

S265910

**IN THE
SUPREME COURT OF CALIFORNIA**

In re CHRISTOPHER L.,
A Person Coming Under the Juvenile Court Law.

THE LOS ANGELES COUNTY DEPARTMENT OF CHILDREN
AND FAMILY SERVICES,
Plaintiff and Respondent,

v.

CARLOS L.,
Defendant and Appellant.

From a Decision by the Court of Appeal
Second Appellate District, Division One, Case No. B305225
Los Angeles Superior Court Case No. 17CCJP02800B
On Appeal from the Superior Court of Los Angeles County, Honorable
Marguerite D. Downing, Judge Presiding

**RESPONDENT LOS ANGELES COUNTY DEPARTMENT
OF CHILDREN AND FAMILY SERVICES' ANSWER TO
AMICUS BRIEF IN SUPPORT OF APPELLANT FILED BY
THE CALIFORNIA APPELLATE DEFENSE COUNSEL**

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Table Of Contents

	<u>Page</u>
Table Of Authorities	3
Introduction.....	5
Argument.....	5
I. CADC’s Position Fails To Recognize That The Children Who Are The Subjects Of Dependency Proceedings Also Have Important Rights And Interests That Must Be Considered.....	5
II. The Standard Under Which A Claim Of Ineffective Assistance Of Counsel Is Assessed Supports Application Of The Harmless Error Doctrine In the Instant Case.	9
III. Courts Have Not Routinely Applied Structural Error In the Dependency Context. Furthermore, Those That Found Structural Error Predated This Court’s Decision In <i>In re James F.</i> , <i>supra</i> , 42 Cal.4th 901.....	14
Conclusion	17
Certificate Of Word Count Pursuant To Rule 8.360.....	18
Declaration Of Service	19

Table Of Authorities

Page

CASES

<i>Chapman v. California</i> (1967) 386 U.S. 18	12
<i>In re A.D.</i> (2011) 196 Cal.App.4th 1319.....	15
<i>In re A.I.J.</i> (2019) 44 Cal.App.5th 652.....	7
<i>In re Celine R.</i> (2003) 31 Cal.4th 45.....	passim
<i>In re Christopher L.</i> (2020) 56 Cal.App.5th 1172.....	6
<i>In re Dennis H.</i> (2001) 88 Cal.App.4th 94	10
<i>In re J.P.</i> (2017) 15 Cal.App.5th 789	7
<i>In re James F.</i> (2008) 42 Cal.4th 901.....	6, 14, 15
<i>In re Kristin H.</i> (1996) 46 Cal.App.4th 1635	9, 10, 11
<i>In re Marcos G.</i> (2010) 182 Cal.App.4th 369	7
<i>In re N.M.</i> (2008) 161 Cal.App.4th 253.....	10
<i>In re Nada R.</i> (2001) 89 Cal.App.4th 1166.....	10
<i>In re Sabrina H.</i> (2007) 149 Cal.App.4th 1403	15, 16
<i>Judith P. v. Superior Court</i> (2002) 102 Cal.App.4th 535	15
<i>Lassiter v. Dep't of Social Services</i> (1981) 452 U.S. 18	16
<i>People v. Watson</i> (1956) 46 Cal.2d 818	10, 11, 12
<i>Strickland v. Washington</i> (1984) 466 U.S. 668	10

STATUTES

Penal Code, section 2625.....	7
-------------------------------	---

WELFARE AND INSTITUTIONS CODE

Section 317, subd. (b).....	6, 9, 11, 13
Section 317.5	9, 11, 13

Table Of Authorities (Continued)

Page

CONSTITUTIONAL PROVISIONS

California Constitution, article VI, section 13 11

Introduction

Respondent, the Los Angeles County Department of Children and Family (DCFS), submits this brief in answer to the brief (CADC Amicus) the California Appellate Defense Counsel (CADC) filed, as *Amicus Curiae*, in support of Appellant Carlos L. (Father). Respondent incorporates and reaffirms all arguments set forth in its Answer Brief on the Merits. Failure to reply to a particular point raised in the amicus brief filed by CADC is not intended to be deemed a concession or waiver of those points. Rather, Respondent believes the points were adequately addressed in previous briefing.

Argument

I. CADC’s Position Fails To Recognize That The Children Who Are The Subjects Of Dependency Proceedings Also Have Important Rights And Interests That Must Be Considered.

CADC argues that California’s statutory scheme provides parents with significant procedural safeguards, including the right to appointed counsel to represent them in dependency proceedings. (See CADC Amicus, generally.) CADC further argues that in light of these procedural safeguards and protections, failure to appoint an indigent parent with counsel at the jurisdiction and disposition hearings should be deemed structural error. (See CADC Amicus, generally.) Significantly, CADC’s brief is silent with respect to one crucial party and his or her rights and interests: *the child who is the subject of the dependency proceedings*.

DCFS agrees that California’s statutory scheme provides parents with significant and important procedural safeguards

and does not dispute that the appointment of counsel for an indigent parent when out of home placement is at issue is one such safeguard. (Welf. & Inst. Code,¹ § 317, subd. (b).)

However, DCFS does not agree that error in the appointment of counsel at the jurisdiction/disposition stage of the proceedings should be deemed structural when it is amenable to a harmless error analysis. To do so would fail to recognize the unique nature of dependency proceedings and that they not only implicate the rights and interests of parents, but also those of children. Many of these children, like Christopher L., are quite young and have spent their entire childhoods in the dependency system. (*In re Christopher L.* (2020) 56 Cal.App.5th 1172, 1178 [Opinion].)

The fact that dependency proceedings involve and center around a child who has equally important interests and rights at stake cannot be ignored and must be considered when analyzing errors that were clearly beyond the child's control. This is one of the critical differences between criminal and dependency proceedings that this Court has previously recognized and the significance of which cannot be overstated. (*In re James F.* (2008) 42 Cal.4th 901, 915-916, 918; *In re Celine R.* (2003) 31 Cal.4th 45, 59)

When error in not appointing counsel is prejudicial, it will not be deemed harmless and reversal will be warranted. This is the current state of the law. (See *In re J.P.* (2017) 15 Cal.App.5th

¹ All further statutory references are to the Welfare and Institutions code unless otherwise specified.

789, 797-798 [error in not appointing counsel for a mother in advance of a section 388 hearing was prejudicial]; *In re A.I.J.* (2019) 44 Cal.App.5th 652, 673-674 [error in failing to give an incarcerated parent adequate notice of jurisdiction/disposition hearing that resulted in the denial of the right to counsel was not harmless because legal representation would have resulted in a tangible benefit to the parent and significantly altered the course of the proceedings].)

However, when the parent was not prejudiced by a juvenile court's failure to comply with Penal Code section 2625 and/or to appoint counsel at the jurisdiction/disposition stage of the proceedings, there is no miscarriage of justice and the error is harmless. (See *In re Marcos G.* (2010) 182 Cal.App.4th 369, 390-391.) Reversal in these cases would be merely a formality that only serves to further delay a child their right to permanence and stability.

Deeming the type of error that occurred in the instant case structural would fail to recognize that children – arguably the most critical party to any dependency proceeding – also have rights and interests and that their need for permanence and stability cannot be indefinitely put “on-hold” without often causing them great detriment. Their childhoods will proceed with or without them achieving permanence and stability. CADC does not acknowledge Christopher's countervailing interests, much less factor them into its analysis. (See CADC Amicus, generally.)

In *In re Celine R.*, this Court addressed whether it was appropriate to apply the harmless error standard to an alleged failure to appoint separate counsel for siblings with conflicting interests at a hearing at which parental rights of two of the three siblings were terminated. (*In re Celine R.*, *supra*, 31 Cal.4th at pp. 58-62.) This Court held:

We conclude that the failure to appoint separate counsel for separate siblings is subject to the same harmless error standard as error in not appointing counsel for the children at all. We add another reason criminal cases are inapt. In a criminal case, reversal of a criminal judgment is virtually always in the defendant's best interest. The situation in a dependency case is often different. Reversal of an order of adoption, for example, might be contrary to the child's best interest because it would delay and might even prevent the adoption. After reunification efforts have failed, it is not only important to seek an appropriate permanent solution—usually adoption when possible—it is also important to implement that solution reasonably promptly to minimize the time during which the child is in legal limbo. A child has a compelling right to a stable, permanent placement that allows a caretaker to make a full emotional commitment to the child. [Citation.] Courts should strive to give the child this stable, permanent placement, and this full emotional commitment, as promptly as reasonably possible consistent with protecting the parties' rights and making a reasoned decision. The delay an appellate reversal causes might be contrary to, rather than in, the child's best interests. Thus, a reviewing court should not mechanically set aside an adoption order because of error in not giving that child separate counsel; the error must be prejudicial under the proper standard before reversal is appropriate.

(*In re Celine R.*, *supra*, 31 Cal.4th at p. 59.)

The same reasoning is applicable to error in the appointment of counsel with respect to a parent at the jurisdiction/disposition stage of the proceedings and “a reviewing court should not mechanically set aside an adoption order” if the error was not prejudicial. (*In re Celine R.*, *supra*, 31 Cal.4th at p. 59.)

For these reasons, error in the appointment of counsel at the jurisdiction/disposition hearing should be reviewed under a harmless error analysis. This standard of review properly balances the rights and interests of both the parent and the child and recognizes the distinct and critical rights that are at stake in dependency proceedings.

II. The Standard Under Which A Claim Of Ineffective Assistance Of Counsel Is Assessed Supports Application Of The Harmless Error Doctrine In the Instant Case.

CADC acknowledges that a claim of ineffective assistance of counsel requires that the appellant demonstrate prejudice, but argues such a showing should not be required when there is error in appointing counsel at the jurisdiction/disposition stage of the proceedings. (CADC Amicus 18-20.)

As CADC references, indigent parents in dependency proceedings have a statutory right to counsel when out-of-home placement is at issue. (§ 317, subd. (b).) (CADC Amicus 16-17; § 317, subd. (b).) CADC further notes, parents are also entitled to competent counsel (§ 317.5) and to effective assistance of counsel (*In re Kristin H.* (1996) 46 Cal.App.4th 1635, 1659). (CADC Amicus 16-17.)

To show counsel was ineffective, a party must not only demonstrate that counsel's representation was deficient, but also establish that the claimed error was prejudicial, i.e., "that it is 'reasonably probable that a result more favorable to the appealing party would have been reached in the absence of the error.' [Citation.]" (*In re Kristin H.*, *supra*, 46 Cal.App.4th at pp. 1667-1668, quoting from *People v. Watson* (1956) 46 Cal.2d 818, 836.)

Importantly, "[a] court need not evaluate whether counsel's performance was deficient before examining prejudice suffered by defendant." (*In re Nada R.* (2001) 89 Cal.App.4th 1166, 1180, citing *Strickland v. Washington* (1984) 466 U.S. 668, 687.) "Thus, a court may reject a claim if the party fails to [show] that but for trial counsel's failings, the result would have been more favorable to the defendant." (*Ibid.*, citing *Strickland v. Washington*, *supra*, 466 U.S. at p. 694.)

An ineffective assistance of counsel claim may only be reviewed on direct appeal when there is no satisfactory explanation for the trial attorney's decisions. (*In re N.M.* (2008) 161 Cal.App.4th 253, 270, citing *In re Dennis H.* (2001) 88 Cal.App.4th 94, 98, fn. 1.)

Contrary to CADC's position, the fact that a party claiming ineffective assistance of counsel must first make a showing of prejudice *supports* applying the harmless error test to situations where there was error in appointing counsel early in the proceedings. (CADC Amicus 18-20.) It recognizes that absent prejudice, there is no miscarriage of justice and reversal is not

warranted. (Cal. Const., art. VI, § 13.) Significantly, both situations involve a violation of a statutory right to counsel. (*In re Kristin H.*, *supra*, 46 Cal.App.4th at p. 1668; §§ 317, subd. (b), 317.5.) CADC is simply wrong when it asserts that prejudice can never be assessed in situations in which counsel was not appointed at the jurisdiction/disposition stage of the proceedings. (CADC Amicus 18-20.)

In re Kristin H., which CADC cites in support of its position (CADC Amicus, p. 19), also involved alleged error – i.e. ineffective assistance of counsel – at the jurisdiction/disposition stage of dependency proceedings and specifically held that such error was reviewed under the harmless error test (*In re Kristin H.*, *supra*, 46 Cal.App.4th at pp. 1642, 1667-1668). Significantly, in doing so, the *In re Kristin H.* Court “agree[d] with those cases holding that violation of a statutory right to counsel is properly reviewed under the harmless error test enunciated in *People v. Watson*, *supra*, 46 Cal.2d 818, 836. [Citations.]” (*Id.* at p. 1668.) Thus, the *In re Kristin H.* Court expressly recognized the similarity between an error in not appointing counsel in dependency proceedings and a claim of ineffective assistance of counsel in determining that a parent alleging ineffective assistance was required to demonstrate prejudice. (*Ibid.*)

The facts in this case established the error at the jurisdiction/disposition stage of the proceedings was harmless. These facts include, but are not limited to, the fact that Father was incarcerated when the child was born and remained incarcerated during the duration of the proceedings and well-

beyond any possible reunification period (Opinion, pp. 1178-1179, 1190-1192), there were several bases upon which to deny Father reunification services (Opinion, pp. 1189-1192), Father's family was not available for placement (Clerk's Transcript, Volume 1, p. 20) and Father only asked that they be permitted to visit the child (Opinion, p. 1180), and Father did not object to the child's placement and only reported he desired that legal guardianship be implemented as opposed to adoption (Opinion, p. 1181).

As Division One of the Second District Court of Appeal explained in affirming the order terminating Father's parental rights, "[] Father cannot establish a reasonable probability that the challenged errors affected the court's termination of Father's parental rights as to Christopher. The errors are therefore harmless under *Watson*^[2], the applicable framework for assessing prejudice here. [Citation.] Moreover, even if the more stringent *Chapman*^[3] framework were to apply, we further conclude, based on the undisputed facts and the portions of section 361.5 discussed above, that the errors were also harmless beyond a reasonable doubt." (Opinion, p. 1193.)

Thus, while DCFS agrees that the disposition stage of the proceedings is important and involves critical issues such as removal of a child from parental custody and the provision of services (CADC Amicus 20-21), it cannot agree that it follows

² This is a reference to *People v. Watson, supra*, 46 Cal.2d 818.

³ This is a reference to *Chapman v. California* (1967) 386 U.S. 18.

that error in the appointment of counsel is never amenable to a harmless error analysis (CADC 18-23).

Father was also provided with counsel after the jurisdiction/disposition hearing, including at the permanency hearings and the hearing at which his parental rights were terminated. (Opinion, pp. 1176, 1181, 1192.) CADC's brief does not acknowledge this and appears to incorrectly imply and/or suggest Father went without counsel for the duration of the proceedings and was not represented at the permanency hearings, much less the hearing at which Father's parental rights were terminated. (CADC Amicus 18-20, 23.) And, if Father had never been appointed counsel and/or had not been represented at the permanency hearings, including the hearing terminating his parental rights, that would have been relevant to assessing whether the error was harmless under a harmless error analysis.

Contrary to CADC's position, the error in the instant case is *not* fundamentally different from an ineffective assistance of counsel. The inquiry into prejudice is no more speculative when there is error in not appointing counsel early in the proceedings than a claim of ineffective counsel at the same stage in the proceedings. (CADC Amicus 18-19.) They both involve the same statutory rights. (§§ 317, subd. (b), 317.5.) This is especially true when counsel was appointed at a later date (Opinion, pp. 1176, 1181, 1192) and the parent was represented at the hearing at the permanency hearings and the hearing at which his parental rights were terminated (Opinion, pp. 1176, 1181, 1192).

For these reasons, error with respect to the appointment of counsel at the jurisdiction/disposition stage of dependency proceedings *is* analogous to assessing a claim of ineffective assistance of counsel. Prejudice is therefore relevant and should be deemed necessary to establish reversible error.

III. Courts Have Not Routinely Applied Structural Error In the Dependency Context. Furthermore, Those That Found Structural Error Predated This Court's Decision In *In re James F.*, *supra*, 42 Cal.4th 901.

CADC cites to Father's Opening Brief on the Merits and suggests that reviewing courts have routinely applied structural error in the dependency context. (CADC Amicus 21-22.)

However, as discussed in Respondent's Answer Brief on the Merits, that is simply not accurate and the majority of the cases Father cites to for the proposition that structural error has been widely applied in dependency proceedings did not actually hold the alleged error was structural.⁴ (Answer Brief on the Merits 48-53.)

Furthermore, as also previously discussed in Respondent's Answer Brief on its Merits, the cases that CADC and Father cite to that involved a complete lack of notice or failure to provide a statutorily required status review report (CADC Amicus 21-22; Brief on the Merits 22-23) predated *In re James F.*, *supra*, 42 Cal.4th 901. (Answer Brief on the Merits 46-47.) Father and CADC also overlook that in holding that a juvenile court's error in the process used for the appointment of a guardian ad litem for

⁴ Respondent will not restate argument made in its Answer Brief on the Merits.

a parent in a dependency proceeding was subject to harmless error analysis, this Court stated in conclusion, “If the outcome of a proceeding has not been affected, denial of a right to notice and a hearing may be deemed harmless and reversal is not required. [Citation.]” (*In re James F.*, *supra*, 42 Cal.4th at p. 918.)

CADC further overlooks that in *In re A.D.* (2011) 196 Cal.App.4th 1319, 1324-1327, the Fourth District Court of Appeal acknowledged that case law, including case law from that very Court, which CADC cites to in support of its position, previously held that failure to provide notice and a statutorily required status review report were structural error. (CADC Amicus, 21-22.) However, the *In re A.D.* Court cited to this Court’s subsequent holding in *In re James F.*, *supra*, 42 Cal.4th 901, and held that the errors in not providing the mother with a copy of the status review report and notice of the status review hearing, which resulted in her services being terminated, were *not* structural, but rather, subject to a harmless error analysis. (*In re A.D.*, *supra*, 196 Cal.App.4th at pp. 1324-1327.)

This was not the first time that a previous holding finding structural error in dependency proceedings was questioned in light of subsequent decisions from this Court. In *In re Sabrina H.* (2007) 149 Cal.App.4th 1403, 1419-1420, the Fourth District Court of Appeal questioned whether *Judith P. v. Superior Court* (2002) 102 Cal.App.4th 535, which deemed an agency’s failure to serve a parent with a statutorily required status report to be structural error, was still good law in light of this Court’s decision in *In re Celine R.*, *supra*, 31 Cal.4th 45.

The *In re Sabrina H.* Court explained that in *Judith P. v. Superior Court*, the Court of Appeal “relied heavily on criminal cases in holding the tardy delivery of the status report constituted structural error[,]” and that the following year, in *In re Celine R., supra*, 31 Cal.4th 45, 58-59, this Court “criticized case law that analogized criminal cases to dependency cases; the high court observed that such an analogy was inapt.” (*In re Sabrina H., supra*, 149 Cal.App.4th at p. 1420, fn. 14.) CADC does not acknowledge this. (CADC Amicus, 21-22.)

CADC also cites to the dissent in *Lassiter v. Dep’t of Social Services* (1981) 452 U.S. 18, in support of its position. (CADC Amicus 15, 18.) However, *Lassiter v. Dep’t of Social Services* addressed whether the appointment of counsel for indigent parents was constitutionally required *in proceedings to terminate parental rights*, not at the jurisdiction/disposition stage of dependency proceedings. (*Ibid.*)

In the present case, unlike the parent in *Lassiter v. Dep’t of Social Services, supra*, 452 U.S. 18, Father *was* represented by counsel at the permanency hearings, including the hearing at which parental rights were terminated. (Opinion, pp. 1176, 1181, 1182, 1192.) In fact, counsel was appointed to represent him approximately 16 months before his parental rights to Christopher were ultimately terminated. (Opinion, at p. 1181.)

Furthermore, for all the reasons stated in Respondent’s Answer Brief on the Merits, *Lassiter v. Dep’t of Social Services* supports Division One’s holding in the instant case (Answer Brief on the Merits 44-46) and neither the Majority’s opinion nor the

Dissent in *Lassiter v. Dep't of Social Services* support that failure to appoint counsel at the jurisdiction/disposition stage of the proceeding constitutes structural error.

Conclusion

In conclusion and as stated in Respondent's Answer Brief on the Merits, this Court should follow its precedent, "decline Father's invitation to expand current law and deem reversible per se an error in dependency proceedings that is amenable to harmless error analysis" (Opinion, p. 1177), and affirm the Second District's decision in the instant case.

DATED: September 27, 2021 Respectfully submitted,

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DATED: September 27, 2021 Respectfully submitted,

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Declaration Of Service

STATE OF CALIFORNIA, County of Los Angeles:

ARLENE MEZA states: I am employed in the County of Los Angeles, State of California, over the age of eighteen years and not a party to the within action. My business address is 648 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012.

On September 27, 2021, I served the attached **RESPONDENT LOS ANGELES COUNTY DEPARTMENT OF CHILDREN AND FAMILY SERVICES' ANSWER TO AMICUS BRIEF IN SUPPORT OF APPELLANT FILED BY THE CALIFORNIA APPELLATE DEFENSE COUNSEL IN THE MATTER OF C.L., SUPREME COURT NO. S265910, 2d JUVENILE NO. B305225, LASC NO. 17CCJP02800**, to the persons and/or representative of the court as addressed below.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on September 27, 2021, at Los Angeles, California.

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ARLENE MEZA

STATE OF CALIFORNIA
Supreme Court of California**PROOF OF SERVICE**STATE OF CALIFORNIA
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