S271809

IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA

MICHAEL G.,

Petitioner

vs.

SUPERIOR COURT OF ORANGE COUNTY,

Respondent;

ORANGE COUNTY SOCIAL SERVICES AGENCY, et al.,

Real Parties in Interest

After a Decision by the Court of Appeal
Fourth Appellate District, Division Three, Case No. G060407
(*Michael G. v. Superior Court* (2021) 69 Cal.App.5th 1133)
Denying a Petition for Extraordinary Writ Relief to the Superior Court
For the County of Orange, Case No. 19DP1381
Honorable Antony C. Ufland, Judge

ANSWER TO AMICI CURIAE BRIEFS FILED BY CHILDREN'S LAW CENTER OF CALIFORNIA, CHILDREN'S LEGAL SERVICES OF SAN DIEGO, AND DEPENDENCY LEGAL SERVICES; CALIFORNIA DEPENDENCY TRIAL COUNSEL; AND CALIFORNIA STATE ASSOCIATION OF COUNTIES

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Topical Index

Page(s)

Table of Authorities

Cases **Page(s)**

California Statutes

Welfare and Institutions Code

Table of Authorities – Cont'd.

California Statutes (cont'd.) **Page(s)**

State Statutes

Miscellaneous Authorities

I. INTRODUCTION

Real Party in Interest Orange County Social Services Agency ("SSA") submits this brief in answer to the amici curiae briefs in support of the Petitioner/father, Michael G. (Father), filed by California Dependency Trial Counsel ("CDTC") and by Children's Law Center of California, Children's Legal Services of San Diego, and Dependency Legal Services ("CLC"). SSA joins in the amicus curiae brief filed in support of SSA by California State Association of Counties ("CSAC").

II. ARGUMENT

A. AMICI CLC'S AND CDTC'S ARGUMENTS ARE POLICY ARGUMENTS BEST DIRECTED TO THE STATE LEGISLATURE

Amici CLC and CDTC basically claim the current statutory scheme is unfair. Their arguments are fundamentally policy suggestions over how to weigh the various competing interests. As such, they are best directed to the Legislature, which has made a different determination.

As discussed in detail in SSA's Answer Brief, the Legislature struck a balance, turning on the stage of the proceeding. The Legislature determined that the interests of the parents in raising their child as well as the interests of the parents and child in family preservation/reunification would prevail at the early stages of the process, but that at some point the interests of the child in stability and permanency would become dominant. It then set some guideposts. The dependency scheme sets up distinct periods and escalating standards for the provision of reunification services. The effect of these shifting standards is to make services first presumed, but

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then increasingly difficult to extend as the case progresses. (SSA Answer Br., pp. 31-35.)

In adopting this scheme, the Legislature took full account of the diversity of views on the appropriate length of time for reunification efforts, and weighed various competing interests. The presence of countervailing interests makes the question of how long to extend reunification services difficult, and necessitates balancing. CLC and CDTC pay short shrift to the Legislature's careful balancing act. Instead, they urge a regime that would cater less to the child's interest in stability and permanency in order to prioritize the parents' interests in raising and reunifying with their child. The Legislature simply reached a different, and wholly permissible, conclusion regarding that balance. (See SSA Answer Br., pp. 31-35.)

B. TERMINATING REUNIFICATION SERVICES AT THE 18-MONTH REVIEW WITHOUT A FINDING THAT REASONABLE SERVICES WERE PROVIDED DOES NOT VIOLATE DUE PROCESS

Both CLC and CDTC claim that due process compels the extension of reunification services at the 18-month stage if the juvenile court has declined to find that the parent was offered reasonable reunification services. CLC contends that "when a parent is not provided with reasonable reunification services, the finding of parental unfitness is not reliable and possibly erroneous." (CLC Br., pp. 23-24.) CLC further claims that, since child protection agencies are tasked with providing reunification services, "the principle of fundamental fairness requires that the juvenile court hold the government to its agreement." (CLC Br., p. 25.) For their part, CDTC point to various procedural rights protected for parents by reviewing courts (CDTC Br., pp. 18-21), and urges this Court to create a currently nonexistent "automatic remedy" for all parents deprived

of reasonable services in the period preceding the 18-month review (CDTC Br., pp. 21-22).[1]

CLC and CDTC erroneously attempt to isolate the reasonable services finding, which is only one aspect of the 18-month review hearing, and argue a violation of due process based on their limited chosen factors. But the lack of a reasonable services requirement must instead be analyzed as to how it fits into the 18-month stage of the dependency proceedings as a whole, as well as how it fits into the overall dependency scheme. (See *Cynthia D. v. Superior Court* (1993) 5 Cal.4th 242, 253 (*Cynthia D.*) ["Turning to the current statutory scheme, [Welfare and Institutions Code][2] section 366.26 cannot properly be understood except in the context of the entire dependency process of which it is part."].)

Even if considered in isolation, there is no due process or any other requirement to provide 18 months of reasonable services. Indeed, reunification services need not be offered at all in certain circumstances, and may be terminated after merely six months in others. As the seminal authority in the area of law from the United States Supreme Court stresses that, once parental unfitness has been established by clear and convincing evidence, the juvenile court may then subsequently assume "the interests of the child and the natural parents do diverge." (*Santosky v. Kramer* (1982) 455 U.S. 745, 760.) As discussed in SSA's Answer Brief, there is no constitutionally-protected right to reunification services, which are typically

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[1] This latter sentiment essentially echoes the arguments in Father's Reply Brief, with both CDTC and Father all but conceding that the various statutory provisions discussed at length by both SSA and Father do *not* in and of themselves provide any such "automatic remedy" as currently written. (CDTC Br., p. 21; Father's Reply Br., pp. 11, 18.)

[2] All statutory references are to the California Welfare and Institutions Code unless otherwise noted.

understood as a benefit provided to parents rather than a constitutional entitlement. Any right to reunification services is merely statutory. Thus, although a parent should customarily be offered a certain period of reasonable services, if reunification services are offered, before his or her parental rights may be terminated, it is within the authority of the Legislature to determine for how long those reasonable services need be offered, and under what circumstances services can end. (SSA Answer Br., p. 52.) The Legislature has determined that services are typically afforded as a matter of statutory right to parents of children three years or older at the time of removal from parental custody, for only 12 months; and can be extended to 18 months only if certain conditions exist. (SSA Answer Br., pp. 17, 33-34; §§ 361.5, subds. (a)(1)(A), (a)(3)(A), 366.21, subd. (g)(1).)

In comparison, different states set different minimum amounts of reunification services. Although most states, including California, set the permanency hearing, at which reunification services can be terminated for most parents and the court can order return to the parent or another permanency goal, at 12 months, "[s]ome States, however, maintain shorter timelines for conducting initial permanency hearings. In New York, Oklahoma, and Texas the first permanency hearing must be held within 6 months. In Connecticut, the first hearing must be held within 9 months, and in Virginia, the hearing must be held within 10 months. In Louisiana, if the child was removed from the home before the disposition hearing, the permanency hearing must occur within 9 months." (Court Hearings for the Permanent Placement of Children, Children's Bureau/Administration for Children and Families/U.S. Department of Health and Human Services, https://www.childwelfare.gov/pubPDFs/planning.pdf (last visited July 1, 2022) at p. 2; see N.Y. Fam. Ct. § 1089, subd. (a)(2); 10A Okl. St. Ann. § 1-4-811, subd. A.1.a; V.T.C.A., Fam. Code § 263.304, subd. (a);

C.G.S.A. § 46b-129, subd. (k); VA Code Ann. § 16.1-282.1, subd. A; LSA-Ch.C. Art. 702, subd. B.)

Thus, the Legislature has the authority to determine the impact of the reasonableness of the services offered between the 12-month and 18-month review hearings, and to consider any deficiency as merely one of multiple factors when determining whether the court can terminate services and proceed to a section 366.26 hearing. Neither CLC nor CDTC come to grips with the statutory scheme as a whole, both with respect to the procedural and substantive protections afforded to a parent prior to a child's removal from custody as well as the numerous procedural safeguards for parents receiving reunification services. In line with federal constitutional requirements, a child can only be removed from parental custody upon a showing by clear and convincing evidence that the child is at substantial danger in the parent's care. (*Cynthia D., supra,* 5 Cal.4th at p. 253.) From there, at every reunification review hearing, SSA and its sister child protection agencies must overcome the presumption in favor of return to parental care. "Only if, over this entire period of time, the state continually has established that a return of custody to the parent would be detrimental to the child is the section 366.26 stage even reached." (*Ibid*.)

Within this statutory structure, the Legislature has further determined which parents are entitled to reunification services at all (§ 361.5, subd. (b)), and for which parents such services may be terminated after six months (§ 366.21, subd. (e)(3)). More pertinent to the present case, the Legislature has also ensured that reunification services cannot be terminated either at the six-month stage or the presumptive-minimum 12-month stage if reasonable reunification services were not provided. (§§ 366.21, subds. (e)(3), (g)(1).) It is only at the 18-month stage where, as

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discussed at length in SSA's Answer Brief, the Legislature has declined to condition the termination of services on such a finding.

This legislative choice does not infringe on any constitutional requirements. In effect, the Legislature has guaranteed a year of reunification services for most parents, with those services only to be terminated after that year upon a reasonable services finding. Indeed, neither CLC nor CDTC present any theoretical constitutional roadblock for the Legislature to set 12 months as its outer bound for such services. Instead, the Legislature has chosen to allow a possible extension of such services in most cases only up to the 18-month point, after which, as documented in detail by amicus CSAC, the negative outcomes of extended foster care stays become significantly more pronounced. (See CSAC Br., pp. 13-19.) In doing so, the Legislature chose to make that 18-month date the presumptive outer limit for reunification services save for a specific classification of parents described in section 366.22, subdivision (b). (See SSA Answer Br., pp. 12-13, 36-38, 41-43; CSAC Br., pp. 18-19)

CLC and CDTC attempt to convince this Court that the failure to condition termination of services on a reasonable services finding at that late 18-month date, irrespective of the requirements of earlier review hearings held under section 366.21, runs afoul of constitutional guarantees for both parents and children. Not so. The Legislature's direction for 12 months of reunification services for most parents, and an additional six-month period upon a showing of either substantial probability of return or that services were not reasonable (see § 366.21, subd. (g)(1)), allows for a long, guaranteed period of such services that may extend even longer under certain circumstances. What the Legislature has done is simply recognize that, as a child languishes ever longer in foster care, a juvenile court should have the authority to discontinue such reunification efforts based on the

circumstances at the time of the hearing – a determination that will, of course, take into account the extent and effect of any inadequate services, but will not automatically extend services based on any such shortcomings. (See *Mark N. v. Superior Court* (1998) 60 Cal.App.4th 996, 1017.)

Neither amici CLC and CDTC nor Father explain why allowing for a possible extension of services under section 352, rather than automatically extending the reunification period if services are deemed unreasonable, deprives a parent or a dependent child of any substantive or procedural due process right. Any litigant is allowed to argue that the particular inadequacies in a case's services have too severely hampered the court's ability to evaluate the parent's capability to care for the child. (See CLC Br., pp. 24-26.) Likewise, any party, particularly minor's counsel, may argue that further services are warranted in light of the minor's interest in reunification with a parent deprived of reasonable services. (See CLC Br., p. 30.)[3] When a court has deemed services to be lacking, litigants may assert each and every consideration now raised by amici CLC and CDTC in order to justify a further extension of services, with the court bearing in mind all such considerations after having presumably extended such services twice before. Section 352 offers a sufficient remedy for any such issues at such a late stage in the reunification process.

The sound reason for such a rule at the 18-month review hearing – one that allows for a transition to permanency planning even where the prior service period was marked by inadequate services – is well illustrated

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[3] Minor's counsel is entrusted with advocating for the child's best interest. (§ 317, subd. (e)(1).) A court declining to find that reasonable services have been provided, combined with minor's counsel joining the parent in advocating for a continuance of the section 366.22 hearing, will most likely produce a strong showing for additional services pursuant to section 352.

in the present case. The juvenile court found services deficient due largely to SSA's failure to properly address Father's psychological issues. (*Michael G. v. Superior Court* (2021) 69 Cal.App.5th 1133, 1140, fn. 2 (*Michael G.*).) But continuing such services would not serve the child's best interest, as Father had failed to maintain regular contact with the child, made limited progress on the issues that spurred SSA intervention, and did not demonstrate the capacity to complete his service plan. (*Id*. at p. 1145.) Rather than consign the child to yet another service period that would almost certainly prove fruitless, the juvenile court chose to proceed to permanent planning. The state's dependency judges are tasked with difficult and often heart-wrenching decisions, and neither amici nor Father show that these judges are unable to properly balance the various factors of a section 352 analysis.

This balancing act at the tail end of a long reunification period is a natural byproduct of the system's competing goals. As noted *supra*, absent a finding that reunification services have been reasonable, a parent is guaranteed 18 months of reunification services. But were this requirement to apply regardless of the length of time such services were offered, a minor could unnecessarily languish in foster care at that late stage even when the court could conclude that the particular flaws in services were immaterial to the parent's failure to reunify, and/or when the parent's behavior has made it obvious that additional efforts are futile. A section 352 analysis still allows for consideration of any service deficiencies alongside additional factors that go to the child's best interest at such an advanced stage.

The principal authority cited by amici CDTC and CLC to suggest that the current statutory framework violates due process is unavailing. The reviewing court in *In re Daniel G.* (1994) 25 Cal.App.4th 1205 (*Daniel G.*) noted its concern for the accuracy of the court's finding that return of the

minor to parental care would be detrimental as it concluded that "in order to meet due process requirements at the termination stage, the court must be satisfied reasonable services have been offered during the reunification stage." (*Id.* at pp. 1215-1216.) But the court in *Daniel G.* gives short shrift to the fundamental role of the Legislature in regulating the statutory – not constitutional – entitlement to reunification services, including the presumptive minimum amount of services and the progressively-changing standards for that entitlement. (See SSA Answer Br., pp. 33-34, 51-52.) The Legislature has made a reasonable services finding mandatory at the six- and 12-month review stages in order to proceed to a section 366.26 hearing, and further provided that parental rights cannot be terminated if a parent who has been granted such services has not been provided reasonable services during at least one service period. (See SSA Answer Br., pp. 40-41.)[4] It has further provided a statutory mechanism – section 352 – by which any service inadequacies can be raised and evaluated within a broader consideration of whether a continuance of the case at the 18-month stage is warranted.[5]

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[4] Even the termination of services under such circumstances does not foreclose future reunification efforts. The parent would still be entitled to regular review hearings at which the juvenile court may reinstitute reunification services if the parent proves "by a preponderance of the evidence, that further efforts at reunification are the best alternative for the child." (§ 366.3, subds. (e)(4), (f).) The court also considers "all permanency planning options for the child including whether the child should be returned to the home of the parent." (§ 366.3, subd. (h)(1).)

[5] Indeed, even if this Court were to indulge the arguments of amici CLC and CDTC and Father as to the constitutional need for a reasonable services finding in order to terminate such services, authority cited by both CLC and Father (see CLC Br., p. 24; Father's Opening Brief, p. 52) suggests that this due process hurdle would be cleared if services are deemed reasonable "for at least the period specified as the statutory minimum" and that the "statutorily required minimum period – [is] here, 12

After considering the statutory scheme, the principal authority upon which *Daniel G.* relied did not conclude that a finding of reasonable services was necessary to proceed to a section 366.26 hearing from the 18-month review; instead, the reviewing court concluded that "the court was entitled to weigh the various interests involved and exercise its discretion." (*In re Dino E.* (1992) 6 Cal.App.4th 1768, 1778 (*Dino E.*); see *Daniel G., supra*, 25 Cal.App.4th at pp. 1212-1213.) Moreover, even the *Daniel G.* court seems to fall short of requiring such a finding, instead hewing to the *Dino E.* approach in directing the juvenile court on remand to "consider the services already provided [ ], the likelihood of success of any further reunification efforts, whether Daniel's need for a prompt resolution of his status outweighs any benefit from further reunification services and such other factors as the parties may bring to the court's attention." (*Daniel G., supra*, 25 Cal.App.4th at pp. 1216-1217; see *Dino E.*, *supra*, 6 Cal.App.4th at pp. 1779-1780 ["The court may consider the likelihood of success of any further reunification efforts, the fact that nearly a year has passed in Dino's life during the pendency of this appeal, any information developed pursuant to the court's previous orders, and the circumstance that appellant, as the parties have informed us at oral argument, is presently incarcerated."].)

Thus, *Daniel G.'s* and *Dino E.'s* holdings that the juvenile court has discretion to extend reunification services beyond the 18-month review

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months." (*T.J. v. Superior Court* (2018) 21 Cal.App.5th 1229, 1256.) This requirement would presumptively be met in all cases with antecedent reasonable services findings at the six- and 12-month review, or, in the event of a combined section 366.21/366.22 hearing, a finding by the court that service deficiencies were limited to the timeframe after the statutory minimum period would have elapsed. The instant case would clear any such due process hurdle, as the juvenile court found that the parents received reasonable services during the six- and 12-month review periods. (*Michael G., supra,* 69 Cal.App.5th at p. 1139.)

hearing after duly weighing the various factors results in essentially the same analysis that the juvenile court undertakes under section 352. Those cases, in fact, support a discretionary rather than automatic extension of services.

Moreover, even if the 1994 *Daniel G.* case was interpreted to hold that reasonable services must be offered at all three stages of an 18-month reunification period in order to terminate reunification services and move forward to a section 366.26 hearing, the statute has since changed. In 2009, the Legislature rejected that view, instead amending section 366.22 to require a reasonable services finding only as to cases falling under subdivision (b), for parents in limited circumstances that do not apply here. (See SSA Answer Br., pp. 42-43.) Indeed, as detailed in SSA's Answer Brief, section 366.22 has been revisited by the Legislature multiple times, and the Legislature has repeatedly declined to adopt CLC's and CDTC's desired automatic extension of services rule. (SSA Answer Br., pp. 42-45; see also CSAC Br., pp. 21-22.)

CDTC argues that in various other situations reviewing courts have protected rights granted to parents in dependency proceedings even when the Legislature did not explicitly provide for it. (See CDTC Br., pp. 18-21.) But such a general assertion in situations when the Legislature did not offer specific direction does not override the Legislature's definite rejection here of automatic extension of services. CDTC's proffered cases are not analogous to the instant situation.

CLC and CDTC, like Father, would have this Court believe that the aforenoted use of section 352 as the safety valve for a possible extension of reunification services has been unconstitutional for over a quarter century. The truth is far more anodyne. The Legislature has chosen to condition the

termination of reunification efforts on the provision of reasonable services, but only within the first year of such services. Thereafter, if a court concludes at the 18-month stage that services in that preceding review period were inadequate, the court may extend services if, after considering both service deficiencies and other factors, it considers such an extension to be in the child's best interests. Rather than showing an impermissible disregard for parental and minors' rights as Father and aligned amici claim, this system recognizes that children in foster care must at a certain stage be steered towards permanent planning, and that service deficiencies as to the parents should be an important, though not dispositive, consideration after a year-and-a-half of such efforts. As CSAC explains, studies indicate that 18 months is a crucial point beyond which children in out-of-home care tend to experience significantly more negative outcomes, and therefore 18 months is where Congress and the California State Legislature have accordingly drawn the line to move toward permanency. (CSAC Br., pp. 13-19.)

Finally, CLC partially bases its arguments on its claim that children have an independent interest in reunifying with their parents. (CLC Br., pp. 27-34.) But this interest is already protected by the current scheme, as the section 352 analysis as to whether to extend services primarily considers what would be in the child's best interest. At that stage, and indeed at every earlier stage in a dependency case, the dependent child may, through counsel, concur with, object to, or supplement an agency's recommendations. The Legislature reasonably gave the juvenile court discretion to determine whether that interest is indeed paramount at the 18-month review stage, rather than requiring automatic extension of reunification services absent a reasonable services finding when the child's best interest may lie elsewhere. Indeed, here, minor's counsel urged the juvenile court to terminate reunification services and set a 366.26 hearing.

(Reporter's Transcript 127-132.) Therefore, in this case, CLC's and CDTC's desired automatic rule of extending services would not be applied based on any rights of the child; and if applied, would run counter to the child's wishes to assert instead her right to permanency and stability.

III. CONCLUSION

CLC and CDTC advocate policy positions that, if adopted by the Legislature, would forward legitimate policy ends. SSA does not claim that these positions are illegitimate – rather, they reflect a balance that differs from the one determined by the Legislature that ultimately governs this case, and that SSA and CSAC contend is most appropriate. The amici curiae briefs by CLC and CDTC espouse policy positions not supported by the statutory language or legislative history. Their arguments should be directed to the legislative branch. Moreover, these arguments pay too little heed to the children languishing in California's child welfare system who need to progress forward toward timely legal permanency because they cannot return home to parents who, despite having received the statutory minimum of reasonable reunification services, have not been able or willing to provide a safe home for their children.

This Court should reject amici CLC and CDTC's arguments, adopt amicus CSAC's arguments, and affirm that juvenile courts are not required to automatically extend reunification efforts beyond the 18-month review when a parent or legal guardian has not received reasonable reunification services in the immediately preceding review period. The Legislature has authorized courts to extend reunification services at the 18-month review only under certain limited circumstances specified in section 366.22, subdivision (b), none of which are present in the underlying case, or

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pursuant to a discretionary rather than a mandatory determination under section 352.

Dated: July 21, 2022

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On **July 21, 2022**, I e-filed the foregoing **ANSWER TO AMICI CURIAE BRIEFS FILED BY CHILDREN'S LAW CENTER OF CALIFORNIA, CHILDREN'S LEGAL SERVICES OF SAN DIEGO, AND DEPENDENCY LEGAL SERVICES; CALIFORNIA DEPENDENCY TRIAL COUNSEL; AND CALIFORNIA STATE ASSOCIATION OF COUNTIES** through ImageSoft's TrueFiling system in the Supreme Court of the State of California, with service on the parties to this action in the following manner:

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EXECUTED July 21, 2022, in Santa Ana, California.

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