

**Supreme Court No. S255839**

**IN THE SUPREME COURT OF THE STATE OF CALIFORNIA**

<i>In re Caden C.,</i>	)	
A Person Coming Under the	)	Court of Appeal Nos
Juvenile Court Law.	)	A153925, A154042
	)	
_____	)	
	)	(San Francisco County
SAN FRANCISCO	)	Super. Ct. No. JD15-3034)
HUMAN SERVICES AGENCY,	)	
Petitioner and Respondent,	)	
	)	
vs.	)	
Christine C., et al.	)	
	)	
CADEN C.,	)	
Appellant.	)	
_____	)	

On Appeal from the Superior Court of San Francisco City and County,  
Sitting as a Juvenile Court  
Honorable Monica Wiley, Judge, Presiding

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**MINOR’S ANSWER TO PETITIONS FOR REVIEW**

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## ANSWER

Caden, the subject minor in this juvenile dependency matter, opposes further review and respectfully asks the Court not to grant the petitions for review filed by his parents, Christine C. (“Mother”) and Brian C. (“Father”). Their petitions being essentially identical, and Father having joined in all of Mother’s assertions, Caden files a single Answer.

1. *Review is not necessary to secure uniformity of decision or to settle an important question of law, so review should not be granted.*

Petitioners assert this case presents issues concerning “fundamental constitutional rights,” but nowhere do they explain what constitutional law questions are raised by the Court of Appeal’s decision. (Father’s Petition for Review, p. 7; Mother’s Petition for Review, p. 7.) The Court of Appeal’s opinion decided questions that were entirely statutory; the legal analysis portion of the opinion nowhere references constitutional law issues. (Opinion, pp. 21-32.)<sup>1</sup> Indeed, Mother acknowledges that the Court of Appeal decided a “statutory interpretation issue.” (Mother’s Petition for Review, p. 14.)

Mother also argues that review should be granted because the case presents “interesting and important issues.” (Mother’s Petition for Review, p. 5.) Petitioners do not explain why the appellate court’s decision was important or in what respect it raises some issue that needs to be “settled” by the Supreme Court. (Father’s Petition for Review, p. 7; Mother’s Petition for Review, p. 5.) That a case might be “interesting” is not grounds for review.

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<sup>1</sup> The “Opinion” cited in this Answer is the slip opinion attached as Appendix A to the petitions for review.

The Supreme Court may grant review when review is “necessary to secure uniformity of decision or to settle an important question of law;...” (Cal. Rules of Court, rule 8.500(b)(1).) Neither petition demonstrates a need for review to achieve uniformity. There is no discussion in either petition of any split of authority alleged to exist among appellate courts, and Caden is unaware of any split of authority on the question of whether a juvenile court, when considering whether a parent has met her burden of proof under the “beneficial parent-child relationship” exception, a statutory provision of the California Welfare and Institutions Code, may or must overlook the extent of the parent’s rehabilitation when assessing whether the child’s best interests would be served by maintaining the legal relationship rather than severing it to permit the child to be adopted.

To quote the Court of Appeal’s own view of the case, this was one of those “rare and difficult cases” that arises from time to time in the world of juvenile dependency law when an older child is emotionally bonded to a troubled substance-addicted parent, yet needs and deserves the legal permanency and stability of adoption to thrive. (Opinion, p. 24.) The fact that an appellate issue may be interesting, or that it is the sort of case that rarely reaches appellate courts, or that an appeal was difficult to decide, does not mean the case involves “an important question of law” that needs to be settled by Supreme Court review. (Rule 8.500(b)(1).) Following the Court of Appeal’s opinion, there remains no important issue of law or disuniformity of decision to be settled. The petitions should therefore be denied.

2. *The petitions mischaracterize the Court of Appeal’s decision.*

Nowhere in the opinion did the Court of Appeal announce a



**CERTIFICATION OF FORMAT AND WORD COUNT**  
**(California Rules of Court, Rule 8.500)**

I certify that the foregoing Answer to the Petitions for Review is proportionally spaced, has a typeface of 13 points, and contains nine pages with a total of 1,200 words, including footnotes and excluding tables, according to the word count feature of Microsoft Word, the word processing program used to prepare this document.

Dated: May 24, 2019

\_\_\_\_\_  
/s/  
DEBORAH DENTLER

**PROOF OF SERVICE**

*In re Caden C., S255839*

STATE OF CALIFORNIA     )  
COUNTY OF LOS ANGELES )

I am employed in the Law Office of Deborah Dentler in the County of Los Angeles, State of California. The business address is 510 So. Marengo Ave., Pasadena, California 91101. I am over the age of eighteen and not a party to the within action. On May 24, 2019, I served the foregoing document described as

**MINOR’S ANSWER TO PETITIONS FOR REVIEW**

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STATE OF CALIFORNIA  
Supreme Court of California

**PROOF OF SERVICE**

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/s/Deborah Dentler

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Signature

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Law Firm