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9  
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 IN AND FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

12 ALLIANCE OF LOS ANGELES COUNTY  
PARENTS, an unincorporated association,

13  
14 Petitioner and Plaintiff,

15 v.

16 COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC HEALTH;  
MUNTU DAVIS, in his official capacity as  
17 Health Officer for the County of Los Angeles;  
BARBARA FERRER, in her  
18 official capacity as Director of the County of  
Los Angeles Department of Public Health; and  
19 DOES 1 through 25, inclusive,

20 Respondents and Defendants.

Case No. 22STCP02772

Assigned for All Purposes to:  
Hon. William F. Fahey, Dep't 69

**DEFENDANTS COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH'S, MUNTU DAVIS, M.D.'S, AND BARBARA FERRER, PH.D, MPH, M.ED'S REPLY IN SUPPORT OF MOTION TO DISMISS FOR LACK OF STANDING OR, IN THE ALTERNATIVE, TO BIFURCATE, SUBMITTED IN RESPONSE TO PLAINTIFF'S OPPOSITION BRIEF**

*[Declaration of Kent R. Raygor filed concurrently herewith]*

Hearing

Date: September 18, 2023  
Time: 9:30 a.m.  
Dep't: 69

Petition Filed: July 26, 2022  
Verified FAP filed: January 13, 2023  
FSC: October 4, 2023  
Trial Date: October 16, 2023

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**I.**

**INTRODUCTION**

Plaintiff Alliance does not dispute the substance of LACDPH’s motion to dismiss for lack of standing or, in the alternative, bifurcate. Alliance in opposition offers no evidence that its members share a common purpose and function as a group, such that fairness dictates recognition of Alliance as an unincorporated association. In fact, Alliance concedes that the only “group” activity it performs is carried out by its counsel, Julie A. Hamill. This is insufficient to carry Alliance’s burden of establishing jurisdiction to proceed with this lawsuit as an unincorporated association.

Alliance’s opposition instead raises points that are irrelevant to the legal issues addressed by the Motion. Alliance alleges that LACDPH harassed Alliance’s members, did not conduct its own discovery diligently, and broke agreements regarding motions to compel. These arguments are as false as they are irrelevant. There is no evidence at all of “harassment”—simply using the word does not make it so. Nor was LACDPH dilatory in its own discovery. LACDPH sought evidence of Alliance’s membership in March. It is now September, and Alliance has provided the names only of four purported founding members, choosing instead to stand on objections. Finally, the alleged agreement claimed by Alliance to put off issues related to the identification of Alliance’s members until after summary judgment does not exist. The e-mails upon which Alliance relies do not even include the words “summary judgment” and were exchanged weeks before LACDPH filed its motion. The parties agreed—as the e-mails make clear—only to put off the deadline to move to compel until after an “informal discovery conference,” which never happened. Alliance’s arguments about discovery issues cannot create jurisdiction where none exists. The Court should dismiss this case for lack of standing.

**II.**

**A MOTION TO DISMISS FOR LACK OF STANDING MAY BE MADE AT ANY TIME**

Alliance asserts that LACDPH’s motion is “procedurally improper” because the Motion is not predicated on a statutory basis. This argument fails as Alliance actually concedes that LACDPH cited authority that holds that a challenge to a court’s subject matter jurisdiction “can be raised at any time by any available procedure.” [Oppo., 1:25-2:2.] Alliance then attempts to downplay that

1 concession by arguing that LACDPH’s Motion does not challenge subject matter jurisdiction. [*Id.*,  
2 2:3-4.] But Alliance misses the point. As stated in the Motion, “contentions based on a lack of  
3 standing ***involve jurisdictional challenges and may be raised at any time in the proceeding.***”  
4 *Associated Bldrs. Contrs. v. S.F. Airport Comm’n* (1999) 21 Cal.4th 352, 361 (emphasis added).

5 The use of this procedural device is particularly appropriate in light of Alliance’s  
6 gamesmanship in this matter. [Motion, 7:14-16:14.] Courts do not condone efforts by parties to  
7 “hide the ball” with their identity in the name of privacy, because “[t]o permit such shenanigans”  
8 would endorse gamesmanship and surprise in litigation. *See Bear Creek Master Assn. v. Edwards*  
9 (2005) 130 Cal.App.4th 1470, 1489 (holding that defendants’ attempts to obfuscate the real party in  
10 interest through “gotcha!” games were improper, and that the plaintiff was “entitled to know the  
11 identity of the defendant”). That is exactly what Alliance has done here. It cannot justify its refusal  
12 to identify its members based on purported fears of invasion of their privacy and harassment of  
13 members by LACDPH. The allegations of invasion of privacy or harassment have no basis in  
14 reality, and have no bearing on the motion—except to further demonstrate Alliance’s repeated  
15 gamesmanship. It claims to exist as an unincorporated association, which requires its members to  
16 engage in collective action, but it simultaneously refuses to disclose its membership. While the  
17 French Resistance existed in secrecy, it also never attempted to file a public lawsuit in a jurisdiction  
18 that requires a plaintiff to establish standing.

19 Alliance claims that the contention that it is not a legal entity is wholly distinct from whether  
20 it has standing to sue. [Oppo., 2:3-4.] But Alliance then concedes that an unincorporated  
21 association only has standing to sue ***on behalf of its members.*** [Oppo., 11:20-27.] If Alliance does  
22 not exist, then it cannot sue on behalf of its members. [*See* Motion, 16:18-17:10.] Any other  
23 conclusion would render any representative standing analysis a nullity and foreclose, as Alliance  
24 tries to do here, any attempt to determine whether a nonexistent entity represents or can represent  
25 the rights of its purported members.

26 Additionally, Alliance attempts to dodge the consequences of the testimony of its PMQ  
27 witness, Roxanne Hoge, claiming that the Motion “appears to be either a backwards attempt at a  
28 discovery motion or a motion for judgment on the pleadings in disguise, improperly relying on

1 extrinsic evidence outside the face of the pleadings.” [Oppo., 2:5-12.] Alliance claims that relying  
2 on Ms. Hoge’s deposition transcript is improper “extrinsic evidence” that should not be considered.  
3 This argument is meritless because lack of standing and subject matter jurisdiction can be asserted at  
4 any time, and extrinsic evidence is always permitted when challenging jurisdiction. *Great Western*  
5 *Casinos, Inc. v. Morongo Band of Mission Indians* (1999) 74 Cal.App.4th 1407, 1418 (“if subject  
6 matter jurisdiction may be challenged at any time during the course of an action it is logical for the  
7 court to consider all admissible evidence then before it in making its determination — whatever the  
8 procedural posture of the case.”). More importantly, LACDPH does not challenge Alliance’s  
9 pleadings—the Motion is based on admissions made by Alliance’s designated PMQ witness that  
10 show the alleged “unincorporated association” is nothing more than an instrumentality of Alliance’s  
11 attorney, and does not actually function as a group under a common name for any purpose other  
12 than pursuing Ms. Hamill’s personal vendetta.<sup>1</sup>

### 13 III.

#### 14 **ALLIANCE IS NOT AN UNINCORPORATED ASSOCIATION**

##### 15 A. **An Unincorporated Association Must Share A Common Purpose And Function Under** 16 **A Common Name.**

17 As explained in the Motion, under *Founding Members v. Newport Beach* (2003) 109  
18 Cal.App.4th 944, Alliance cannot possibly have standing to sue because the purported “entity” itself  
19 does not exist as an unincorporated association. [Motion, 16:18-18:20.] Alliance asserts that  
20 *Founding Members* is inapposite because it did not decide whether the plaintiff had standing to sue,  
21 but rather found that the purported plaintiff entity did not exist. [Oppo., 3:2-13.] This argument  
22 misunderstands *Founding Members* and irrationally posits that if a plaintiff does not exist it still  
23 could somehow have standing to sue. The Court in *Founding Members* held that the purported  
24 plaintiff was not an unincorporated association. And Alliance ignores that standing was, indeed, at  
25

26 <sup>1</sup> Alliance asserts that other witnesses were available for deposition, attempting to undermine Ms.  
27 Hoge’s sworn testimony. [Oppo., 11:5-18.] That is irrelevant. Alliance designated Ms. Hoge as its  
28 PMQ witness and bore the obligation of making sure she was qualified to testify on behalf of  
Alliance on the designated testimony categories. As a result, Ms. Hoge’s testimony reflects  
Alliance’s position in this matter. The fact that other persons also could have been deposed does not  
nullify or negate the statements and admissions Alliance has already made through Ms. Hoge.

1 issue in *Founding Members*. *See id.* at 952. But the court never had to reach the issue because it  
2 determined that the purported plaintiff did not exist as any type of organization—not even as an  
3 unincorporated association. *Id.* at 963-64. Moreover, Alliance concedes that the test applied in  
4 *Founding Members*—whether the unincorporated association’s members share a common purpose  
5 and function under a common name—is the applicable test to determine whether an unincorporated  
6 association exists such that it has a right to sue. [Oppo., 4:3-18.] Accordingly, *Founding Members*  
7 is squarely on point, and dictates dismissal of Alliance’s remaining claims in this action for lack of  
8 standing.

9 Alliance asserts that *People ex rel. Reisig v. Acuna* (2017) 9 Cal.App.5th 1, demands denial  
10 of the Motion because it held that a gang could be enjoined from activity as an unincorporated  
11 association because members were not formally accepted into the gang. [Oppo., 4:19-24.]  
12 Although *Acuna* stated that there was no authority imposing “any specific requirements as the *sine*  
13 *qua non* of an unincorporated association,” the court still applied the test from *Founding Members*  
14 because it found that the gang members “share[d] a common purpose and function[ed] under a  
15 common name under circumstances where fairness requires the group be recognized as a legal  
16 entity.” *Acuna*, 9 Cal.App.5th at 41. Here, and as shown in the Motion and not rebutted in  
17 Alliance’s opposition, Alliance does not appear to have members who share a common purpose or  
18 function under a common name such that fairness would require recognizing it as a legal entity.

19 Alliance attempts to rely on cases analyzing standing to challenge election laws to import a  
20 public interest prong into the associational standing test. [Oppo., 12:24-25 (“The issues in this case  
21 are unquestionably of a *public nature*, and therefore the right to sue is greatly relaxed.”) (emphasis  
22 added).] But that public interest analysis does not apply to any and all situations—it only applies in  
23 cases dealing with *election* challenges. *Vosburg v. Cnty. of Fresno* (2020) 54 Cal.App.5th 439  
24 (applying associational standing principles “to election contests” and incorporating the public  
25 interest analysis). Alliance concedes here that it is not contesting an election. [Oppo., 12:20.]  
26 Moreover, even under *Vosburg*, the discussion of the public interest analysis is preceded by the term  
27 “and,” which suggests that public interest, standing alone, cannot give an unincorporated association  
28 standing where it otherwise would not. 54 Cal.App.5th at 454 (“Adapting the foregoing principles

1 to *election contests*, we conclude an unincorporated association has standing to appear *in an*  
2 *election contest* as a representative of its members if (1) its members live in the area affected by the  
3 outcome of the election, (2) its members would suffer injury from an adverse outcome in the  
4 election contest, *and* (3) the questions involved were of a public nature.”) (emphasis added).

5 **Alliance’s Purported Members Do Not Have A Common Purpose Or Function Under**  
6 **A Common Name.**

7 Alliance asserts that Ms. Hoge’s testimony supports a finding that Alliance’s members share  
8 a common purpose and function under a common name. [Oppo., 8:10-11:3.] After repeating much  
9 of the testimony cited in the Motion, Alliance asserts that its common purpose relates solely to *mask*  
10 *mandates* [*id.*, 15-19 (inside the parenthetical).] But mask mandates were the subject of the now  
11 long-dismissed causes of action in this lawsuit, and are not now at issue in the case as it stands  
12 today. Nowhere in its Opposition does Alliance connect this alleged common interest in mask  
13 mandates to its sole remaining free speech claim—an injunction compelling LACDPH to reopen  
14 public commentary on its social media posts. In fact, Alliance even concedes that its free speech  
15 claim is not an organizational interest, but instead is brought in the *public* interest—*i.e.*, not for any  
16 reason related to Alliance’s sole alleged organizational purpose relating to mask mandates. [Oppo.,  
17 12:8-13.] Ms. Hamill even highlighted that point during the March 27, 2023 Case Management  
18 Conference before this Court:

19 “And *we are litigating on behalf of members of the public* to change policy to  
20 protect *the public* and its First Amendment and the right to free speech protected  
under the California Constitution.”

21 [*Declaration of Kent R. Raygor* (“**Raygor Decl.**”) ¶ 2, and **Exhibit K** thereto (the 3.27.2023  
22 Hearing Transcript), at 12:13-16 (emphasis added).]

23 Moreover, Alliance concedes that only its counsel, Ms. Hamill, could identify Alliance’s  
24 members. [Oppo., 10:20-23.] Alliance fails to explain how its members “mutually consent” to  
25 association with each other when Alliance’s counsel is the only person who knows that anyone is a  
26 member. This concession undermines any claim that its members share any common purpose or  
27 function as a group such that fairness dictates recognition of Alliance as an unincorporated  
28 association.



1 Specifically, Alliance asserts that its “group” function consists of advocacy and litigation by  
2 Ms. Hamill. [Oppo., 10:25-26.] Then, Alliance finally concedes that Ms. Hamill publicly  
3 represents that she founded the organization. [*Id.* 10:26-11:2.] Earlier, however, Ms. Hamill misled  
4 the Court when she responded to the Court’s direct question on this point during the March 27, 2023  
5 Case Management Conference:

6 “The Court: And is there a titular head of this Alliance?

7 Attorney Hamill: ***There are founding members*** of the Alliance . . . .

8 The Court: Well, I mean there has to be a first among equals, is there not?

9 Attorney Hamill: There are – ***there are founding members*** who have more voice.

10 But there are limitless – ***we’re not exclusive to anyone*** who wishes  
to join the Alliance of Parents . . . .

11 The Court: Founding members – how many of those are there?

12 Ms. Hamill: As described in the petition, we have one founding member who  
signs the verification. But there are multiple founding members.”

13 [Raygor Decl. ¶ 2, and **Exhibit K** thereto (the 3.27.2023 Hearing Transcript), at 5:4-6:4 (emphasis  
14 added).] In its Opposition, Alliance attempts to downplay Ms. Hamill’s self-described status as a  
15 founder by claiming Ms. Hamill merely helped “launch” Alliance’s campaigns. [Oppo., 10:26-  
16 11:3.] But Ms. Hamill’s involvement goes far beyond that. In her own personal website, she states:

17 “***I founded the Alliance of Los Angeles County Parents*** [[link to Alliance’s website](#)]  
18 to fight for children via legislative advocacy and litigation. ***Through the Alliance***  
19 and through my own personal volunteer work, ***I use my voice to advocate for***  
20 ***children . . . .***”

21 [Raygor Decl. ¶ 3, and **Exhibit L** thereto (www.hamill4pv.com) (emphasis added).] And, just a few  
22 weeks before filing this lawsuit, Ms. Hamill co-signed a June 21, 2022 letter to the White House and  
23 the CDC in her role as a supposed member of Alliance – signed as “Julie Hamill & Sarah Beth  
24 Burwick, Alliance of Los Angeles County Parents, Parent Organization” – belying the assertion that  
25 she only helped “launch” Alliance’s campaigns. [Raygor Decl. ¶ 4, and **Exhibit M** thereto.]

26 Viewed in context, it seems that everything Alliance does as a purported group simply  
27 consists of Ms. Hamill’s own advocacy and litigation. One person who individually interacts with a  
28 number of people does not, by that interaction, turn that group of people into an association with a  
common purpose under a common name. And certainly the single activity engaged in here by  
Alliance—prosecuting this lawsuit—cannot show that Alliance “functions as a group.” Under  
Alliance’s theory, any person’s mere network of contacts would be an unincorporated association

1 and would have standing to sue, whether such contacts in that network authorized such filing and  
2 subsequent prosecution or not. That cannot, and is not, sufficient for standing and subject matter  
3 jurisdiction purposes. And the testimony of Alliance’s designated PMQ witness, Ms. Hoge, shows  
4 that the purported membership merely consists of some group of Ms. Hamill’s personal contacts:  
5 Ms. Hoge (testifying as Alliance) was aware of no membership meetings, did not know if anyone  
6 has the ability to authorize the filing of the lawsuit signed by Ms. Hamill, and did not know if any of  
7 the demand letters and draft petition for writ of mandate signed by Ms. Hamill and sent to  
8 LACDPH, or any of the settlement demands sent to LACDPH by Ms. Hamill, had ever been shown  
9 to or approved by the membership, or whether any member dissented. [Motion, 15:10-16:14.] And  
10 beyond that, Ms. Hamill instructed her not to further answer. [*Id.*, 16:10-14.]

11 The fact that Alliance’s counsel founded the organization strongly suggests that she, herself,  
12 is the real party in interest in this litigation. Alliance is merely a front for its counsel’s interests, and  
13 is not a genuine unincorporated association.

14 **C. Alliance’s Allegations Of Malfeasance Cannot Create Standing Where None Exists,**  
15 **And In Any Event Are False.**

16 Alliance makes a number of false allegations of misconduct by LACDPH in opposition to  
17 LACDPH’s motion to dismiss. Alliance does not explain how these allegations pertain to whether it  
18 has standing because Alliance cannot do so. In any event, the alleged misconduct has no bearing on  
19 whether Alliance functions as an organization. LACDPH will not burden the Court with a line-by-  
20 line refutation of all of these false allegations and claims, but rather hits the proverbial highlights:  
21 Alliance’s claims that LACDPH (1) harassed and intimidated Ms. Hamill, (2) harassed and  
22 intimidated Ms. Hoge, and (3) reneged on an agreement to table identification of Alliance’s  
23 membership until after summary judgment.

24 *First*, Alliance claims that LACDPH harassed and intimidated Ms. Hamill by using a copy of  
25 Ms. Hamill’s public website ([www.hamill4pv.com](http://www.hamill4pv.com)) from her schoolboard campaign, in which Ms.  
26 Hamill herself publicly featured her children, as an exhibit in the PMQ deposition and in this  
27 Motion. [Oppo., 7:19-8:4.] This is the same website quoted above [Raygor Decl. ¶ 3, and **Exhibit**  
28 **L** thereto] in which Ms. Hamill stated that she is the one who “founded” Alliance and that she uses

1 Alliance to advocate her positions, which is relevant for the reasons noted above. When Ms. Hamill  
2 complained that her children appeared in the exhibit (notwithstanding the fact that it was her own  
3 public website), counsel for LACDPH agreed to redact the exhibit, which it did. LACDPH,  
4 however, inadvertently did not redact one photo when it filed this motion because it did not know  
5 that the child depicted was Ms. Hamill’s son. When Ms. Hamill brought that to counsel’s attention,  
6 LACDPH submitted a replacement exhibit with further redactions to the Court on September 7,  
7 2023.<sup>2</sup> [Raygor Decl. ¶ 3, and **Exhibit L** thereto.] The use of relevant, public information in a court  
8 proceeding, redacted per Ms. Hamill’s request, cannot and does not constitute harassment or  
9 intimidation of Ms. Hamill.

10 *Second*, Alliance claims that LACDPH harassed and intimidated Alliance’s PMQ witness,  
11 Ms. Hoge, because counsel asked her at the Alliance PMQ deposition about an address that  
12 appeared on paperwork filed by a limited liability company (Three Spear Productions, LLC) with  
13 the California Secretary of State. [See *Oppo.*, 7:16-18.] Ms. Hoge had identified that company on  
14 her LinkedIn page (<https://www.linkedin.com/in/roxanne-hoge-42323193>) [Raygor Decl. ¶ 5, and  
15 **Exhibit N** thereto], and counsel for LACDPH then found its *Statement of Information* on the  
16 publicly available Secretary of State website [Raygor Decl. ¶ 6, and **Exhibit O** thereto]. LACDPH  
17 did not know what this address was—it simply asked about it at the deposition of Ms. Hoge based  
18 on publicly available data—and only found out at the deposition that Ms. Hoge did not want that  
19 address disclosed. [Raygor Decl. ¶ 6.] Asking a question about a publicly filed document about a  
20 production company Ms. Hoge publicly identified in her resumé cannot possibly be considered  
21 harassment or intimidation of Ms. Hoge.

22 *Third*, Alliance claims that LACDPH reneged an on agreement “that disputed discovery  
23 issues would be handled via informal discovery conference following disposition of the summary  
24 judgment motion.” [*Oppo.*, 4:27-5:24.] Alliance points to two e-mails from LACDPH’s counsel to  
25 Ms. Hamill dated May 12 and May 26, 2023 as evidence of this alleged agreement, but does not  
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27 <sup>2</sup> On September 6, 2023, Ms. Hamill sent LACDPH by e-mail a “24 Hour Notice” demanding that  
28 LACDPH file a motion to seal the exhibit. Of course, LACDPH could not ask the Court to seal  
material that Ms. Hamill had already published on a public website. See CALIFORNIA RULE OF  
COURT 2.550.

1 quote from those e-mails, and with good reason—the words “summary judgment” do not appear  
2 anywhere in them (nor does the more colloquial “MSJ”). [Raygor Decl. ¶¶ 7 and 8, and Exhibits P  
3 and Q thereto.] When Ms. Hamill received those e-mails—in which LACDPH’s counsel agreed to  
4 continue the motion to compel deadline until after an informal discovery conference, which never  
5 happened—she did not say anything about an missing alleged agreement regarding summary  
6 judgment. This is not surprising, because there was no such agreement. The discussion between  
7 counsel occurred weeks before LACDPH filed its motion for summary judgment on June 14, 2023.

8 Ms. Hamill’s false accusations of improper conduct by LACDPH are irrelevant to the  
9 standing issued addressed in this Motion, lack any merit, and cannot give standing to a plaintiff that  
10 otherwise lacks it.

#### 11 IV.

#### 12 **BIFURCATION IN THE ALTERNATIVE TO DISMISSAL WOULD PRESERVE** 13 **JUDICIAL ECONOMY**

14 If the Court determines that a hearing is necessary to decide whether Alliance has standing,  
15 then bifurcation of trial is appropriate and would serve judicial economy. [Motion, 18:22-19:15.]  
16 Alliance asserts that the “same witnesses” who will testify as to standing will also testify on the  
17 remaining issues in this case, and thus, bifurcation does not preserve judicial economy. [Oppo.,  
18 2:14-27.] Alliance offers no positive authority in support of its position, and only attempts to  
19 distinguish cases cited by LACDPH—which hold that standing is most efficiently resolved at the  
20 earliest possible time [Motion, 18:24-19:15]—as inapposite. [Oppo., 2:13-27.] If Alliance cannot  
21 bring these claims because it does not have any legal existence, then no other evidence need be  
22 heard, and there is no reason to waste hours or days at trial hearing irrelevant testimony.

#### 23 V.

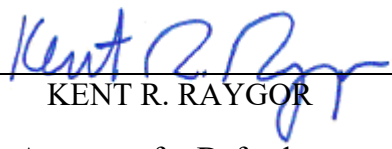
#### 24 **CONCLUSION**

25 For all of the foregoing reasons, LACDPH respectfully requests that this Court dismiss  
26 Alliance’s *First Amended Petition* for lack of subject matter jurisdiction due to lack of  
27 organizational standing or, in the alternative, issue an order bifurcating trial on the issue of standing,  
28 first, before a trial on the merits.

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Dated: September 11, 2023

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By   
\_\_\_\_\_

KENT R. RAYGOR

Attorneys for Defendants  
COUNTY OF LOS ANGELES DEPARTMENT OF  
PUBLIC HEALTH, MUNTU DAVIS, M.D., and  
BARBARA FERRER, Ph.D., MPH, M.Ed

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PROOF OF SERVICE

**Alliance of Los Angeles County Parents v. County of Los Angeles, et al.  
Case No. 22STCP02772**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 1901 Avenue of the Stars, Suite 1600, Los Angeles, CA 90067-6055.

On September 11, 2023, I served true copies of the following document(s) described as **DEFENDANTS COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH’S, MUNTU DAVIS, M.D.’S, AND BARBARA FERRER, PH.D, MPH, M.ED’S REPLY IN SUPPORT OF MOTION TO DISMISS FOR LACK OF STANDING OR, IN THE ALTERNATIVE, TO BIFURCATE, SUBMITTED IN RESPONSE TO PLAINTIFF’S OPPOSITION BRIEF** on the interested parties in this action as follows:  
**SEE ATTACHED SERVICE LIST**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address lchu@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on September 11, 2023, at Los Angeles, California.

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Lily Young Chu

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COUNTY PARENTS