

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

<p><b>In re A.R.</b>, A Person Coming Under the Juvenile Court Law.</p> <hr/> <p><b>ALAMEDA COUNTY SOCIAL SERVICES AGENCY,</b> Petitioner and Respondent, vs. <b>M.B.</b>, Objector and Appellant.</p>
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**S260928**

(Court of Appeal  
No. A158143)

Alameda Superior  
Court No. JD-  
028398-02

MINOR'S CONSOLIDATED REPLY TO  
AMICI CURIAE BRIEFS

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After the Unpublished Order by the First District Court of  
Appeal, Division One, Filed on January 21, 2020  
Affirming an Order of the Superior Court of Alameda County  
Superior Court, Honorable Charles Smiley, III

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IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

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**ALAMEDA COUNTY SOCIAL  
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**M.B.,**

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**MINOR'S CONSOLIDATED REPLY TO  
AMICI CURIAE BRIEFS**

**INTRODUCTION**

Minor submits this consolidated answer to the three amici curiae briefs filed in support of Appellant. All amici curiae argue for an expansion of the criminal law constructive filing doctrine to allow a parent whose parental rights have been terminated to assert a claim of ineffective assistance of counsel for the failure to timely file a notice of appeal. But all three do so by relegating the minors' rights and minimizing the harm that even a day of delay could cause. The minor's paramount right to a permanent and stable home precludes application of the constructive filing doctrine following a final order terminating parental rights.

**I. A Parent Does Not Have the Right to Challenge Her Counsel's Failure to File a Timely Notice of Appeal from an Order Terminating Parental Rights.**

In Minor's opening brief, she demonstrated that by the time parental rights are terminated, the minor's statutory and due process right to a permanent and stable home prevails over the rights of the parent. (MB 19-33.)<sup>1</sup> This conclusion was informed by California's public policy to promote child welfare and took into account the parents' substantive and procedural rights throughout the dependency process. (See *In re Kristin H.* (1996) 46 Cal.App.4th 1635, 1664 [post-termination, the interests of the child may prevail]; *Adoption of Alexander S.* (1988) 44 Cal.3d 857, 868 [sound public policy precludes collateral attacks on final adoption order]; *Cynthia D. v. Superior Court* (1993) 5 Cal.4th 242, 255-256 [the number and quality of required judicial findings pre-termination help assure a proper finding at the termination stage]; *In re Zeth S.* (2003) 31 Cal.4th 396, 410-411 [precise and demanding substantive and procedural requirements are necessary before termination can be proposed]; *In re Arturo A.* (1992) 8 Cal.App.4th 229, 239 [the parents' rights are at their highest before the termination hearing is set].)

This preclusion on a post final judgment claim of ineffective assistance of counsel is consistent with the existing limitation on a parents' statutory right to competent counsel. (See *Welf. & Inst.*

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<sup>1</sup> Minor's Opening Brief on the Merits will be referenced herein by, "MB."

Code, § 317.5; see also MB 20-23; see also *Kristin H.*, *supra*, 46 Cal.App.4th at pp. 1661-1662, 1667.) It is also consistent under principles of due process. (See e.g. *Arturo A.*, *supra*, 8 Cal.App.4th at p. 838.) Although a parent is not constitutionally guaranteed the right to competent counsel, which is assessed on a case-by-case basis (*Lassiter v. Department of Social Services* (1981) 452 U.S. 18, 31-32), when a parent has such a right, the balancing of the interests also precludes a parents' relief. (See MB 19-33; see also *Arturo A.*, *supra*, 8 Cal.App.4th at p. 838.) Minor does not dismiss the parents' rights, but the proper analysis requires a balancing of the parties' interests and the balance unequivocally tips in the minor's favor following the termination of parental rights without a timely notice of appeal. (See *Kristin H.*, *supra*, 46 Cal.App.4th at p. 1664 [following the termination of parental rights the point may have been reached "at which the child's interest in finality prevails"]; see also *Arturo A.*, *supra*, 8 Cal.App.4th at p. 241; see also MB 23.)

In their briefing, the amici curiae inadequately address the weight of the minor's rights following the termination of parental rights. Indeed, they appear to minimize the impact on the minor as one of time and not substance. (California Academy of Appellate Lawyers Brief at p. 17; Commission on Access to Justice Brief at pp. 17-19; California Appellate Projects Brief at p. 38-39.)<sup>2</sup> While all three offer perspectives on the proper method

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<sup>2</sup> For consistency, Minor follows the abbreviations used by Respondent in its consolidated Answer to the three Amici Curiae briefs filed in this case. Accordingly, The Committee of the

for relief from default, none persuasively argue why the minors' rights should not prevail to preclude constructive filing.

In its brief, the California Commission on Access to Justice focuses on the parents' rights, and asks this Court to recognize the "fundamental human interest in parental rights" as a "sufficient condition" for operation of the constructive filing doctrine so long as the parent can show "diligence" under an objective standard. (CAAL Brief at pp. 10-11, 17.) Their brief focuses on the parent's interest in equal access to justice and the right to a "meaningful appeal." (CAAL Brief at pp. 17-18) With a similar focus on the nature of the parent and child relationship, the Academy of Appellate Lawyers' brief focuses on the nature of the relationship between parent and child arguing that if a parent can show diligence, then constructive filing should be permitted following the termination of parental rights. (CAAL Brief at pp. 9-11, 16.) Finally, although the Appellate Projects brief takes a slightly different approach promoting a set of criteria to be assessed on a case-by-case basis (CAP Brief at pp. 25-26), they do not adequately address the substantive rights of the minor. (See e.g. CAL Brief at p. 14.) Instead, they argue that their suggested protocol will balance the interests of the parties, that the quantity of potential cases is relevant to the issue, that the revisions to the dependency process adequately deal with the

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California Commission on Access to Justice brief will be identified as "CCCAJ Brief," the California Academy of Appellate Lawyers' brief will be identified as the "CAAL Brief," and the California Appellate Projects' brief will be identified as the "CAP Brief."



problem of delay, and, in any event, that a few days of delay does not harm a four-year old child. (CAL Brief at pp. 27-35.) Minor respectfully disagrees with these perspectives because they do not persuasively justify a violation of the minor's right to permanence and stability.

As the California Appellate Projects brief acknowledges, under statutory and constitutional law principles, the requisite analysis for determining the scope for the ability to raise the ineffective assistance of counsel requires balancing the parties' relative interests, which will "resolv[e] the tension between the minor's and the parent's interests in dependency cases." (CAL at p. 32, referencing *In re Marilyn H.* (1993) 5 Cal.App.4th 295, 302-30.) Minor agrees. Both by statute and under principles of due process there is no right to assert the ineffective assistance of counsel for the failure to file a timely notice of appeal following the termination of parental rights. (See MBM 20-23 [parents have a limited right to the effective assistance of counsel in dependency proceedings].)

The balancing of the parties' interests includes giving due consideration to the parents' liberty interest in the "care, custody, and management of their child," the "derivative" liberty interest in the "accuracy and justice" of the appealed from order, and the numerous substantive rights provided to parents during dependency proceedings up to and including at the section 366.26 hearing. (See *Santosky v. Kramer* (1982) 455 U.S. 745, 753; see also *Cynthia D.*, *supra*, 5 Cal.4th at pp. 255-256; Welf. & Inst. Code, §§ 361.5, subds. (a) & (b), 366.21, subds. (e) & (f); MBM

24-25.)

But the parents' rights and interests must not prevail over the minors' following the termination of parental rights; by that stage the weight of their rights have diminished to the point that the minor's rights are paramount. (See *Cynthia D.*, *supra*, 5 Cal.4th at pp. 255-256; see also MBM 19-33.) While it is true that the minor has a liberty interest in the accuracy of the judgment, that interest is "derivative" and adequately protected by the minor's own right to appeal within the jurisdictional window. (*Santosky v. Kramer*, *supra*, 455 U.S. at p. 753; see also *Marilyn H.*, *supra*, 5 Cal.4th at p. 306) A minor's fundamental rights include the right to be free from neglect, to "have a placement that is stable [and] permanent" and, by the time parental rights are terminated, they have attained the "right to a settled life." (*Ibid.*; *Arturo A.*, *supra*, 8 Cal.App.4th at p. 241.) This case concerns the weight of the interests once the termination order has become final. It is at that point, if not before, that the minors' interests supersede all others.

Law and precedent support this conclusion. "The Legislature has defined the best interests of children in dependency proceedings along a statutory continuum." (*In re Elizabeth R.* (1995) 35 Cal.App.4th 1774, 1787.) "Family preservation, with the attendant reunification plan and reunification services, is the first priority when child dependency proceedings are commenced." (*Ibid.*) Accordingly, a parent's rights are at their highest at the pre-termination stages. (See *Arturo A.*, *supra*, 8 Cal.App.4th at p. 238.) But once reunification services

are terminated, and thus well before the termination hearing, the parents' rights are relegated and the focus changes "to provide the dependent children with stable, permanent homes."

(*Elizabeth R.*, *supra*, 35 Cal.App.4th at p. 1787, citing *In re Michael R.* (1992) 5 Cal.App.4th 687, 695-696.) As has been said, because of this, the later decision at the permanency hearing to terminate parental rights "will be relatively automatic." (*Arturo A.*, *supra*, 8 Cal.App.4th at p. 239.)

To be clear, Minor is not advocating a wholesale preclusion on the use of constructive filing following the termination of parental rights. (See e.g., CAP Brief at pp. 15, 32 [Minor and Respondent advocate a bright-line rule]; CCCAJ Brief at p. 17 [Minor seeks a total preclusion in termination cases].) There are limited circumstances where such a procedure is permitted by statute and court rule. (See MRB 14-15.)<sup>3</sup> If Minor is advocating a bright-line rule, it is this: given the weight of the relative interests, there can be no right for a parent to assert a claim of ineffective assistance of counsel following a final order terminating parental rights. (See MBM 20-33.)

Each of the Amici Curiae tend to dismiss the minor's position as one concerning only time and not minor's substantive rights. (See CAAL Brief at pp. 17-18; CAL 32-39; CCCAJ Brief at pp. 17-18.) For example, the California Appellate Projects brief argues that any concern with delay is alleviated due to the

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<sup>3</sup> Minor's Reply Brief on the Merits will be referenced herein by, "MBM."

changes made by the Legislature to the dependency scheme. (CAL Brief at p. 32.) But the juvenile dependency system's evolution toward expediency furthers minor's position. The clear intent of the Legislature is to expedite finality. (*In re Celine R.* (2003) 31 Cal.4th 45, 59.) As the California Appellate Projects' brief described, "[o]ver the past 34 years, the Legislature has designed, revised, and amended the juvenile court to protect the minor's interests, particularly, to eliminate delay and facilitate permanency as soon as possible. (CAL Brief at p. 32, referencing *Marilyn H., supra*, 5 Cal.App.4th at pp. 302-303.) Indeed so, and this Court must not undo that trajectory. As Respondent notes, if the Legislature wanted to allow constructive filing or "constructive jurisdiction" (CAL Brief at p. 14), it could have made that plain in its revisions. (See Respondent's Consolidated Answer to Amici Curiae at p. 13.)

But there is also the issue of due process. If the current dependency scheme is designed for expedited resolution, and the system has evolved to further reduce delay, then the minors' due process right to permanence and stability has necessarily become more robust, not less.

As a final point, neither amici curiae, nor indeed Appellant, speak to the practical effect of even a day of delay. Rather, they attempt to minimize that aspect. Minor hopes this case sheds some light on why delay of any duration has a real practical effect on at least one party: the minor. In this case, that is A.R.

A.R. was born on July 26, 2016 and thus recently passed her fourth birthday. (1OCT 4.) She has not lived with her mother

since she was fourteen months old. (1OCT 104, 118-119.) A.R.'s initial removal was due to allegations that Appellant's mental health concerns negatively impacted the ability to care for A.R. (1OCT 6.) Appellant was provided both family maintenance and family reunification services. (1OCT 104, 118-119; 1CT 33-34, 85.) It was during these months, that Appellant's rights as a parent were at their highest. (See e.g. *Arturo A.*, *supra*, 8 Cal.App.4th at p. 239.) But on October 17, 2018, Appellant's failure to enroll in the case plan required parenting classes, inconsistent participation in her joint therapy with A.R., and ongoing issues with the visitation schedule (1CT 85) led the juvenile court to terminate reunification services and set the section 366.26 hearing. (6/2/19 RT 9-10.) At this point, the weight of Appellant's substantive rights began their downward trajectory.

The first section 366.26 hearing was scheduled for February 6, 2019. (1CT 181.) A.R. was then two years and half years old and had been living with her prospective adoptive parent for over a year. The Agency's reports describe A.R.'s development delays and ongoing attachment issues caused by the uncertainty over her situation. (1CT 193.) The reports of A.R.'s behavior during this time demonstrate her difficulties with transitions from Appellant's visits to her prospective adoptive home on a day-by-day basis. (2CT 404) For example, it took A.R. days to return to her normal behavior following a disruptive visit with her mother. (2CT 404.) It is this type of impact – measured in days and not weeks or months – that application of the constructive filing doctrine post final termination order would

exacerbate.

On June 12, 2019, eight months after reunification services were terminated, the juvenile court terminated Appellant's parental rights. (6/12/19 RT 9-10.) At this stage, A.R.'s statutory and due process right to a permanent and stable home took precedence subject only to Appellant's remaining "derivative" interests in the accuracy of the judgment and her statutory right of appeal. (See *In re Andrew B.* (1995) 40 Cal.App.4th 825, 852, overruled on other grounds by *In re Sade C.* (1996) 13 Cal.4th 952.) Any remaining weight attributed to Appellant's interests ended when no timely appeal was filed.

Today is November 13, 2020; A.R. is four years and three months old. The record shows her adoption is ready to be finalized. (2CT 492-493) But she is waiting. As Respondent notes in her answer, the period post-termination is filled with social worker meetings, and other logistical requirements. (See Respondent's Consolidated Answer to Amici Curiae at pp.11-12.) While it is certainly possible to shelter A.R. from some of those, by design they will require A.R.'s involvement to assess her development and her progress. Perhaps most critically, while this appeal remains active, A.R.'s prospective adoptive parents cannot guarantee that she will be their daughter permanently. They cannot verbally reassure her that the law recognizes them as her parents. They all must wait for that conversation. It seems obvious that any child would yearn for the reassurance that their caregivers are not going away and that she is an integral and permanent part of the family. Every day that goes by, however, is

another day where that reassurance cannot occur.

It appears prudent to point out that the delay will never be a matter of days. It will be the number of days the notice of appeal is late, plus the number of days it takes the Court of Appeal court to rule on the Benoit-style motion, then an additional 30 days to file the Appellant's Opening Brief, plus another 30 days to file the Respondent's Brief, then another 20 days to file the Appellant's Reply Brief, and then, assuming there is no oral argument requested, the time it takes for the Court of Appeal to issue its decision. (See Cal. Rules of Court, rules 8.412 & 8.416.) But that is not all. The non-prevailing party on appeal has the right to petition this Court for review. (Cal. Rules of Court, rule 8.500.) Thus, there may be a delay of a further 40 days to file a petition for review, and the time it might then take for the review petition to be either granted or denied, and the remittitur to issue. Conservatively, even allowing constructive filing where a notice of appeal is only one day late, finality will be postponed by at least a year.

The minor's rights are not just theoretical and do not turn on the age of the child, the number of potential cases impacted by a closed-door policy, or the number of days since a parental termination order has become final. These rights are firmly grounded in a public policy that protects the welfare of California's children and must not be undone solely to permit a claim of ineffective assistance of counsel for the failure to timely file an appeal notice.

The right to counsel, whether by statute or under principles of due process, is limited in the dependency scheme. (See MB 20-23.) That limitation precludes relying on ineffective assistance of counsel to resolve a late-filed notice of appeal. That limitation exists out of concern for the minor. A minor that has her own rights that must prevail.

**II. Any Mechanism for Relief from Default Following The Termination of Parental Rights Requires a Heightened Showing of Detrimental Reliance, Diligence, and Prejudice.**

Each of the Amici Curiae propose standards for implementation of a constructive filing, or “constructive jurisdiction,” procedure. (See e.g., CAP Brief at 20- 22 [five-point analysis with minimal prejudice showing where “the passage of time may work against” relief]; CCCAJ Brief at 16-17 [in addition to diligence, advocating an additional “in order to do justice” standard based on parents’ rights]; see also CAAL Brief at pp. 17-18 [*Benoit* standard sufficient].) Minor continues to take no position on the appropriate method should this Court determine that some procedure is proper. But any mechanism must be significantly limited in order to protect the minor’s rights. (See e.g., *In re Isaac J.* (1992) 4 Cal.App.4th 525, 536-543 (dis. opn. of Timlin J. [heightened *Benoit* showing required for dependency].) Minor thus urges this Court to require a heightened showing of diligence and prejudice. (See MB 46-49.)



## CONCLUSION

For the reasons previously stated in Minor's Opening Brief on the Merits and in Minor's Reply Brief on the Merits, Minor respectfully requests that this Court affirm the order dismissing Appellant's appeal.

Dated: November 13, 2020

Respectfully submitted

/s/ Anna L. Stuart

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## CERTIFICATE OF WORD COUNT

I hereby certify that according to the word count function on the software utilized by my computer, ***MINOR'S CONSOLIDATED REPLY TO AMICI CURIAE BRIEFS*** contains 2991 words.

Dated: November 13, 2020

*/s/ Anna L. Stuart*  
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/s/ Priscilla A. O'Harra  
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Supreme Court of California

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