No. S279242

In the Supreme Court of the State of California

MAKE UC A GOOD NEIGHBOR,
Petitioners and Appellants,

v.

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA et al.,
Respondents,

RESOURCES FOR COMMUNITY DEVELOPMENT,
Real Party in Interest,

After a published opinion of the Court of Appeal First Appellate District, Division Five, Case No. A165451

Appeal from July 29, 2022, Order and August 2, 2022 Order and Judgment of the Alameda Superior Court; Hon. Frank Roesch, Dept. 17, Case No. RG21110142 (Consolidated for Purposes of Trial Only with Case Nos. RG21109910, RG21110157, 21CV000995 and 21CV001919)

APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF THE TWO HUNDRED FOR OWNERSHIP IN SUPPORT OF RESPONDENTS THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, ET AL; AMICUS CURIAE BRIEF OF THE TWO HUNDRED FOR OWNERSHIP

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APPLICATION

Pursuant to Rule 8.520(f)(1) of the California Rules of Court, proposed *Amicus Curiae* The Two Hundred for Homeownership respectfully requests permission from the Chief Justice to file a single *amicus curiae* brief in support of Defendants and Appellants The Regents of the University of California, *et al.* Pursuant to Rule 8.520(f)(5) of the California Rules of Court, the proposed *amicus curiae* brief is combined with this Application. By order of this Court, dated September 13, 2023, the deadline for filing an *amicus curiae* application and brief is October 16, 2023. Accordingly, under Rule 8.520(f)(2), this application and brief are timely.

1. Background and Interest of The Two Hundred for Homeownership

The Two Hundred and the Two Hundred for Homeownership (collectively "The 200") is a statewide nonprofit coalition of founders of civil rights organizations, community and business leaders, housing advocates, former state legislators, and cabinet members. The 200 advocates to mitigate the increase in poverty and the growing wealth gap in California through homeownership and home building. The 200 is passionate about addressing the shortage of affordable housing in California, which is attributed to the high costs of production and ownership caused by state regulations. As such, The 200 has a strong interest in the Supreme Court's decision in this case, which has the potential to not only dramatically affect the expense and time

required to entitle and construct desperately needed new housing in the City of Berkeley, but also result in severe, statewide anti-housing consequences and disparate harms to minority communities.

2. How the Proposed *Amicus Curiae* Brief Will Assist the Court

The 200 seeks to provide important legal and factual background on the lack of precedent for adding social noise impacts to CEQA, the result of which is to fundamentally change CEQA compliance obligations for housing projects in existing communities. The proposed *amicus curiae* brief will provide the appropriate statutory rules of construction and legal contexts through which the Supreme Court should reject the Fifth District Court of Appeal's creation of a new CEQA impact. With this background, The 200 also seeks to provide points and authorities for the Court's consideration, demonstrating that the addition of social noise impacts to CEQA impedes the needed construction of new housing in California and provides incumbent neighbors with an objection that welcomes the consideration of unfounded stereotypes of various groups of people.

3. Rule 8.520 Disclosure

In accordance with Rule 8.520(f)(4) of the California Rules of Court, The 200 hereby certifies that no party to this case, and no counsel for any party to this case, authored this brief, in whole or in part. Neither did any

party to this case or any counsel to any party to this case make any monetary contribution towards or in support of the preparation of this brief.

CONCLUSION

On behalf of The 200, we respectfully request that this Court accept the filing of the attached brief.

Dated: October 12, 2023

Respectfully submitted,

HOLLAND & KNIGHT LLP

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Attorneys for The Two Hundred for Ownership

AMICUS CURIAE BRIEF

I. INTRODUCTION

Respondents The Regents of the University of California, *et al.* ("Respondents") ask this Court to reverse the Fifth Circuit Court of Appeal's decision (the "Opinion") to uphold the judicial creation of a new environmental impact under the California Environmental Quality Act ("CEQA"),[1] requiring the Respondents to assess the potential noise impacts from loud student parties in residential neighborhoods near the Berkeley campus of the University of California ("UC Berkeley").

Robert Apodaca, co-founder of The 200, was among the first wave of Chicanos admitted to transfer to UC Berkeley in 1969 as part of the sweeping civil rights legal reforms enacted in the wake of President Kennedy's assassination. This move allowed Mr. Apodaca to complete his college education while also serving as a UC Berkeley Chicano civil rights leader. Even then, affordable student housing was an acute unmet need. Mr. Apodaca and his activist colleagues worked to raise funds for the establishment of Casa Joaquin Murrieta, a 40-bed Latino student residential cooperative located near campus that remains in operation today. Thankfully, Casa Joaquin Murrieta was established prior to the enactment of CEQA and was thus spared CEQA's "never-ending battle of attrition with ever-changing

[1] CEQA is codified at Public resources Code section 21000 et seq. Further statutory references are to the Public Resources Code unless otherwise indicated.

targets for project opponents to aim for." Center for Biological Diversity v. Dept. of Fish & Wildlife (2015) 62 Cal.4th 204, 245 (dis. opn. Of Chin, J). Casa Joaquin Murrieta may have never existed were it made subject to neighborhood opposition that targets the social noise of Chicano student activists.

The judicial expansion of CEQA to require a lead agency to predict the behaviors of a specific human demographic and evaluate environmental impacts associated with those behaviors, such as social noise generated by partying college students, is emblematic of the regulatory uncertainty caused by judicial disregard for the CEQA's express mandate that courts refrain from interpreting CEQA in a manner which imposes procedural or substantive requirements beyond those explicitly stated in the CEQA statute and its implementing regulations commonly referred to as the "CEQA Guidelines."[2] Pub. Res. Code § 21083.1.

The Court of Appeal's Opinion drastically alters the threshold of compliance for projects under CEQA and opens the courthouse door for incumbent neighbors and project opponents resistant to a proposed project by requiring an assessment of impacts based on perceived demographic and behavioral stereotypes, even with respect to projects that would provide

[2] The CEQA Guidelines, promulgated by the Secretary of the Natural Resource Agency, are set forth at Cal. Code Regs., tit. 14, § 15000 et seq. They are cited herein as "Guidelines § ____."

important social benefits, like needed housing in existing communities. Where CEQA compliance obligations are already confusing and troublesome under existing conditions, the addition of a new CEQA impact for which there are no recognized scientific methodologies of measurement will arrive with added uncertainty and exaggerated judicial interpretation, rendering the new CEQA impact endlessly litigable.

The addition of a "social noise" impact under CEQA is an impermissible expansion of CEQA based on statutory rules of construction. Prior to the case at hand, no court had required a CEQA document to evaluate the social noise of college students or the impacts potentially caused by any other specific demographic, as recognized in the legislative history of Assembly Bill No. 1307 (2023-2024 Reg. Sess.) ("AB 1307"), a bill enacted on an urgency basis in response to the Opinion. (Respondent's Second Motion for Judicial Notice ("MJN") 44 [Sen. Com. on Housing, Analysis of AB 1307 as amended June 26, 2023 (The Opinion "establishes a new precedent that noise from residents in projects should be an environmental factor under CEQA"].) The addition of a "social noise" impact is deeply inconsistent with CEQA's statutory scheme, the plain language rule, agency interpretation of CEQA, and constitutional protections.

For these reasons, this Court should reverse the Court of Appeal's judgment.

II. STATEMENT OF FACTS AND PROCEDURAL HISTORY

Amicus incorporates by reference herein the Factual and Procedural Statement of the Case contained at pages 15-25 of Respondents' Opening Brief on the Merits ("Open. Br.").

III. CEQA IS A STATUTE, AND THE STATUTORY RULES OF CONSTRUCTION SHOULD BE APPLIED

The Opinion begins its analysis with a quoted passage from this Court's 1988 CEQA decision Laurel Heights Improvement Ass'n. v. Regents of the University of California (1988) 47 Cal.3d 376, 390 ("Laurel Heights"), which was itself based on this Court's first CEQA decision, Friends of Mammoth v. Board of Supervisors (1972) 8 Cal.3d 247, 259 ("Mammoth"), which held that CEQA is to be "interpreted . . . to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." Opinion, 88 Cal.App.5th at 667. The Opinion, however, fails to acknowledge Section 20183.1 of the CEQA statute, a critical statutory amendment enacted after the Mammoth and Laurel Heights decisions.

Section 21083.1 provides as follows:

> It is the intent of the Legislature that courts, consistent with generally accepted rules of statutory interpretation, shall not interpret this division or the state guidelines adopted pursuant to Section 21083 in a manner which imposes procedural or substantive requirements beyond those explicitly stated in this division or in the state guidelines. (Ch. 1070, Statutes of 1993, emphasis added.)

"[T]he purpose of this statute was to limit judicial expansion of CEQA requirements and to reduce the uncertainty and litigation risks facing local

governments and project applications by providing a safe harbor to local entities and developers who comply with the explicit requirements of the law." Berkeley Hillside Preservation v. City of Berkeley (2015) 60 Cal.4th 1086, 1107 (internal citations and quotations omitted).

In none of the tens of thousands of CEQA lawsuits filed in the 50 years since Mammoth was decided has any court concluded that the "the reasonable scope of the statutory language" of CEQA encompasses the analysis of demographically specific impacts caused by project users while they engage in social behavior beyond the project boundary, such as social noise caused by college students.

A Plain Language Rule.

When interpreting CEQA, a reviewing court's "fundamental task" is to "determine the Legislature's intent" by "examin[ing] the statutory language, giving it a plain and commonsense meaning." Sierra Club v. Superior Court (2013) 57 Cal.4th 157, 165; *see*, *also*, Ailanto Props., Inc. v. City of Half Moon Bay (2006) 142 Cal.App.4th 572, 582-83. Given Section 21083.1's mandate that courts not "impose" any "substantive requirements beyond those explicitly stated," we respectfully suggest that the statute provides "plain language" indicating that the Legislature did not intend for the court to expand CEQA to cover impacts potentially caused by the stereotypical behaviors of a specific demographic of project users (much less demographically specific impacts caused while project users are engaging in

activities beyond the project site, such as college students attending offsite parties).

In Mammoth and Laurel Heights, the Court was interpreting an earlier-enacted form of CEQA that predated Section 21083.1. Notably, neither in 1993 nor thereafter did the Legislature codify Mammoth's or Laurel Heights' expansive "fullest possible protection to the environment" language. To the contrary, it affirmatively restricted judicial expansion of CEQA through enactment of Section 21083.1. A later-enacted statute is given more weight than an earlier enacted statute. See, e.g., People v. Adelmann (2018) 4 Cal.5th 1071, 1079; Lopez v. Sony Elecs., Inc. (2018) 5 Cal.5th 627, 634-635; Coca Cola Bottling Co. v. Feliciano (1939) 32 Cal.App.2d 351, 354. Section 20183.1 now controls.

B Deference to Expert Administrative Agency Interpretation

The Office of Planning and Research ("OPR") is charged under CEQA with promulgating "guidelines" interpreting CEQA; courts have held that the CEQA Guidelines have the force and effect of regulations and are in fact required to be adopted as regulations. See, Pub. Res. Code § 21083; Union of Medical Marijuana Patients, Inc. v. City of San Diego (2019) 7 Cal.5th 1171, 1184 ("CEQA is implemented by an extensive series of

administrative regulations promulgated by the Secretary of the Natural Resources Agency, ordinarily referred to as the 'CEQA Guidelines.'").

The CEQA Guidelines underwent a comprehensive revision in 2018, which among other features addressed noise impacts. CEQA Guidelines Appendix G, Section XIII.a, notes that "[g]eneration of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinances, or applicable standards of other agencies," could result in a significant adverse noise impact under CEQA.

The CEQA Guidelines did not, however, make a shouting college student, basketball-dribbling sidewalk child, or a church's gospel choir a significant CEQA noise impact, and it certainly did not require analysis of noise generated not by the project, but by its users going about their daily activities beyond the project site boundaries. Social noise - if excessive - violates local noise ordinances in public and is a law enforcement issue, not a CEQA impact issue. We respectfully request that this Court overturn the lower court in deference to expert agency OPR, which has declined to elevate social noise to the status of a CEQA impact.

C Consistency with Other Statutes, and with Constitutional Protections

Civil rights are protected by the federal and State Constitution. Housing - including higher density housing near incumbent residential

opponents - is required by state laws like the Regional Housing Needs Assessment ("RHNA") law, Government Code §§ 65583, 65584, and the Affirmatively Furthering Fair Housing law, Government Code § 8899.50 *et seq*. And access to public higher education is not just legally required (Ed. Code § 66202.5), but a sacred mission of the University of California that has successfully elevated hundreds of thousands of first-generation college students of all races.

Statutes should be construed to avoid questionable constitutional outcomes, such as differentially assessing the demographics of planned new housing and then speculating as to environmental impacts attributable to the behaviors of different ages, races, or socioeconomic segments of the general population. See, e.g., People v. Gutierrez (2014) 58 Cal.4th 1354, 1373.

Statutes should also be construed to harmonize, rather than conflict with, other statutes. See, e.g., In Re C.B. (2016) 2 Cal.App.5th 1112, 1121 (citing Taxpayers to Limit Campaign Spending v. Fair Political Practices Commission (1990) 51 Cal.3d 744, 764). The statutory deadlines for adopting a housing element in accordance with applicable law are enforceable, and an immediately applicable expansion of CEQA to social noise would render all prior CEQA documentation prepared for the millions of new housing units required by RHNA vulnerable to new CEQA lawsuit claims - claims which are more likely to be aimed by those with greater wealth against those in need of new housing. Harmonizing CEQA with

housing statutes requiring development of many thousand new homes in Berkeley and Oakland, and more than half a million new homes in the surrounding Bay Area, to be distributed in cities like Berkeley that have housing shortages, housing unaffordability, and homelessness challenges precludes expanding CEQA by judicial decree to encompass social noise from new housing occupants.

IV. JUDICIAL CREATION OF A NEW CEQA IMPACT IN A PRIVATE PARTY LAWSUIT DEPRIVES CIVIL RIGHTS, CLIMATE AND EQUITY ADVOCATES OF THE RIGHT TO PARTICIPATE IN AN ORDERLY LEGISLATIVE OR RULEMAKING POLICY PROCEEDING AND PROMOTES LITIGATION THAT IS LIKELY TO TARGET MARGINALIZED COMMUNITIES.

The judicial creation of a demographically specific CEQA impact, such as social noise generated by college students, has a far more immediate consequence than new CEQA legislation or regulations. After all, the judicial creation of a new impact is an immediately effective CEQA requirement rather than simply prospectively effective, as would be the case for new CEQA legislation, or effective only for new CEQA documents as would be the case for adoption of a new CEQA "guideline" (ne regulation). CEQA Guidelines § 15007(b); *see*, *also*, Laurel Heights Improvement Assn. v. Regents of Univ. of Cal. (1993) 6 Cal.4th 1112, 1126, fn. 10 ("[C]hanges to the [CEQA] Guidelines act prospectively only"). As such, there has been no rulemaking, public review or stakeholder engagement process to consider in a public forum the analytical methodologies, significance criteria, and

feasible mitigation measures required to adequately address demographically specific CEQA impacts, such social noise impacts caused by loud college students.

For example, requiring CEQA to address a demographically specific environmental impact requires both a demographic prediction of new project users and occupants, the identification and proper application of presently unknowable new technical methodologies for evaluating the environmental effect caused by the stereotypical behavior of that demographic (*e.g.*, children hooting when playing tag or hide-and-seek, teenagers playing music in their bedrooms, and families using outdoor picnic and play areas), establishing legally adequate thresholds for determining the extent to which the demographically specific impact is "significant," and then identifying and mandating "all feasible mitigation measures" or alternatives to avoid such demographically specific impact.

By expanding CEQA to include demographically specific environmental impacts without the benefit of implementation guidance that is the frequent byproduct of the normal legislative and rulemaking processes, the Opinion injects further uncertainty into the CEQA compliance process that is likely to be leveraged by privileged communities to the detriment of underserved communities. As explained by UC Berkeley Law Professor Eric Biber in "CEQA and socioeconomic impacts: Why expanding CEQA to cover socioeconomic impacts might harm equity goals," in a comment

criticizing the First District Court of Appeal's decision in Save Berkeley's Neighborhoods v. Regents of the University of California (2020) 51 Cal.App.5th 226,

> In research I have helped work on about how CEQA and local land-use law is implemented for housing projects in California, we have found evidence that litigation and administrative appeals are more common in wealthier neighborhoods fighting projects. This suggests it is more likely that more privileged communities will use socioeconomic impact analysis challenges under CEQA to stop needed housing projects, housing that is needed to resolve the state's dire housing crisis.[3]

Professor Biber's research observation mirrors the observations of Jennifer Hernandez; in California's Environmental Quality Act Lawsuits and California's Housing Crisis, Hernandez mapped the location of the nearly 14,000 housing units challenged in a swath of Southern California to show that anti-housing CEQA lawsuits are far more common in Whiter, wealthier, and healthier neighborhoods.[4]

The future CEQA lawsuit claims invited by the Opinion include: does social noise differ based on the musical choices of teenagers of different races? Does a child audibly bouncing a basketball or playing four square on the sidewalk cause a "significant" social noise impact? Does a family celebrating a birthday at a picnic table with a rousing birthday song followed

[3] Biber, CEQA and Socioeconomic Impacts, Legal Planet, September 26, 2021, https://legal-planet.org/2021/09/26/ceqa-and-socioeconomic-impacts/ (last accessed October 11, 2023).
[4] Hernandez, California Environmental Quality Act Lawsuits and California's Housing Crisis, 24 Hastings Envtl. L.J. Vol. 25, No. 1, Winter 2018, Figures 6 & 7, https://www.hklaw.com/files/Uploads/Documents/Articles/121317_HELJ_Jennifer_Hernandez.pdf (last accessed October 11, 2023).

by clapping cause a significant "social impact" if five, or fifteen, children will have birthday parties at noon on an otherwise quiet Sunday? Creating new analytical methodologies, significance thresholds, and mitigation or avoidance obligations are unknowable, are subject to CEQA's conflicting and confusing standards of review (abuse of discretion, substantial evidence, and fair argument), and are thus nearly endlessly litigable. This is the anti-housing consequence of judicially elevating social noise to a new CEQA impact more than 50 years after CEQA was enacted.

V. THE JUDICIAL EXPANSION OF CEQA TO ADD DEMOGRAPHICALLY SPECIFIC IMPACTS TO THE LIST OF CEQA COMPLIANCE REQUIREMENTS SIGNIFICANTLY UNDERMINES OPPORTUNITIES FOR CEQA STREAMLINING.

CEQA encourages lead agencies to streamline environmental review when considering projects that are within the scope of a previously certified environmental impact report ("EIR"), such as an EIR prepared in connection with the adoption of a specific plan or a housing element that plans for a local agency's share of the regional housing need. *See*, *e.g.,* Pub. Res. Code § 21093 ("tiering" CEQA documents), 21083.3 (streamlined CEQA review for projects consistent with adopted land use plans for which an EIR was prepared), 21155.4 (CEQA exemption for transit-oriented housing projects that are consistent with a specific plan for which an EIR was prepared); *see*, *also*, Californians for Alternatives to Toxics v. Department of Food & Agriculture (2005) 136 Cal.App.4th 1, fn. 10. The Opinion's expansion of CEQA to cover demographically specific environmental effects severely undermines the effectiveness of these statutory CEQA streamlining tools.

State housing law requires each local agency to adopt, on a mandatory schedule, a qualified housing element that plans for that agency's share of the millions of required new housing units identified through the RHNA process. None of the CEQA documents for approved housing elements address the Opinion's new social noise impact. Similarly, none of the CEQA documents prepared for existing specific plans address demographically specific environmental impacts. The Opinion thereby invites CEQA lawsuits challenging new housing and other types of projects that rely on CEQA streamlining tools based on the otherwise presumptive legal adequacy of earlier CEQA studies.

VI. THE ENACTMENT OF AB 1307 CONFIRMS THE LEGISLATURE'S INTENT THAT CEQA NOT BE EXPANDED BEYOND ITS TEXT BUT IT DOES NOT RESOLVE THE ADVERSE CONSEQUENCES OF THE LOWER COURT'S HOLDING

The Legislature wasted no time in responding to the Opinion with its enactment of Assembly Bill No. 1307 (2023-2024 Reg. Sess.) (AB 1307), which the Governor signed as urgency legislation on September 7, 2023. The legislative history of AB 1307 makes clear the Legislature's understanding that the Opinion strays from the plain language of Section 21083.3 by "establish[ing] a new precedent that noise from residents in projects should be an environmental factor considered under CEQA … [that] could significantly slow down the CEQA process for residential buildings." (Respondent's Second Motion for Judicial Notice (MJN) 44 [Sen. Com. on Housing, Analysis of AB 1307 as amended June 26, 2023].)

AB 1307 adds Section 20185 to the CEQA statute, which specifies that, "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment." (MJN 12 [AB 1307, § 1, emphasis omitted].) AB 1307 thereby "reestablish[es] existing precedent that minor and intermittent noise nuisances, such as from unamplified human voices, be addressed through local nuisance ordinance and not via CEQA." (MJN 42 [Sen. Com. on Housing, Analysis AB 1307 as amended June 26, 2023].) According to the Legislature, "CEQA does not need to be [judicially] *expanded* to include noises from residents" because noise is best addressed through local nuisance ordinances. (MJN 32-33, emphasis added.)

The legislative history of AB 1307 also demonstrates the Legislature's "alarm[]" that the Opinion "sets a precedent to introduce identity-based discrimination into CEQA review" by requiring CEQA documents to "[a]ssume the behavior of residents, and the resultant impact of their behaviors on the environment, based on their identity[.]" (MJN 23.) Although AB 1307 confirms that UC Berkeley was not required to evaluate noise generated by the future occupants of the project's student housing facility, the scope of AB 1307 is unfortunately restricted to residential projects and noise impacts and thus does not neutralize the Opinion's "alarming" precedent.

Per the Opinion, whenever there is a "reasonable possibility" that *any* project's addition of a specific demographic to a community may cause *any* environmental impact associated with that demographic's stereotypical behavior, the lead agency must evaluate and mitigate that impact, whether or not there is an accepted methodology to measure the impact's significance. Opinion at 689. Thus, a lead agency considering approval of a new high school or a retirement community must evaluate a project's potential to exacerbate traffic hazards that might be caused by teenage or senior drivers whenever a project opponent can produce evidence that teenage drivers have a tendency to ignore speed limits or that driving ability declines among elderly drivers. This judicial expansion of CEQA goes well beyond the "procedural and substantive requirements … explicitly stated in [the CEQA statute]" and, consistent with Section 21083.1, should be expressly rejected by this Court despite the Legislature's enactment of AB 1307.

VII. CONCLUSION

For the reasons explained above, *amici curiae* urge this Court to reverse the Court of Appeal's judgment.

Dated: October 12, 2023

Respectfully submitted,

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CERTIFICATE OF WORD COUNT

The text of this brief consists of 3,233 words, not including tables of contents and authorities, the cover information, the signature blocks and this certificate, as counted by Microsoft Word, the computer program used to prepare this brief.

Dated: October 12, 2023

By:

Jennifer L. Hernandez

Attorneys for The Two Hundred
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PROOF OF SERVICE

Make UC a Good Neighbor et al. v. The Regents of the University of California et al.
Case No. S279242

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of ages and not a party to this action. I am employed in the County of San Francisco, State of California. My business address is 500 Mission Street, Suite 1900, San Francisco, CA 94105.

On October 13, 2023, I served true copies of the following documents described **APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF THE TWO HUNDRED FOR OWNERSHIP IN SUPPORT OF RESPONDENTS THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, ET AL; AMICUS CURIAE BRIEF OF THE TWO HUNDRED FOR OWNERSHIP** on the interested parties in this action as follows:

***SEE ATTACHED SERVICE LIST**

☒ **(BY MAIL)** I caused a true copy of each document(s) to be placed in a sealed envelope with first-class postage affixed and placed the envelope for collection. Mail is collected daily at my office and placed in a United States Postal Service collection box for pickup and delivery that same day.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that I executed this document on October 13, 2023, at San Francisco, California.

By: Reena Kaur

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STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **MAKE UC A GOOD NEIGHBOR v. REGENTS OF THE UNIVERSITY OF CALIFORNIA (RESOURCES FOR COMMUNITY DEVELOPMENT)**
Case Number: **S279242**
Lower Court Case Number: **A165451**

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

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

10/13/2023

Date

/s/Reena Kaur

Signature

Kaur, Reena (Other)

Last Name, First Name (PNum)

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