

To the Clerk of the Supreme Court of California:

**The following APPLICATION OF CALIFORNIA
DEPENDENCY TRIAL COUNSEL FOR LEAVE TO FILE AMICUS
CURIAE BRIEF IN SUPPORT OF APPELLANT, MICHAEL G., and
BRIEF OF AMICUS CURIAE IN SUPPORT OF APPELLANT,
MICHAEL G. are a resubmission of documents filed on June 9, 2022
which experienced technical difficulties through TrueFiling that day.**

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

In re. A.G.,)	Case No. S271809
<i>A Person Coming Under the Juvenile</i>)	
<i>Court Law.</i>)	Court of Appeal
)	No. G060407
<hr/>)	
MICHAEL G.,)	
<i>Plaintiff and Appellant.</i>)	Superior Court of
v.)	Orange County
)	No. 19DP1381
SUPERIOR COURT OF THE STATE)	
OF CALIFORNIA FOR ORANGE COUNTY))	
<i>Respondent;</i>)	
)	
ORANGE COUNTY SOCIAL)	
SERVICES AGENCY,)	
<i>Real Party in Interest.</i>)	
<hr/>)	

After the Published Decision by the Court of Appeal
Fourth Appellate District, Division Three
Filed October 6, 2021

**APPLICATION OF CALIFORNIA DEPENDENCY TRIAL
COUNSEL FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN
SUPPORT OF APPELLANT, MICHAEL G.**

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APPLICATION FOR LEAVE TO FILE
AMICI CURIAE BRIEF

Under California Rules of Court, rule 8.520(f), California Dependency Trial Counsel request leave to file the attached amici curiae brief in support of Appellant Michael G.'s Opening Brief on the Merits. The attached brief contains an Appendix listing the organizations representing parents in juvenile dependency proceedings, collectively referred to as California Dependency Trial Counsel.

California Dependency Trial Counsel provide representation to parents in the child welfare system daily and have a significant interest in the outcome of the proceeding currently before the Court. Within their practice, California Dependency Trial Counsel represent clients who do not receive family reunification services throughout the life of the dependency case, but most importantly, up to the 18-month hearing, such as the Appellant in the instant case. Most California Dependency Trial Counsel clients qualify as indigent and cannot afford services themselves or afford to discontinue working to hunt down services available to them to reunify with their children; in addition, there are significant systemic barriers to navigating the complex web of service providers. The child welfare agency's responsibility to provide the family with reasonable services is often the only avenue to access critical services which are required for parents to heal the family and

reunify with their children.

Therefore, California Dependency Trial Counsel have a direct and legitimate stake in the provision of reasonable services in the reunification period given the potential harm to their clients' most important constitutionally protected liberty interest: the relationship with their child.

California Dependency Trial Counsel asks this Court to grant its request for amici curiae status and permit the filing of this amicus curiae brief for appellate consideration in this matter.

Dated: June 9, 2022

Respectfully submitted,

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TRIAL COUNSEL IN SUPPORT OF APPELLANT, MICHAEL G.**

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INTRODUCTION

The issue before the Court is whether fundamental fairness and due process require a remedy for a child welfare agency's failure to provide reasonable reunification services to a family in the review period leading up to an 18-month status review hearing.

Amici respectfully argue that families brought into the juvenile dependency system require support from the system to remedy problems that prevent family unity and safety. All reunification periods involve the prioritization of family preservation and the provision of reasonable efforts to enact that preservation. The Legislature has recognized that it takes time and assistance to cure issues that have brought families before the attention of the court, and that this time and assistance is owed to children to give them the best chance of the preferred permanent plan of reunification with their parents.

The Legislature has determined that reasonable efforts and services throughout the case are vital to furthering the goal of family preservation. As such, the Legislature has scheduled check points within the life span of the case to maximize the chances for the family to succeed. This support includes rights for parents at hearings, rights to ensure the family unit can be preserved whenever possible, as well as rights for children affected by reunification services.

Support for the family is initiated by the community who requests agency assistance to investigate actual safety risks to the

child. Thereafter, the responsibility transfers to the governmental agency that investigate the referral by conducting interviews with the family members and collaterals in their lives. The agency has the authority to assess if court intervention is needed and escalate to the matter to the juvenile court if necessary. Once a case comes into court, the ability and responsibility to support the family shifts to the trial court, who continues to assess if the children can safely stay within or be returned to the family home.

First, at the Initial Hearing, after the filing of a petition describing the allegations of abuse or neglect of the children, the trial court determines if the children can remain in the family home or should stay in protective custody. At this first hearing, the trial court also examines if the agency made reasonable efforts to prevent removal of the children and whether there are available services to prevent the need for further detention. (WIC §315, WIC §319.)

Second, at the Jurisdiction hearing, the trial court decides if the allegations in the petition are true based on a preponderance of the evidence before the court, followed shortly by the Dispositional Hearing. At the Dispositional Hearing, the trial court decides by clear and convincing evidence whether to remove the children from the family and whether to order reunification services for parents. Within this hearing, the trial court considers if reasonable means exist to protect the children's physical and mental health while in the care of their parent, and if the agency has made reasonable efforts to prevent or eliminate the need for the removal of the

children from their home (WIC §361(d), WIC §361(e).) In cases of serious child abuse, reasonable reunification services may not need to be provided if the trial court finds that a parent falls within one of the categories enumerated in WIC §361.5(b).

Third, if the trial court orders the children removed from their parent and then orders family reunification services, the agency again has the responsibility to provide services designed to assist the family in reunifying through programs or counseling. The trial court reviews the progress of the parents, and the safety of the family and possible return of the children at Status Review Hearings. Families with children under three years old at the filing of the petition are entitled to a minimum of six months of services post-Disposition, while families of children over the age of three are entitled to twelve months of services from the date the child entered foster care. (WIC §361.49, WIC §361.5(a)(1)(A)-(B).)

Statutes allow the trial court to extend the statutory timelines up to 18 months if the trial court finds that there is a substantial probability of return to the family or that the parent was not provided reasonable services. (WIC §361.5(a)(3).) Normally, if after 18 months -typically 3 review periods-, the child cannot be returned to the family safely, the court terminates reunification efforts and sets the matter for a Selection and Implementation hearing, which may include termination of parental rights.¹

¹ There are additional ways to extend services past the normal 18-month date, if the court finds that it would be in the best interest of the child to

At the Status Review Hearings, the trial court makes a determination of whether the agency complied with the order to provide reasonable family reunification services tailored to this family's needs. At this time, the law requires the trial court to continue reunification services if the agency failed in its responsibility to the family at the six-month and twelve-month review hearing. The instant case deals with the trial court's finding that reasonable reunification services were not provided to the family in the period prior to the 18-month review hearing, and the consequences thereafter.

continue services to a parent who is making significant and consistent progress in a court-ordered residential substance abuse treatment program, or the parent was recently discharged from incarceration, institutionalization, or the Department of Homeland Security and is making significant and consistent progress in establishing a safe home for the child's return. (WIC §366.22(b).) They have no bearing on the trial court's finding of reasonable services, and are not discussed in this brief.

ARGUMENT

I.

The Agency's Continuing Responsibility to Assist in Reuniting Families Through Reasonable Services Cannot Be Allowed to Become Meaningless.

A parent's interest in the companionship, care, custody, and management of his child is a compelling one, ranked among the most basic of civil rights. (*In re B.G.* (1974) 11 Cal.3d 679, 699.) The focus during the reunification period after the court has removed the child from the custody of the parents is to preserve the family whenever possible. (*Rita L. v. Superior Court* (2005) 128 Cal.App.4th 495, 507.) As such, at the review hearings prior to permanency planning, statutory presumptions favor returning the child to parental custody. (*David B. v. Superior Court* (2004) 123 Cal.App.4th at 788, citing *In re Marilyn H.* (1993) 5 Cal.4th 295, 308.) ("*David B.*") To meet this statutory presumption, the child welfare agency must provide reasonable reunification services to the family.

Reasonable reunification services "aim to provide the assistance and services needed to preserve and reunify families" and generally "consist of accessible, available, and culturally appropriate services that are designed to improve the capacity of families to provide safe and stable homes for their children." (Child Welfare Information Gateway, Reasonable efforts to preserve or reunify families and achieve permanency for children (2020) p. 2.)

Families need time and resources to overcome the circumstances leading to jurisdiction which include dealing with the

same issues many families face outside of juvenile dependency – substance abuse, mental health distress, and intimate partner violence – but in the context of poverty. The time is provided by the trial court at each interval where it extends reunification, and the resources are provided by the child welfare agency: the 12- to 18-month interval is no less a reunification period than the prior periods.

A. Some families need the entirety of the 18-month period granted to them by statute.

“The parents who come through the dependency system are more in need of help than most.” (*David B.*, *supra*, 123 Cal.App.4th 768 at 789.) Parents who are in reunification services with their children have deficits, as the trial court has already sustained some form of abuse or neglect has occurred. Family reunification services are essential to the endeavor of healing the family once they are granted the opportunity to reunify with their children because “the State of California is not in the business of evaluating parents and redistributing their offspring based upon perceived merit.” (*Ibid.*)

Oftentimes, the parents who participate in dependency proceedings are those who have been abused as children themselves: research suggests children who experienced abuse and neglect are more likely to abuse or neglect their own children compared to children who were not in dependency proceedings. (Child Welfare Information Gateway, Long-term consequences of

child abuse and neglect (2019) p. 4.) A 2018 study from Canada found that adolescent mothers who were in the care of child protection services (CPS) when they gave birth to their first child were more likely to have that child taken into CPS care before the child's second birthday than adolescent mothers who were not in the care of CPS. (Wall-Wieler, 2018.) Furthermore, a 2011 study found that "second generation families experience significantly more risk factors at the time of case opening and are two-thirds as likely to be reunified as compared with first generation families. The singular effects of generation status disappeared, however, once the interaction between mental health diagnosis and second generation status was entered into the model, suggesting that it is not just being intergenerationally involved in the child welfare system that reduces the chance of reunification, but rather second generation caregivers have more mental health problems that are associated with a lower likelihood of reunification." (Marshall, 2011, p. 1024.)

The Second District Court found in *In re Daniel G.* that reasonable services were not provided to a mother who suffered from a serious mental illness, and thus "delayed the permanent placement of a child who had been in state custody since he was four days old." (*In re Daniel G.* (1994) 25 Cal.App.4th 1205; Kaiser, *Finding a Reasonable Way to Enforce the Reasonable Efforts Requirement in Child Protection Cases* (2009), 7 Rutgers J.L. & Pub. Pol'y 100, 123.) The mother had been diagnosed with mental challenges, suffered from schizophrenia and poor impulse control. At the 18-month date,

the trial court found that the services provided to the mother were a "disgrace." (*In re Daniel G., supra*, 25 Cal.App.4th at 1209.) Among other things, the Court of Appeal affirmed the 18-month hearing "is generally a party's final opportunity to litigate the issue of parental fitness as it relates to any subsequent termination of parental rights, or to seek the child's return to the parent's custody" and therefore "given the magnitude of the challenged order in the overall dependency scheme[,] the trial court could use its discretion to determine whether an additional period of reunification services should be required. (*Id.* at 1216.)

The Fifth District Court in *In re Victoria M.* examined a case of the termination of parental rights of a mentally disabled mother who did not receive reasonable family reunification services. (*In re Victoria M.* (1989) 207 Cal.App.3d 1317.) The Court there found that the services provided to the mother were not reasonably tailored to her specific needs and reversed the termination of mother's parental rights, stating "[i]f, however, generic reunification services are offered to a parent suffering from a mental incapacity [...], failure is inevitable, as is termination of parental rights." (*In re Victoria M., supra*, 207 Cal.App.3d at 1332-1333.)

Without repercussions for failing to uphold the agency's responsibility to assist the family with reunification, parents are not likely to receive the full 18-months the family may need to obtain stability and safety, and "the Legislature's expectation the family will receive reasonable reunification services is reduced to a mere

hope.” (*In re Daniel G.*, *supra*, 25 Cal.App.4th at 1215.)

- B. Courts have traditionally protected rights granted to parents in dependency proceedings even when the Legislature did not explicitly provide for it.

This Court and the California Courts of Appeal have traditionally prevented conduct in juvenile dependency cases that ignore a parent’s rights during their reunification efforts with their children and beyond.

Preservation of Right to Competent Counsel

In *In re A.R.*, this Court dealt with the late filing of an appeal by a parent’s counsel in dependency proceedings, and the parent’s right to competent counsel. The mother’s trial attorney filed her notice of appeal of an order terminating her parental rights four days late; the mother then attempted to remedy the error and filed her appellate brief on time. (*In re A.R.* (2021) 11 Cal.5th 234.)

This Court reviewed the Court of Appeal orders dismissing the mother’s appeal and habeas corpus petition regarding her attorney’s performance. This Court examined whether a parent has the right to challenge counsel’s failure to file timely notice of appeal from the order terminating parental rights, and what if any are the proper procedures to raising the claim.

This Court found that the 1994 addition to WIC §317.5(a) to state that “[a]ll parties who are represented by counsel at dependency proceedings shall be entitled to competent counsel”

was not a hollow right, and that a parent may seek to address a deprivation of her right to competent representation, setting out the contours in which a parent can do so. (*In re A.R.*, *supra*, 11 Cal.5th at 348; WIC §317.5(a).)

Preservation of Reasonable Efforts to Prevent Removal at Disposition

In *In re M.V.*, the Fourth District Court dealt with the reasonable efforts to prevent removal of the children from the home at Disposition. There, a mother was a domestic violence aggressor, and the agency advised the trial court that a possible option for the children to remain in the home with the maternal great grandmother would not work as maternal great grandmother did not want to live with father, who would still be in the home, and who the court found had not affirmatively requested the children to be placed with just him. The Appellate Court found that by solely relying on the agency's option of sending the children with the maternal great grandmother, the trial court failed to consider removing the mother from the family home instead of removing the children from the family home where father could reside with them. As the Court noted, "there is a danger the agency's declarations that there were 'no reasonable means' other than removal 'by which the [children's] physical or emotional health may be protected' and that 'reasonable efforts were made to prevent or to eliminate the need for removal' can become merely a hollow formula designed to achieve the result the agency seeks" without the trial court's independent duty to

examine in reasonable services were made to prevent removal from the home. (*In re M.V.* (2022) 78 Cal.App.5th 944, 965 citing *In re Ashly F.* (2014) 225 Cal.App.4th 803, 810.)

Preservation of Right to Noticed Hearing for Guardian Ad Litem

In *In re Sara D.*, the Fifth District Court considered whether a parent was entitled to a noticed hearing at which a guardian ad litem would be appointed for her and be given an opportunity to respond to evidence presented. The mother in this case had been diagnosed with borderline personality disorder and had trouble communicating with her trial counsel. The trial court found, after an in chambers conference with counsel that mother would be appointed a guardian ad litem because 1) the trial court had already relieved one trial attorney, 2) the trial court was conducting a contested jurisdictional hearing, and 3) a guardian ad litem would benefit the mother in preparation for the hearing and understanding the proceedings. (*In re Sara D.* (2001) 87 Cal.App.4th 661.)

The Court of Appeal found that the appointment of a guardian ad litem is so significant that it may jeopardize a parent's "fundamental interest [...] in the companionship, care, custody, and management of the child" and therefore, creating such a transfer without due process such as a noticed hearing and the ability to present and respond to evidence may nullify the other due process protections afforded to a parent during dependency proceedings. (*In re Sara D., supra*, 87 Cal.App.4th at 669.)

None of the above cases contain model parents: the first parent already had seen her reunification services and parental rights terminated, the second parent had not affirmatively requested his children be placed in his custody, and the third parent had mental health issues and difficulties communicating with her appointed attorney. Nonetheless, this Court and the Courts of Appeal upheld their rights in juvenile dependency proceedings, regardless of their imperfections and lack of specific Legislature direction.

II.

The Absence of an Automatic Remedy for the Failure to Provide Reasonable Services at the 18-Month Hearing Does Not Infer Intent to Disregard the Family's Right to Reunification Services Up to the 18-Month Date.

California Dependency Trial Counsel join in Appellant's argument that an automatic remedy is needed for families who were not provided with reasonable reunification services leading up to the 18-month hearing in order to align with the statutory presumption of reunification and preserve the family's fundamental liberty interests.

- A. Once reunification services are ordered by the trial court, the agency must not be permitted to shirk the responsibility to provide services to the family while enjoying on freedom from consequences.

The Legislature has carved out multiple provisions that allow a trial court to order the bypass of reunification services to a parent at the Dispositional hearing. They include, but are not limited to, causing the death, severe physical or sexual abuse of the child or of a sibling, and the more commonly used unknown whereabouts or the termination of reunification services or parental rights for a sibling. (WIC §361.5(b)(1)-(17).) The bypass statutes provide that once any of these provisions are found to apply, the burden of proof shifts to the parent to show by clear and convincing evidence that reunification is in the best interest of the child. (WIC §361.5(c)(2).)

The Legislature has designed the statutes to safeguard against fiscal waste if reunification services would be futile, and to prevent the child from further traumatization if the abuse was severe. If the provisions do not apply, the trial court ordinarily orders that the family receives services, which the agency is obligated to provide. The duality of preventing the parents who cannot reunify with their children due to serious offences while simultaneously requiring family reunification services for the families who will benefit from them comports with the Legislature's stated intent to encourage speedy reunification of the family unit.

Once the trial court orders services, the Legislature's reunification scheme mandates that those reasonable services are provided to the family during every reunification period.

B. Despite a lack of a Legislative requirement for a finding of reasonable services at the 18-month hearing prior to setting a Selection and Implementation hearing, trial courts regularly make the finding to ensure continued Federal funding.

Real Party in Interest informs this Court that currently there is no requirement to find by clear and convincing evidence that reasonable services were provided at the 18-month review hearing to proceed to the termination of parental rights hearing.

However, the Code of Federal Regulations outlines that if the reasonable efforts finding regarding finalizing a permanent plan is not made, “the penalty for [...] a ‘no reasonable efforts’ finding by the court, is a loss of federal funds expended on behalf of the particular child for the period of time when the juvenile court found reasonable efforts to be lacking.” (45 CFR §1356.21(b)(2)(ii); Edwards, Reasonable Efforts: A Judicial Perspective (2021) p. 18.) Therefore, in practice, trial courts regularly make reasonable services findings at the 18-month date, as to not risk the federal funding for the child in foster care. Thus, although reasonable service finding requirements to proceed to the termination of parental rights may not be currently in the code, they are commonplace at the 18-month hearing to ensure funding for children who remain out of the family home.

Furthermore, “when the judge realizes that a negative finding will impact the resources for the local agency, it becomes difficult to make such a finding” due to the financial penalties against the local child welfare agency; consequently, trial courts are hesitant to make

this finding. (Edwards, Reasonable Efforts: A Judicial Perspective (2021), p. 38.) Consequently, if a trial court finds that reasonable services were **not** provided, as in the instant case, it speaks to the degree of the deprivation of services and underscores the family's need for remedy. The "court has a legal and ethical obligation to make [the no reasonable services] finding" if the child welfare agency did not provide adequate services to assist with reunification. (Edwards, Reasonable Efforts: A Judicial Perspective (2021) p. 112.) Once it is made, there is a need for accountability and consequences, including a real remedy for the family in the form of continued family reunification services.

CONCLUSION

Parents in the dependency court system are not perfect and in need of assistance to re-forge the family unit: many require the court-ordered reunification assistance with services up to the 18-month date. Once services are ordered, families deserve to take full advantage of the services to ensure that the danger to the safety and well-being of the children is remedied and that children can be returned to the care and custody of their parents.

Amici respectfully request this Court to grant Appellant's request to determine that the 18-month statutory scheme requires the parent to be provided with reasonable reunification services prior to terminating said services and setting of the Selection and Implementation hearing.

Dated: June 9, 2022

Respectfully submitted,

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APPENDIX A: Description of Amici Curiae
California Dependency Trial Counsel

Los Angeles Dependency Lawyers, Inc. (LADL) was formed in December of 2006 as a non-profit organization to represent parents in juvenile dependency proceedings in Los Angeles County, and to assure parents receive a fair and reasonable opportunity to parent their child. The parents in the instant appeal were not represented by LADL during the juvenile dependency proceedings but share experiences that are common to many LADL clients. Most LADL clients are indigent and cannot afford services or find services without the assistance of the local child welfare agency. LADL provide consistent legal representation to their clients through the life of the dependency case and observe the negative impact when there is a failure to provide reasonable family reunification services to parents.

East Bay Family Defenders (EBFD) is an Internal Revenue Code section 501(c)(3) nonprofit public benefit corporation providing holistic, interdisciplinary legal representation and advocacy to families at risk of or experiencing family separation through foster care. From 2018 through 2021, EBFD served as court-appointed counsel for all parents and conflict children in Alameda County's juvenile dependency court. EBFD's mission is to keep families together and prevent the unnecessary and prolonged stay of children in foster care.

Dependency Legal Services is a non-profit, public interest law firm that provides the finest legal representation to children, parents, guardians and Native American custodians in the child welfare system. Our office is comprised of a multi-disciplinary team of professionals including attorneys, investigators/social workers, administrative staff, and parent mentors committed to client advocacy and empowerment that seeks to remove barriers to family reunification and support permanence. Our work in eight Northern California counties allows us to marshal the resources, influence, and experience of a large firm for the benefit of small and mid-size

counties.

Dependency Advocacy Center (DAC) is a nonprofit 501(c)3 organization providing interdisciplinary family defense legal services to indigent parents and conflict children involved in Santa Clara County's child welfare system. Our adult clients face the removal of their children due to concerns of abuse and neglect with a myriad of issues presented, including poverty, intergenerational trauma, substance abuse, domestic violence, and mental health. DAC's goal is to promote timely reunification and preservation of these families in a safe, healthy environment. DAC collaborates with partner agencies both locally, statewide, and nationally to assist in the development and integration of child welfare best practices. Our court appointed counsel and preventative legal services attorneys work with in-house social workers and mentor parents with lived experience who inform our practice and ensure fidelity to our mission.

Inland Juvenile Panel Attorneys represents parents, and at times conflict children, in San Bernardino County. Inland Juvenile Panel Attorneys and its predecessor organizations have contracted with San Bernardino County for over 30 years for the representation of parents in juvenile dependency court.

The Private Defender Program was established by The San Mateo County Bar Association, a non-profit corporation governed by a 15-member Board of Directors, in 1968 to fulfill its promise to provide zealous representation to all those who could not otherwise afford it. The Private Defender Program consists of a panel of experienced private attorneys dedicated to the practice of criminal defense, dependency, and juvenile justice work. The Private Defender lawyers work with a panel of well-trained investigators, social workers, and experts in a variety of fields to provide the most complete approach possible to every case. The Private Defender Program- Juvenile Branch is appointed by the San Mateo County Superior Court to represent all children and parents that are

financially eligible for the appointment of counsel. The Private Defender Program is also appointed to represent juveniles in delinquency cases. Our mission is to provide high quality multidisciplinary representation to the parents and children we serve.


San Francisco Counsel for Families & Children (SFCFC) is comprised of independent, court-appointed attorneys representing children and parents in San Francisco's juvenile dependency court. These attorneys have come together to speak with one voice on matters that impact their clients, their legal community, and child welfare law practice and policy.

CERTIFICATION OF WORD COUNT

The text of this brief consists of 3,532 words as counted by this Microsoft Word for Microsoft 365 version word-processing program used to generate this brief.

Dated: June 9, 2022

Respectfully submitted,

By: 

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CERTIFICATION PURSUANT TO CALIFORNIA
RULE OF COURT 8.520 subdiv. (f)(4)

Amici affirm that no counsel for any party authored this brief in whole or in part; no party or party's counsel contributed money intended to fund preparing or submitting this brief; and no other person or entity contributed money to fund preparing or submitting this brief.

Dated: June 9, 2022

Respectfully submitted,

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DECLARATION OF SERVICE

I, Dominika Campbell, declare I am a citizen of the United States, over 18 years of age, and not a party to the within action; my business address is 901 Corporate Center Drive, Suite 520, Monterey Park, CA 91754. On June 9, 2022 I caused to be served the following document: APPLICATION OF CALIFORNIA DEPENDENCY TRIAL COUNSEL FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF APPELLANT, MICHAEL G., together with a copy of the BRIEF OF AMICUS CURIAE IN SUPPORT OF APPELLANT, MICHAEL G. by placing in the U.S. mail true copies thereof, enclosed in sealed envelopes with sufficient postage, addressed as follows:

California Court of Appeal
Fourth District, Division Three
P.O. Box 22055
Orange, CA 92868

Orange County Juvenile Court
Hon. Antony Ufland, Judge
Santa Ana, CA 92702
341 City Drive, Dept. L34

I also electronically served copies to the following via email:

Donna Chirco
[Mother's Appellate Counsel]
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Orange County Counsel
Juvenile Writs & Appeals
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Juvenile Defenders, Amanda Tarby,
[Mother's Trial Counsel]
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Offices of Harold LaFlamme
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Brian Okamoto
Orange County Public Defender
[Appellant's Counsel]
Brian.okamoto@pubdef.ocgov.com

I declare under penalty of perjury the foregoing is true and correct. Executed this 9th day of June 2022, at Monterey Park, California.

By: 

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STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **G. (MICHAEL) v. S.C. ORANGE COUNTY SOCIAL SERVICES AGENCY**
Case Number: **S271809**
Lower Court Case Number: **G060407**

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.

6/10/2022

Date

/s/Dominika Campbell

Signature

Campbell, Dominika (319727)

Last Name, First Name (PNum)

Los Angeles Dependency Lawyers

Law Firm