

Case No. B282023

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
DIVISION SEVEN

A.G., a Minor by and through his Guardian Ad Litem Tamara Ford; Tamara Ford, individually and B.P., a Minor by and through their Guardian Ad Litem Tamai Gilbert,

Plaintiff-Appellant

vs.

COUNTY OF LOS ANGELES, LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT and DOES 1 through 50,
Defendants-Respondents.

On Appeal from the Los Angeles Superior Court
Honorable Ross M. Klein
Civil Case Nos. TC028173 and TC028210 (consolidated)

APPLICATION FOR LEAVE TO FILE PROPOSED *AMICUS CURIAE* BRIEF OF NATIONAL CENTER FOR LESBIAN RIGHTS, ACLU OF SOUTHERN CALIFORNIA, ACLU OF NORTHERN CALIFORNIA, ACLU OF SAN DIEGO & IMPERIAL COUNTIES, LOS ANGELES LGBT CENTER, AMIRA HASENBUSH, Esq., AND PROFESSOR NANCY POLIKOFF IN SUPPORT OF APPELLANT, A.G.

Shannon P. Minter (SBN 168907)
Catherine P. Sakimura (SBN 246463)
National Center for Lesbian Rights
870 Market Street, Suite 370
San Francisco, CA 94102
Telephone: (415) 365-1305
Fax: (415) 392-8442
Email: CSakimura@nclrights.org

Attorneys for Amici Curiae

**APPLICATION TO FILE AMICUS CURIAE BRIEF IN
SUPPORT OF APPELLANT, A.G.**

Pursuant to California Rules of Court, Rules 8.200(c)(1) and 8.360(f), *amici* respectfully request leave to file the attached amicus brief supporting the position of Appellant, A.G.

Interest of Amici Curiae

Amicus curiae National Center for Lesbian Rights (“NCLR”) is a national legal non-profit organization, founded in 1977, with a commitment to advancing the rights and safety of lesbian, gay, bisexual, and transgender (“LGBT”) people and their families. NCLR has a strong interest in ensuring that children raised by same-sex parents have recognized legal relationships with both people who have functioned as their parents, regardless of whether there is a biological or adoptive relationship between the child and the parent. In California, NCLR attorneys have served as counsel in many of the precedent-setting cases involving the rights of members of same-sex couples to be recognized as legal parents, including *Elisa B. v. Superior Court*, 37 Cal. 4th 108 (2005) and *Charisma R. v. Kristina S.*, 140 Cal.App.4th 301 (2006).

Amici curiae Amici the American Civil Liberties Union (“ACLU”) of Southern California, the ACLU of Northern California, and the ACLU of San Diego & Imperial Counties (collectively “ACLU *amici*”) are regional affiliates of the ACLU, a national nonprofit, nonpartisan organization dedicated to furthering the principles of liberty and equality embodied in the United States Constitution and this nation’s civil rights laws. ACLU *amici* work to advance the civil rights and civil liberties of Californians in the courts, in legislative and policy arenas, and in the community. ACLU *amici* have participated in numerous prior cases, both as direct counsel and as amici, that involve the scope of the rights the Constitution and California law guarantee to LGBT people. ACLU *amici* have a long and abiding interest in ensuring that the government treats LGBT people and their families equally and that LGBT people and their families have full and equal access to justice in California.

The Los Angeles LGBT Center (the “Center”) is the world’s largest LGBT organization, hosting an average of 45,000 client visits each month throughout 8 facilities with a staff of more than 600. In addition to providing senior services, youth services, legal services, and housing, the Center is a Federally Qualified Health Center providing primary care, HIV care, and transgender care. The Center is also active in policy advocacy on behalf of the LGBT community at local, state, and federal levels. The Center’s clients include many LGBT parents raising children to whom they are not biologically related.

Amira Hasenbush, Esq., is the owner of the Law Office of Amira Hasenbush as well as the Jim Kepner Law and Policy Fellow for the Williams Institute, an LGBT law and policy research center at UCLA School of Law. In her legal practice, she specializes in family formation law for LGBT families, which includes assistance in surrogacy arrangements as well as sperm donation, egg donation and adoption. Given the biological realities of same-sex couples and many couples who have a transgender partner, most of her clients are part of families where one or both parents are not biologically related to their children. Therefore, she regularly works on ensuring that the law legally recognizes and protects the parent-child relationship as it exists in reality, regardless of biology. She is deeply familiar with and invested in protecting the legal status of non-biological parents, both in life and in death.

Nancy Polikoff is Professor of Law at American University Washington College of Law. For more than 40 years, she has been working on issues involving LGBT parents around the United States. Her scholarship has been cited in a number of court rulings; she has litigated test cases on parentage; and she has worked on parentage legislation. In 2011, she received the Dan Bradley Award from the National LGBT Bar Association, the organization’s highest honor.

Amici are particularly well suited to offer amicus assistance to the Court in this matter, as amici represent non-biological parents and their children, including same-sex parents and their children, in cases and policy advocacy. The constituents of *amici* include many non-biological parents and their children with a direct interest in ensuring that their

families are treated equally under California law. *Amici* believe that their extensive experience regarding the specific issue raised in this appeal can be of significant assistance to the Court in considering this case.

Amici believe that the attached brief will assist this Court by providing further analysis of why the Superior Court's finding that A.G. did not have standing to bring a wrongful death lawsuit after his legal parent died is contrary to both the plain language of California law, California public policy, and the U.S. and California Constitutions. *Amici* accordingly respectfully request leave to submit the attached *amicus curiae* brief to present additional authorities and discussion in support of Appellant's arguments on these issues.

This application is timely under Rule 8.200(c)(1) of the California Rules of Court.

Under California Rules of Court, Rule 8.200(c)(3), I certify that no party or counsel for any party in this matter participated in authoring this brief, and that no one other than *amici* made any monetary contribution to fund the preparation or filing of this brief.

For all of the reasons set forth above, *amici* respectfully request that they be granted leave to file the accompanying *amicus curiae* brief.

Dated: February 5, 2018

/s/ Catherine P. Sakimura
Catherine P. Sakimura, #246463
Shannon P. Minter, #168907
National Center for Lesbian
Rights
870 Market Street, Suite 370
San Francisco, CA 94102
415.365.1329 telephone
415.392.8442 fax
csakimura@nclrights.org
Attorneys for Amici Curiae

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1313 West 8th Street, Los Angeles, CA 90017. I am employed in the office of a member of the bar of this court at whose direction the service was made.

On February 5, 2018, I served the foregoing document: **APPLICATION FOR LEAVE TO FILE PROPOSED AMICUS CURIAE BRIEF OF NATIONAL CENTER FOR LESBIAN RIGHTS, ACLU OF SOUTHERN CALIFORNIA, ACLU OF NORTHERN CALIFORNIA, ACLU OF SAN DIEGO-IMPERIAL COUNTIES, LOS ANGELES LGBT CENTER, AMIRA HASENBUSH, Esq., and PROFESSOR NANCY POLIKOFF IN SUPPORT OF APPELLANT, A.G.**, on the parties in this action by placing a true and correct copy of each document thereof, enclosed in a sealed envelope, addressed as follows:

I caused such envelope(s) fully prepaid with U.S. Postage to be placed in the United States Mail at Los Angeles, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct.

Executed on February 5, 2018, at Los Angeles, California.



Diana Gonzalez

SERVICE LIST

Attorney	Party
<p>Olufela Kumasi Orange Orange Law Offices 3435 Wilshire Blvd Suite 2910 Los Angeles, CA 90010 Email: o.orange@orangelawoffices.com</p> <p>George W. Abele Paul Hastings LLP 515 S. Flower Street 25th Floor Los Angeles, CA 90071-2228 Email: georgeabele@paulhastings.com</p>	<p>Plaintiff-Appellant: A.G.</p>
<p>Harold G. Becks Douglas L. Day Becks & Associates 3250 Wilshire Blvd. Suite 708 Los Angeles, CA 90010 Email: hbecks@beckslaw.com Email: dougday@beckslaw.com</p> <p>John E. Sweeney The Sweeney Firm 315 S. Beverly Drive Suite 305 Beverly Hills, CA 90212-4308 Email: jes@thesweeneyfirm.com</p>	<p>Defendant-Respondent: County of Los Angeles Sheriff's Department</p>
<p>Office of the Attorney General 300 South Spring Street Ste. 5001 Los Angeles, CA 90013</p>	<p>Office of the Attorney General Service upon the CA Attorney General – per CRC Rule 8.29(c)</p>

Clerk of the Court Appellate Division Los Angeles Superior Court 111 N. Hill Street, 6th Floor Los Angeles, CA 90012	Appellate Division of the Superior Court
George Deukmejian Courthouse Hon. Ross M. Klein Dept. S-27 275 Magnolia Ave. Long Beach, CA 90802	Superior Court Los Angeles County

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Shannon P. Minter (SBN 168907)
Catherine P. Sakimura (SBN 246463)
National Center for Lesbian Rights
870 Market Street, Suite 370
San Francisco, CA 94102
Telephone: (415) 365-1305
Fax: (415) 392-8442
Email: CSakimura@nclrights.org

Attorneys for Amici Curiae

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INTRODUCTION

Appellant, A.G., alleged in his complaint for wrongful death below that Respondent, the Los Angeles County Sheriff's Department, entered his father's home, used a Taser on his father – who was mentally ill – because he would not stop singing in his bathroom, and that his father died as a result. (App. Appendix at pp. 9-11.) The Superior Court improperly dismissed A.G.'s wrongful death claim solely because A.G.'s father, Brian Pickett, was not A.G.'s biological or adoptive father, even though A.G. alleged facts that, if proven, would establish that Mr. Pickett was A.G.'s legal parent under well-settled California law. (See Order at p. 2; App. Appendix at p. 146.) Under the plain language of California's statutes, any child who can establish that the decedent is their legal parent under the California Uniform Parentage Act (hereafter California UPA), as A.G. has alleged, has standing to bring an action for wrongful death under Code of Civil Procedure, Section 377.60. The Superior Court's dismissal of A.G.'s claim is contrary to California statutes, severely undermines California's public policy, and violates the U.S. and California Constitutions.

ARGUMENT

I. THE PLAIN LANGUAGE OF CALIFORNIA'S STATUTES PROVIDES THAT A CHILD HAS STANDING TO BRING WRONGFUL DEATH CLAIMS WHEN THEIR LEGAL PARENT HAS BEEN KILLED, REGARDLESS OF BIOLOGICAL TIES.

The Superior Court's finding that wrongful death claims can only be brought by children with biological or adoptive parents is contrary to the plain language of California's parentage, probate, and wrongful death statutes. California allows any child to bring a wrongful death action after the death of a parent if the decedent's parentage can be established under the California UPA. A.G. has alleged facts showing that Mr. Pickett is his legal parent under the California UPA and thus has standing.

California's wrongful death statute allows "[a] cause of action for the death of a person caused by the wrongful act or neglect of another may be asserted by. . . [t]he decedent's surviving spouse, domestic partner, *children*, and issue of

deceased children.” (Code of Civ. Proc., § 377.60, subd. (a), italics added.)¹ Both parties recognize that whether a claimant has standing to bring a wrongful death action under Code of Civil Procedure Section 377.60 is determined by whether the claimant would inherit intestate under the Probate Code. (Resp. Br. at p. 8; Pet. Br. at pp. 26-27.) As another Division of this Court has explained, the term “children” in Code of Civil Procedure, Section 377.60 means a person who would inherit intestate as a child of the decedent under the Probate Code. (*Cheyanna M. v. A.C. Nielsen Co.* (1998) 66 Cal.App.4th 855, 863–864; see also *Scott v. Thompson* (2010) 184 Cal.App.4th 1506, 1514 [non-biological father who was a presumed parent under Fam. Code § 7611, subd. (a) had standing to bring a wrongful death claim because he was entitled to inherit intestate from the child under the Probate Code].)

Respondent incorrectly asserts that A.G. would not inherit intestate from Mr. Pickett because only a decedent’s biological “issue” are entitled to inherit. (Respondent’s Brief at

¹ Code of Civil Procedure 377.60, subdivisions (b) and (c) also allow claims by stepchildren and any minor who has “resided for the previous 180 days in the decedent’s household and was dependent on the decedent for one-half or more of the minor’s support.” Neither of these subsections apply to the case at bar. (See Respondent’s Brief at pp. 10-11.) These other provisions are also not sufficient to protect children with legal parents under the California UPA who are neither biological nor adoptive parents, and who have been killed. First, the California UPA recognizes a number of circumstances in which a child’s legal parent is neither a biological nor an adoptive parent; these are legal parents, not stepparents. Second, children with biological or adoptive parents do not have to prove that they are minors who have continuously resided with their parent for the prior six months and that the parent provided more than one half of their financial support in order to seek compensation for wrongful death. Placing these limitations solely on children whose legal parents under the California UPA are neither biological nor adoptive parents would irrationally discriminate against this subset of children, in violation of the U.S. and California Constitutions, as well as California public policy, as explained below in Sections II and III.

p. 13.) Respondent provides no citation or support for this proposition, nor does any exist. The plain language of the Probate Code provides that a child inherits intestate if parentage is established under the California UPA, which A.G. has alleged he can prove. Under the Probate Code, a person's "issue" "means all his or her lineal descendants of all generations, with the relationship of parent and child at each generation being determined by the definitions of child and parent." (Prob. Code, § 50.) The Probate Code further provides that "a relationship of parent and child" exists between a person and their "natural parents" and that "[a] natural parent and child relationship is established where that relationship is presumed and not rebutted pursuant to the Uniform Parentage Act." (Prob. Code, §§ 6450, 6453).

The California UPA defines a "[n]atural parent" as "a nonadoptive parent established under [the California UPA], whether biologically related to the child or not." (Fam. Code, § 7601.) A.G. alleged that Mr. Pickett was his father under Family Code Section 7611, subdivision (d), which is a provision of the California UPA providing that "[a] person is presumed to be the natural parent of a child if the person . . . receives the child into his or her home and openly holds out the child as his or her natural child." This presumption is not rebutted by a lack of biological tie. (*In re Nicholas H.* (2002) 28 Cal.4th 56 [man who lived with a child since birth and held himself out as the child's father was a legal father even though he and the mother had always known he was not the biological father].) When a presumed father has had a substantial parental relationship with a child, his claim prevails even over the objections of a biological father who has not had a substantial relationship with the child. (*In re Jesusa V.* (2004) 32 Cal.4th 588 [non-biological presumed father who lived with the child and held the child out as his own was a legal father, and biological father who had been mostly absent from the child's life was not a legal father].)

Here, A.G. alleged that Mr. Pickett is his father under Family Code Section 7611, subdivision (d) because 1) Mr. Pickett received A.G. into his home and lived with A.G. and his mother, and 2) Mr. Pickett held A.G. out as his own child, including telling his family that "[w]e're all going to treat [A.G.] as though he is my biological son. I'm taking the role as his father." (App. Appendix at pp. 65-66, 217; see also Appellant's

Opening Brief at p. 8.) Mr. Pickett cared for A.G. as his son since infancy, treating A.G. and his biological children equally and holding A.G. out as his child to friends, family, and everyone in his life. (Appellant’s Opening Brief at pp. 8-9.) The Superior Court improperly relied on the fact that A.G. has a biological father whose identity is known but who has been absent from A.G.’s life, despite the fact that Mr. Pickett has been in A.G.’s life as his father since A.G. was one year old, and A.G.’s biological father has not been in A.G.’s life. (App. Appendix at pp. 145, 115.) Under California statute and decisions of the California Supreme Court, A.G. has alleged facts that, if proven, establish that Mr. Pickett was A.G.’s legal father under the California UPA. Indeed, the California case law on this issue could scarcely be more clear. (See, e.g., *In re Nicholas H.*, *supra*, 28 Cal.4th 56; *In re Jesusa V.*, *supra*, 32 Cal.4th 588.)

Respondent’s suggestion that A.G. is Mr. Pickett’s “unadopted stepson,” (Respondent’s Brief at p. 11), has no basis in law or fact – Mr. Pickett and A.G.’s mother were not married, and A.G. asserted that Mr. Pickett is his “natural parent” under the California UPA, not a stepparent. Respondent’s argument is based solely on the erroneous assumption that the term “natural parent” is synonymous with “biological parent,” despite the explicit statutory statement that a person can be a “natural parent” . . . whether biologically related to the child or not.” (Fam. Code, § 7601.) This Court should therefore reverse and remand this action for a determination of whether A.G. can prove the allegations in his complaint and thereby establish that Mr. Pickett was A.G.’s father under the California UPA.

II. DENYING A SUBSET OF LEGAL CHILDREN THE RIGHT TO BRING WRONGFUL DEATH CLAIMS VIOLATES STRONG CALIFORNIA PUBLIC POLICY.

The Superior Court’s interpretation of the wrongful death statute would exclude an entire class of children from the right to bring wrongful death actions, including children with same-sex parents, children conceived through assisted reproduction, children born to married parents who are not both biological parents, and children like A.G. who have been raised since infancy by a non-biological parent. (*Elisa B. v. Superior*

Court (2005) 37 Cal. 4th 108; Fam. Code, §§ 7611-7613.) This result is contrary to California’s strong public policy in favor of permitting all legal children to bring wrongful death actions when a parent is wrongfully killed. It would also contravene California’s strong public policy of recognizing and protecting parent-child bonds regardless of biological ties. In fact, a parental relationship between a child and a non-biological father who has had a significant relationship with the child, like Mr. Pickett, is given greater protection under California law than a claim by a biological father who has been mostly absent from a child’s life. (*Steven W. v. Matthew S.* (1995) 33 Cal.App.4th 1108, 1116 [“A man who has lived with a child, treating it as his son or daughter, has developed a relationship with the child that should not be lightly dissolved This social relationship is much more important, to the child at least, than a biological relationship of actual paternity.” (quoting *Susan H. v. Jack S.* (1994) 30 Cal.App.4th 1435, 1443), alteration in original].) For example, in dependency cases involving abuse or neglect, a presumed parent with no biological relationship to a child has standing to seek placement of the child; in contrast, a biological father has standing to do so only if the person is also either a presumed parent or can prove that he has a substantial relationship with the child or promptly attempted to take on full parental responsibilities after the child’s birth. (See, e.g., *In re Jovanni B.* (2013) 221 Cal.App.4th 1482, 1488–90.) California policy thus recognizes that there is a greater need to protect and recognize a parent-child relationship where the parent has an existing parent-child bond than to protect mere biological ties. Excluding all children with non-biological and non-adoptive parents from wrongful death actions is directly contrary to this strong public policy.

The harms inflicted by such a result are plain, leaving children like A.G. without financial security when a parent who has cared for and supported them has been killed, solely because that parent was not a biological or adoptive parent. A.G.’s siblings, who were raised alongside A.G. by Mr. Pickett, have been allowed to continue their action seeking compensation for the loss of their father’s care and support, (App. Appendix at pp. 145-48, 217), but A.G. has been denied this ability. This ruling creates two classes of legal children –

one that receives all the rights of a legal parent-child relationship, and one that receives only some of these rights.

III. EXCLUDING A SUBSET OF LEGAL CHILDREN FROM BRINGING WRONGFUL DEATH ACTIONS VIOLATES EQUAL PROTECTION.

The Superior Court's ruling also violates the Equal Protection Clause of the United States Constitution and the California Constitution by impermissibly discriminating against an entire subset of children whose legal parents are neither biological nor adoptive. (See U.S. Const., 14th amend., § 1; Cal. Const., art. I, § 7.) The U.S. Supreme Court has explained that laws discriminating against children based on the identity of their parents or circumstances of the child's birth violate the Equal Protection Clause unless the distinction is "substantially related to an important governmental objective." (*Clark v. Jeter* (1988) 486 U.S. 456, 461; see also, e.g., *Trimble v. Gordon* (1977) 430 U.S. 762 (striking down statute that prohibited non-marital children from inheriting from their father unless their parents had married); *Plyler v. Doe* (1982) 457 U.S. 202, 219–20 (striking state statute denying public school education to children with undocumented immigrant parents, citing *Trimble v. Gordon*). The California Supreme Court has held that laws that discriminate against children based on their "status of birth" or identity of their family members are subject to strict scrutiny under the California Constitution and must be stricken unless supported by a "compelling" state interest. (*Darces v. Woods* (1984) 35 Cal.3d 871, 891–893 [striking as unconstitutional California regulations that allowed the state to deny government benefits to U.S. citizen children who had undocumented immigrant siblings].) As the California Supreme Court has explained, state laws that discriminate against children based on the conduct of their parents must be held to the most rigid and exacting standard of constitutional review. (*Id.* at 893.)

Respondent has raised no reason, let alone an important or compelling one, why California has an interest in allowing wrongful death claims to be brought only by children with biological or adopted parents while excluding other similarly

situated children whose legal parents have been killed. Indeed, excluding children with non-biological parents from wrongful death claims would be contrary to the purpose of Section 377.60 of the Code of Civil Procedure. As this Court has explained, “[t]he purpose behind the wrongful death statute is to provide compensation for the loss of companionship and other losses resulting from decedent’s death.” (*Fraizer v. Velkura* (2001) 91 Cal.App.4th 942, 945 [quoting *Marks v. Lyerla* (1991) 1 Cal.App.4th 556, 561].) Because wrongful death actions are intended to compensate surviving family members who have lost the companionship and care of the decedent, there can be no important or compelling reason for California to allow claims by children with biological or adoptive parents regardless of the strength or nature of their parental relationship, while excluding children with legal parents under Family Code Section 7611, subdivision (d), which requires proof that the parent and child lived together and that the parent held the child out as their own.

The Superior Court’s ruling also effectively excludes children with same-sex parents, who nearly always have a non-biological parent,² from the benefits of Code of Civil Procedure Section 377.60. As the U.S. Supreme Court has recognized, same-sex parents and their children have equal protection and due process rights to receive all the same state law benefits granted to different-sex parents and their children. (*Obergefell v. Hodges* (2015) 135 S.Ct. 2584, 2600 [holding that same-sex couples have a constitutional right to marry and noting harms suffered by children of same-sex parents because of unequal treatment]; see also *U.S. v. Windsor* (2013) 133 S. Ct. 2675, 2696 [holding that the federal law prohibiting recognition of marriages between same-sex spouses serves no “legitimate purpose,” but rather “instructs . . . all persons with whom same-sex couples interact, including their own children, that their marriage is less worthy than the marriages of others”].) California law recognizes circumstances in which same-sex parents, like similarly situated different-sex parents, are legal parents even if they do not have a biological or adoptive

² Unpublished Williams Institute research indicates that approximately 16,000 lesbian and gay adults in California are currently raising children as non-biological, non-adoptive parents.

relationship to their children. That includes circumstances, where a biological parent's same-sex partner holds a child out as her child and raises the child as her own, even though she is not biologically related to the child, and families with children conceived through assisted reproduction. (*Elisa B.*, *supra*, 37 Cal.4th 108 [holding that the same provision relied on to establish the legal parentage of a non-biological father in *In re Nicholas H.*, *supra*, 28 Cal.4th 56 must be applied equally to a non-biological mother]; Fam. Code § 7611 [listing methods of establishing that a person is a "natural parent" using gender neutral language]; Fam. Code § 7613, subd. (a) [person who consents in writing to conception of a child through assisted reproduction is a legal parent].) The result of the Superior Court's ruling thus violates both the U.S. and California Constitutions.

CONCLUSION

For the foregoing reasons, *amici* respectfully request that this Court reverse the decision below and remand this case for a determination of Mr. Pickett's parentage and allow A.G. to proceed with his wrongful death claim.

Respectfully submitted February 5, 2018,

/s/ Catherine P. Sakimura
Catherine P. Sakimura, #246463
Shannon P. Minter, #168907
National Center for Lesbian
Rights
870 Market Street, Suite 370
San Francisco, CA 94102
415.365.1329 telephone
415.392.8442 fax
csakimura@nclrights.org
Attorneys for Amici Curiae

CERTIFICATE OF COMPLIANCE

The accompanying *amicus curiae* brief complies with the specifications of California Rules of Court 8.204(c) as follows: The word count of the brief is 2,798 words, based on the count of the word processing system used to prepare the brief.

I certify that the foregoing is true and correct.
Dated February 5, 2018, at San Francisco, California.

/s/ Catherine P. Sakimura
Catherine P. Sakimura

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1313 West 8th Street, Los Angeles, CA 90017. I am employed in the office of a member of the bar of this court at whose direction the service was made.

On February 5, 2018, I served the foregoing document: **PROPOSED AMICUS CURIAE BRIEF OF NATIONAL CENTER FOR LESBIAN RIGHTS, ACLU OF SOUTHERN CALIFORNIA, ACLU OF NORTHERN CALIFORNIA, ACLU OF SAN DIEGO-IMPERIAL COUNTIES, LOS ANGELES LGBT CENTER, AMIRA HASENBUSH, Esq., AND PROFESSOR NANCY POLIKOFF IN SUPPORT OF APPELLANT, A.G.**, on the parties in this action by placing a true and correct copy of each document thereof, enclosed in a sealed envelope, addressed as follows:

I caused such envelope(s) fully prepaid with U.S. Postage to be placed in the United States Mail at Los Angeles, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct.

Executed on February 5, 2018, at Los Angeles, California.



Diana Gonzalez

SERVICE LIST

Attorney	Party
<p>Olufela Kumasi Orange <i>Orange Law Offices</i> 3435 Wilshire Blvd Suite 2910 Los Angeles, CA 90010 Email: o.orange@orangelawoffices.com</p> <p>George W. Abele <i>Paul Hastings LLP</i> 515 S. Flower Street 25th Floor Los Angeles, CA 90071-2228 Email: georgeabele@paulhastings.com</p>	<p>Plaintiff-Appellant: A.G.</p>
<p>Harold G. Becks Douglas L. Day <i>Becks & Associates</i> 3250 Wilshire Blvd. Suite 708 Los Angeles, CA 90010 Email: hbecks@beckslaw.com Email: dougday@beckslaw.com</p> <p>John E. Sweeney <i>The Sweeney Firm</i> 315 S. Beverly Drive Suite 305 Beverly Hills, CA 90212-4308 Email: jes@thesweeneyfirm.com</p>	<p>Defendant-Respondent: County of Los Angeles Sheriff's Department</p>
<p>Office of the Attorney General 300 South Spring Street Ste. 5001 Los Angeles, CA 90013</p>	<p>Office of the Attorney General Service upon the CA Attorney General – per CRC Rule 8.29(c)</p>

Clerk of the Court Appellate Division Los Angeles Superior Court 111 N. Hill Street, 6th Floor Los Angeles, CA 90012	Appellate Division of the Superior Court
George Deukmejian Courthouse Hon. Ross M. Klein Dept. S-27 275 Magnolia Ave. Long Beach, CA 90802	Superior Court Los Angeles County