Nov. 18, 1993) 1993 WL 726830.) The Legislature has charged the Department of Fair Employment and Housing with enforcing the Act against local public agencies that violate it. (Gov. Code, § 11136.) Public school districts, responding to legislative directives, have promulgated guidelines and policies acknowledging the application of the Act to them. (ACLU Br. 35–36 and fns. 3, 4.)

C. Section 51 subdivision (f) may stand alone from the rest of the Act.

Amicus Consumer Attorneys of California urges the Court to view subdivision (f) as a stand-alone portion of the Act, untethered to the "business establishment" language of subdivision (b). (CAOC Br. 20–21.) The argument makes sense because subdivision (f) was added "stand-alone" as part of AB 1077. (Stats. 1992, ch. 914, § 3.) Civil Code section 52, subdivision (a) imposes liability for damages, penalties and attorney fees on "[w]hoever denies, aids or incites a denial, or makes any discrimination or distinction contrary to Section 51." Subdivision (f) makes a violation of the ADA "discrimination or distinction contrary to Section 51." CAOC's interpretation is consistent with the Legislature's purpose "to strengthen California law in areas where it is weaker than the Americans with Disabilities Act of 1990 (Public Law 101–336) and to retain California law when it provides more protection for individuals with disabilities than the Americans with Disabilities Act of 1990."

II. The "too costly to schools" arguments of the District's amici cannot bear the weight of the contrary legislative enactments and policy statements.

The Education Legal Alliance of the California School Boards and the Schools Insurance Authority argue section 52, subdivision (a)'s penalty ought not to apply to public schools because of the "severely underfunded" status of public schools who exist by constitutional mandate. (ELA Br. 18, SIA Br. 19.)

But they acknowledge, as they must, "the state retains plenary power over public education . . . one of the state's most sovereign powers." (*Wells v. One2One Learning Found.* (2006) 39 Cal.4th 1164, 1195 *(Wells)*.) This means the Legislature remains free to waive the state's sovereign immunity and impose liability on public agencies notwithstanding the public education mandates. Amici do not point to any constitutional or statutory provision that *bars* the Legislature from imposing on public school the financial responsibility for disability discrimination. The Legislature's declared intent, written into the statutes themselves, is to stamp out disability discrimination and to impose stern penalties on those persons, public or private, who discriminate. (Stats. 1992, ch. 914, § 1, Ed. Code, §§ 200, 201.)

ELA's extended argument about Government Code section 11135 as the exclusive authority for public entity liability makes no sense. AB 1077, the same legislation that added section 51, subdivision (f) (Stats. 1992, ch. 914, §§ 3, 18), amended section 11135 to apply Title II of the ADA to public agencies. Section 11135 is not self-executing. Direct relief is by way of loss of state funding or by an injunction. (§ 11136, § 11139.) It is not part of the Government Claims Act, Government Code sections 810–998.3.

Section 11135 finds some of its teeth in section 11136. As amended in 2016,[2] section 11136 provides for loss-of-funding penalties to local public agencies who violate the Act.

> Whenever a state agency that administers a program or activity that is funded directly by the state or

[2] Stats. 2016, ch. 870, § 4.

> receives any financial assistance from the state has reasonable cause to believe that a contractor, grantee, or *local agency* has violated the provisions of Section 11135, Part 2.8 (commencing with Section 12900) of this code, *Section 51*, 51.5, 51.7, 54, 54.1, or 54.2 *of the Civil Code*, or any regulation adopted to implement these sections or Article 1 (commencing with Section 12960) of Chapter 7 of this code, the head of the state agency, or his or her designee, shall notify the contractor, grantee, or *local agency* of such violation and shall submit a complaint detailing the alleged violations to the Department of Fair Employment and Housing for investigation and determination pursuant to Article 1 (commencing with Section 12960) of Chapter 7 of this code. (Emphasis added.)

Section 11136 evinces the Legislature's intention that the Act apply to public agencies.

The Court has recognized the Legislature's intention to treat ADA-defined disability discrimination differently from other forms of discrimination proscribed by the Act.

> The Legislature's intent in adding subdivision (f) was to provide disabled Californians injured by violations of the ADA with the remedies provided by section 52. A plaintiff who establishes a violation of the ADA, therefore, need not prove intentional discrimination in order to obtain damages under section 52.

(*Munson v. Del Taco, Inc.* (2009) 46 Cal.4th 661, 665 *(Munson)*.)

Although *Munson* arose in the context of a ADA Title III violation by a private business, the Court's conclusion was spot-on as to all ADA violations. Government Code section 11135 makes the ADA applicable to public entities. As one court noted

recently addressing section 11135 and 11136, "[t]hese code sections are not only interrelated but are tied to other laws." (*Collins v. Thurmond* (2019) 41 Cal.App.5th 879, 903 (noting the interplay between Gov. Code, §§ 11135–11139, 12390 and Ed. Code, § 200.)

The statutes amended or added by AB 1077 and AB 499 are *in pari materia* , "of the same matter" or "on the same matter." (*Altaville Drug Store, Inc. v. Emp.'t Dev. Dep't* (1988) 44 Cal.3d 231, 236, fn. 4.) As such, they must be interpreted together. (*Walker v. Superior Court* (1988) 47 Cal.3d 112, 124, fn. 4.)

> [A] statute is not to be read in isolation; it must be construed with related statutes and considered in the context of the statutory framework as a whole. [Citation.] A court must determine whether the literal meaning of a statute comports with its purpose or whether such a construction of one provision is consistent with other related provisions.

(*Hicks v. E.T. Legg & Assocs.* (2001) 89 Cal.App.4th 496, 505.)

By cross-referencing the Act with the Education Code, the Government Code and the ADA, Legislature manifest its intentions to provide victims of disability discrimination with robust, enhanced remedies in all walks of life, including in public schools.

III. Section 52, subdivision (a)'s penalties are not "punitive damages" within the meaning of Government Code section 818.

Amicus Schools Insurance Authority argues the provision in for penalty damages[3] amounts to punitive damages and cannot be recovered from a public entity under Government Code section 818. It attempts to distinguish *Kiser v. Cnty. of San Mateo* (1991) 53 Cal.3d 139. And it makes a wrong-headed argument that the provision for punitive damages in section 52, subdivision (b), means the provisions in subdivision (a) are punitive damages.

The Insurance Authority's argument fails to account for the fact that the Court has deemed violations of the Unruh Act and its predecessors "per se injurious." (*Koire v. Metro Car Wash* (1985) 40 Cal.3d 24, 33.) Interpreting the 1923 version of sections 51–54,[4] the Court characterized the "additional" damages recoverable (then $100) as "unquestionably a penalty which the law imposes." (*Orloff v. Los Angeles Turf Club* (1947) 30 Cal.2d 110, 115.) They are recoverable without proof of intentional misconduct. (*Ibid.*, accord *Munson*, *supra*, 46 Cal.4th at p. 665.) Intentional misconduct is the *sine qua non* of punitive damages. (Civ. Code, § 3294.)

---

[3] "[U]p to a maximum of three times the amount of actual damage but in no case less than four thousand dollars ($4,000)."

[4] "Any person who is refused admission to any place of amusement contrary to the provisions of the last preceding section, is entitled to recover from the proprietor, lessee, or their agents, or from any such person, corporation, or association, or the directors thereof, his actual damages, and one hundred dollars in addition thereto." (Former Civ.Code § 54.)

Insurance Authority's argument that subdivision (b)'s express provisions for punitive damages renders subdivision (a)'s provision for additional damages "up to a maximum of three times the amount of actual damage but in no case less than four thousand dollars ($4,000)" also punitive damages simply makes no sense. Subdivision (b) refers to Civil Code section 51.7 and 51.9, which are not part of the Unruh Act. Section 51.7 is "part of the Ralph Civil Rights Act of 1976, in Chapter 1293 of the Statutes of 1976." (§ 51.7, subd. (e).) Section 51.9 (addressing gender discrimination) was not enacted until 1994 and expressly references section 52, subdivision (b). (Civ. Code, § 51.9, subd. (b), Stats.1994, ch. 710, § 2.)

Moreover, the incorporation of the ADA into the Unruh Act is found in section 51 (f). Section 52, subdivision (a) applies to "[w]hoever denies, aids or incites a denial, or makes any discrimination or distinction contrary to Section 51 . . . ." If the Legislature wanted to make punitive damages available to a victim of section 51 discrimination, it would have done so. Instead it created a remedy of actual damages, minimum penalty damages and attorney fees.

CONCLUSION

The Legislature's 30-year, disability-discrimination oeuvre leaves little question that it intended and has continued to intend California have the strongest anti-discrimination laws in the country. Disability discrimination is pernicious. Its victims, such as Brennon, are the least able to protect themselves.

Implicit in statutes providing for awards of attorney fees in cases that vindicate important rights affecting the public interest "is the recognition that without some mechanism authorizing the award of attorney fees, private actions to enforce important public policies will as a practical matter frequently be infeasible.'"[5] Those important public policies affected here include the state's overarching policy against discrimination in any form[6] and the "fundamental public policy favoring measures to ensure the safety of California's public school students."[7]

---

[5] *Serrano v. Unruh* (1982) 32 Cal.3d 621, 632.

[6] E.g, "Discrimination on the basis of race or color is contrary to the public policy of the United States and of this state. Although the antidiscrimination provisions of the federal Constitution relate to state rather than private action, they nevertheless evidence a definite national policy against discrimination." (*Burks v. Poppy Const. Co.* (1962) 57 Cal.2d 463, 471.

[7] *C.A. v. William S. Hart Union High Sch. Dist.* (2012) 53 Cal.4th 861, 870 fn. 3, citing Cal. Const., art. I, § 28, (a)(7).

Little wonder that the Legislature made a violation of the ADA a violation of the Act, that it made ADA Title II applicable to all public agencies and then amended the Education Code to eliminate any doubt of the Act applicability to public schools. The only reasonable interpretation of the Act, AB 1077 and AB 499 is that the Civil Code section 52, subdivision (a)'s remedies are available to victims of disability discrimination in public schools. The Court should so hold.

Respectfully submitted,

Dated: November 15, 2021 By: /s/ Alan Charles Dell'Ario

Attorney for Petitioner
Brennon B.

CERTIFICATE OF COMPLIANCE

This brief is set using **13-pt Century Schoolbook**. According to TypeLaw.com, the computer program used to prepare this brief, this brief contains **2,648** words, excluding the cover, tables, signature block, and this certificate.

The undersigned certifies that this brief complies with the form requirements set by California Rules of Court, rule 8.204(b) and contains fewer words than permitted by rule 8.520(c) or by Order of this Court.

Dated: November 15, 2021 By: /s/ Alan Charles Dell'Ario

PROOF OF SERVICE

I declare:

At the time of service I was at least 18 years of age and not a party to this legal action. My business address is PO BOX 359, Napa, CA 94559-0359, Napa, CA 94559-0359. I served document(s) described as Answer to Amicus Curiae Brief as follows:

By U.S. Mail

On November 15, 2021, I enclosed a copy of the document(s) identified above in an envelope and deposited the sealed envelope(s) with the US Postal Service with the postage fully prepaid, addressed as follows:

Contra Costa County County Superior Court
1020 Ward Street
Martinez, CA, 94553
(for Hon. Charles Treat)

Solicitor General of California
1515 Clay St.
Oakland, CA 94612
(for Attorney General of California)

I am a resident of or employed in the county where the mailing occurred (Napa, CA).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: November 15, 2021 By: /s/ Alan Charles Dell'Ario

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **B. (BRENNON) v. S.C. (WEST CONTRA COSTA UNIFIED SCHOOL DISTRICT)**
Case Number: **S266254**
Lower Court Case Number: **A157026**

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. My email address used to e-serve: **charles@dellario.org**

3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
BRIEF	S266254_AAC_BrennonB (1)

Service Recipients:

Person Served	Email Address	Type	Date / Time
Douglas Collodel Clyde & Co US LLP 112797	douglas.collodel@clydeco.us	e-Serve	11/15/2021 6:28:42 PM
Sharon Arkin The Arkin Law Firm 154858	sarkin@arkinlawfirm.com	e-Serve	11/15/2021 6:28:42 PM
Linda Kilb Disability Rights Education & Defense Fund 136101	lkilb@dredf.org	e-Serve	11/15/2021 6:28:42 PM
Melissa Deleon ACLU Foundation of San Diego & Imperial	mdeleon@aclusandiego.org	e-Serve	11/15/2021 6:28:42 PM
Angelo McCabe Clyde & Co US LLP	angelo.mccabe@clydeco.us	e-Serve	11/15/2021 6:28:42 PM
Brandon Greene American Civil Liberties Union Foundation of Northern California 293783	bgreene@aclunc.org	e-Serve	11/15/2021 6:28:42 PM
Micha Liberty Liberty Law Office	micha@libertylaw.com	e-Serve	11/15/2021 6:28:42 PM
Claudia Center Disability Rights Education & Defense Fund 158255	ccenter@dredf.org	e-Serve	11/15/2021 6:28:42 PM
Madison Simmons Matheny Sears Linkert & Jaime 292185	msimmons@mathenysears.com	e-Serve	11/15/2021 6:28:42 PM

Camille Banks Dannis Woliver Kelley	cbanks@dwkesq.com	e-Serve	11/15/2021 6:28:42 PM
David Nahmias Impact Fund 324097	dnahmias@impactfund.org	e-Serve	11/15/2021 6:28:42 PM
Ana Najera Mendoza ACLU Foundation of Southern California 301598	AMendoza@aclusocal.org	e-Serve	11/15/2021 6:28:42 PM
Ila Friend Dannis Woliver Kelley	ifriend@dwkesq.com	e-Serve	11/15/2021 6:28:42 PM
Frank Nunes Law Offices of Frank M. Nunes, Inc.	info@nuneslaw.com	e-Serve	11/15/2021 6:28:42 PM
Jinny Kim Legal Aid at Work 208953	jkim@legalaidatwork.org	e-Serve	11/15/2021 6:28:42 PM
Sue Evans Dannis Woliver Kelley	sevans@mdblaw.com	e-Serve	11/15/2021 6:28:42 PM
William Ash Dannis Woliver Kelley 324122	wash@dwkesq.com	e-Serve	11/15/2021 6:28:42 PM
Cody Lee Saal Edrington, Schirmer & Murphy LLP 286041	Csaal@esmlawfirm.com	e-Serve	11/15/2021 6:28:42 PM
David Obrand Dannis Woliver Kelley 293657	dobrand@dwkesq.com	e-Serve	11/15/2021 6:28:42 PM
Marelyn Garcia ACLU of Southern California	mgarcia@aclusocal.org	e-Serve	11/15/2021 6:28:42 PM
Keith Bray California School Baords Association	kbray@csba.org	e-Serve	11/15/2021 6:28:42 PM
Shanti Friend Dannis Woliver Kelley	sfriend@dwkesq.com	e-Serve	11/15/2021 6:28:42 PM
Sue Ann Evans Dannis Woliver Kelley 151562	sevans@dwkesq.com	e-Serve	11/15/2021 6:28:42 PM
Alan Dell'ario Attorney at Law 60955	charles@dellario.org	e-Serve	11/15/2021 6:28:42 PM
Alison Beanum Clyde & Co US LLP	alison.beanum@clydeco.us	e-Serve	11/15/2021 6:28:42 PM
Susan Henderson Disability Rights Education & Defense Fund	shenderson@dredf.org	e-Serve	11/15/2021 6:28:42 PM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

11/15/2021

Date

/s/Alan Charles Dell'Ario

Signature

Dell'Ario, Alan Charles (60955)

Last Name, First Name (PNum)

Law Offices of A. Charles Dell'Ario

Law Firm