IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

FOURTH APPELLATE DISTRICT

DIVISION ONE

ARTURO CASTAÑARES, Plaintiff and Petitioner, v. SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF SAN DIEGO, Respondent, CITY OF CHULA VISTA, Defendant and Real Party in Interest.	D082048 (San Diego County Case No. 37-2021-00017713-CU-MC-CTL Hon. Timothy Taylor) Ruling after Bench Trial Dated April 10, 2023

APPLICATION FOR PERMISSION TO FILE AMICUS CURIAE BRIEF; BRIEF AMICUS CURIAE
(In Support of Denial of the Extraordinary Writ Petition)

Calvin House (Bar No. 134902)
calvin.house@gphlawyers.com
Gutierrez, Preciado & House, LLP
3020 East Colorado Boulevard
Pasadena, CA 91107
T: 626-449-2300 | F: 626-449-2330

Attorneys for Amici Curiae
the League of California Cities and
the International Municipal Lawyers Association

TO BE FILED IN THE COURT OF APPEAL APP-008

COURT OF APPEAL FOURTH APPELLATE DISTRICT, DIVISION ONE	COURT OF APPEAL CASE NUMBER D082048
ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER 134902 NAME: Calvin House FIRM NAME: Gutierrez, Preciado & House, LLP STREET ADDRESS: 3020 E. Colorado Boulevard CITY: Pasadena STATE: CA ZIP CODE: 91107 TELEPHONE NO.: 626-449-2300 FAX NO.: 626-449-2330 E-MAIL ADDRESS: calvin.house@gphlawyers.com ATTORNEY FOR (name): Amici Curiae Cal Cities and IMLA	SUPERIOR COURT CASE NUMBER 2021-00017713
APPELLANT/ Arturo Castellanos PETITIONER RESPONDENT/ Superior Court for the County of San Diego REAL PARTY IN INTEREST: City of Chula Vista	

CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

(Check one): [x] INITIAL CERTIFICATE [ ] SUPPLEMENTAL CERTIFICATE

Notice: Please read rules 8.208 and 8.488 before completing this form. You may use this form for the initial certificate in an appeal when you file your brief or a prebriefing motion, application, or opposition to such a motion or application in the Court of Appeal, and when you file a petition for an extraordinary writ. You may also use this form as a supplemental certificate when you learn of changed or additional information that must be disclosed.

1. This form is being submitted on behalf of the following party *(name)*: League of California Cities

2. a. [x] There are no interested entities or persons that must be listed in this certificate under rule 8.208.

   b. [ ] Interested entities or persons required to be listed under rule 8.208 are as follows:

	Full name of interested entity or person	Nature of interest *(Explain):*
(1)		
(2)		
(3)		
(4)		
(5)		

[ ] Continued on attachment 2.

The undersigned certifies that the above-listed persons or entities (corporations, partnerships, firms, or any other association, but not including government entities or their agencies) have either (1) an ownership interest of 10 percent or more in the party if it is an entity; or (2) a financial or other interest in the outcome of the proceeding that the justices should consider in determining whether to disqualify themselves, as defined in rule 8.208(e)(2).

Date: September 1, 2023

Calvin House
(TYPE OR PRINT NAME)

▶ _____
(SIGNATURE OF APPELLANT OR ATTORNEY)

TO BE FILED IN THE COURT OF APPEAL

APP-008

COURT OF APPEAL FOURTH APPELLATE DISTRICT, DIVISION ONE	COURT OF APPEAL CASE NUMBER: D082048
ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NUMBER: 134902 NAME: Calvin House FIRM NAME: Gutierrez, Preciado & House, LLP STREET ADDRESS: 3020 E. Colorado Boulevard CITY: Pasadena STATE: CA ZIP CODE: 91107 TELEPHONE NO.: 626-449-2300 FAX NO.: 626 449 2330 E-MAIL ADDRESS: calvin.house@gphlawyers.com ATTORNEY FOR (name): Amici Curiae Cal Cities and IMLA	SUPERIOR COURT CASE NUMBER: 2021 00017713
APPELLANT/ Arturo Castanares PETITIONER: RESPONDENT/ Superior Court for the County of San Diego REAL PARTY IN INTEREST: City of Chula Vista	

CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

(Check one): [x] INITIAL CERTIFICATE [ ] SUPPLEMENTAL CERTIFICATE

Notice: Please read rules 8.208 and 8.488 before completing this form. You may use this form for the initial certificate in an appeal when you file your brief or a prebriefing motion, application, or opposition to such a motion or application in the Court of Appeal, and when you file a petition for an extraordinary writ. You may also use this form as a supplemental certificate when you learn of changed or additional information that must be disclosed.

1. This form is being submitted on behalf of the following party *(name)*: International Municipal Lawyers Association

2. a. [x] There are no interested entities or persons that must be listed in this certificate under rule 8.208

   b. [ ] Interested entities or persons required to be listed under rule 8.208 are as follows:

	Full name of interested entity or person	Nature of interest *(Explain)*:
(1)		
(2)		
(3)		
(4)		
(5)		

[ ] Continued on attachment 2

The undersigned certifies that the above-listed persons or entities (corporations, partnerships, firms, or any other association, but not including government entities or their agencies) have either (1) an ownership interest of 10 percent or more in the party if it is an entity; or (2) a financial or other interest in the outcome of the proceeding that the justices should consider in determining whether to disqualify themselves, as defined in rule 8.208(e)(2).

Date: September 1, 2023

Calvin House
(TYPE OR PRINT NAME)

▶ _____
(SIGNATURE OF APPELLANT OR ATTORNEY)

Form Approved for Optional Use
Judicial Council of California
APP-008 [Rev. January 1, 2017]

CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

Cal. Rules of Court, rules 8.208, 8.488
www.courts.ca.gov

TABLE OF CONTENTS

Application for Permission to File Amicus Curiae Brief 7
Amicus Curiae Brief 9
A Factual Background 10
B The Trial Court's Ruling 11
C Argument 12
1 The exemption for records of investigations should include the video footage from Chula Vista's drone program. 12
2 Privacy rights outweigh the public interest in disclosure of raw footage from the drone program. 14
3 Trial courts have the discretion under the CPRA to refuse disclosure where compliance would impose an unreasonable burden on local government resources 17
D Conclusion 18
Certificate of Compliance 19

TABLE OF AUTHORITIES

Cases

American Civil Liberties Union Foundation v. Deukmejian (1982) 32 Cal.3d 440 ..... 15, 17

American Civil Liberties Union Foundation v. Superior Court (2017) 3 Cal.5th 1032 15

Bertoli v. City of Sebastopol (2015) 233 Cal.App.4th 353 17

City of San Jose v. Superior Court (2017) 2 Cal.5th 608 ..... 14, 15, 16

Dixon v. Superior Court (2009) 170 Cal.App.4th 1271 12

Filarsky v. Superior Court (2002) 28 Cal.4th 419 13

Haynie v. Superior Court (2001) 26 Cal.4th 1061 ..... 9, 13

National Lawyers Guild v. City of Hayward (2020) 9 Cal.5th 488 ..... 16, 17

Statutes

Cal. Const., art. I, § 3 14

Gov. Code, § 7921.000 ..... 9, 14

Gov. Code, § 7922.000 ..... 10, 15

Gov. Code, § 7922.525 17

Gov. Code, § 7923.600 ..... 9, 11, 12, 13

Other Authorities

Abrams, *Vanessa Bryant Is Suing L.A. County Over Kobe Bryant Crash Photos: What to Know*, N.Y. Times (Feb. 28, 2023) 16

Note: *Beyond the Fourth Amendment: Limiting Drone Surveillance Through the Constitutional Right to Informational Privacy* (2013) 74 Ohio St. L.J. 669 11

Rules

Cal. Rules of Court, rule 8.204 19

Cal. Rules of Court, rule 8.487 7

Application for Permission to File Amicus Curiae Brief

To the Presiding Justice:

This application is submitted pursuant to California Rules of Court, rule 8.487(e), for permission to file an amicus curiae brief on behalf of The League of California Cities (Cal Cities), and the International Municipal Lawyers Association (IMLA). These two amici join the City of Chula Vista in urging the Court to deny Mr. Castañares's petition for an extraordinary writ.

The accompanying brief was authored by the undersigned. No one made a monetary contribution to fund the preparation or submission of the brief.

Cal Cities is an association of 477 California cities dedicated to protecting and restoring local control to provide for the public health, safety, and welfare of their residents, and to enhance the quality of life for all Californians. Cal Cities is advised by its Legal Advocacy Committee, comprised of twenty-four city attorneys from all regions of the State. The Committee monitors litigation of concern to municipalities and identifies those cases that have statewide or nationwide significance. The Committee has identified this case as having such significance.

IMLA has been an advocate and resource for local government attorneys since 1935. Owned solely by its more than 2,500 members, IMLA serves as an international clearinghouse for legal information and cooperation on municipal legal matters. IMLA's mission is to advance the responsible development of municipal law through education and advocacy by providing the collective viewpoint of local governments around the country on

legal issues before the Supreme Court of the United States, the United States Courts of Appeals, and state supreme and appellate courts.

The brief that these amici curiae seek permission to file will assist the Court by providing a broad perspective on the privacy and governmental interests implicated by California Public Records Act requests for electronically stored information collected by law enforcement agencies.

/Calvin House
Gutierrez, Preciado & House, LLP
Attorneys for Amici Curiae
League of California Cities and
the International Municipal
Lawyers Association

Amicus Curiae Brief

Technological advances in collection, storage and retrieval of electronic information have led to improvement in law enforcement's ability to identify and convict those who commit crimes. Those advances have also led to the accumulation and storage of substantial amounts of electronic data that contain law enforcement investigatory records and sensitive personal information.

Freedom of information laws like the California Public Records Act serve the vital public interest of ensuring access to the "people's business." (Gov. Code, § 7921.000.) Yet, such statutes recognize that the public's interest must be balanced against the right of individuals to privacy, the need to protect the integrity of law enforcement investigations, and the need to avoid overburdening public agencies. (*Haynie v. Superior Court* (2001) 26 Cal.4th 1061, 1064 ("certain records should not, for reasons of privacy, safety, and efficient governmental operation, be made public").)

Cal Cities and IMLA seek leave to file amicus briefs in cases such as this to ensure that the appellate courts are informed about the views of local governments on the issues raised. In this case, the amici urge the Court (1) to interpret the exemption in Government Code section 7923.600 for records of law enforcement investigations as having the scope necessary to protect the integrity of investigations, (2) to allow local governments sufficient leeway in interpreting the privacy exemptions from the disclosure requirements to protect their

citizens' privacy rights and avoid exposure to liability, and (3) to interpret the catchall exemption in Government Code section 7922.000 in a way that allows local governments to limit disclosure when necessary to assure efficient governmental operation.

A Factual Background

Mr. Castañares asked the City of Chula Vista to provide him with "access to and copies of video footage from all CVPD drone flights conducted between March 1 and March 31, 2021, as well as documents related to the retention and custody of such videos." [Ex 1, p. 17] The video footage turned out to consist of 537 video files, comprising 91 hours, 39 minutes, 52 seconds of drone footage, from over three hundred drone flights in response to emergency calls for service. [Ex 11, p. 494:3-8] The Chula Vista Police Department estimated that it would take about 1833 hours (or 229 workdays) for a technician to review and redact the March 2021 drone footage. [Ex 15, p. 521:10-21]

The drones that collected the footage were only dispatched to calls for emergency service. City policy bars using drones for patrolling or surveilling the City. [Ex 11, p. 490:17-21] The City has provided the public, including Mr. Castañares, with detailed information about the drone flights, including date, time, location, flight paths, and call summaries. Examples of this information appear in the exhibits to the Petition at Ex 9, pp. 123-286, and at Ex 11, pp. 491-493.

Drones can record video activities that individuals consider private. Because drones are small and can fly into areas where people are accustomed to privacy, individuals may not realize

that their private activities are being recorded. Hence, footage from drone calls is likely to contain data for which residents have a reasonable expectation of privacy. [Exs 20-21, pp. 2623-2650] (See also Note: *Beyond the Fourth Amendment: Limiting Drone Surveillance Through the Constitutional Right to Informational Privacy* (2013) 74 Ohio St. L.J. 669.)

B The Trial Court's Ruling

The trial court issued a tentative statement of decision after reviewing the extensive evidence and briefing submitted by the parties. [Ex 31, pp. 2846-2849] It then held a lengthy hearing where the parties discussed the tentative ruling, and argued their positions. [Ex 35, pp. 2857-2929] On April 10, 2023, the trial court issued its final ruling, in which it found that the videos from the drone flights were "categorically exempt under Government Code section 7923.600" as investigatory records. [Ex 34, p. 2852] It rejected Mr. Castañares's analogy to a system that automatically captured images of license plates, noting:

> Here, by contrast, it is undisputed that the drones in Chula Vista are only deployed in response to a call for service; in other words, what the drones do above Chula Vista is in no way "automatic." Indeed, petitioner acknowledged 1) that the decision to deploy a drone is the result of a sworn officer's exercise of discretion after a call for service is received; and 2) that after deployment, the drones are controlled by a human being.

It went on to reject another of Mr. Castañares's arguments:

> No more persuasive is petitioner's contention that the footage from takeoff to incident, and from incident to return to base, is not an investigatory record as it consists merely of overflight without focused attention on the incident giving rise to the call for

> service. Any decision by the City to record anything less than the full flight would risk exclusion at trial, or at least a defense assertion that something important was omitted. In other words, the "to and from" portions of the footage are important for completeness, and do not render the entirety of the footage any less an "investigative record."

[Ex 34, p. 2853]

As a separate ground for decision, the trial court found that the request "seeks to impose an unreasonable burden on the City's resources with no substantial countervailing benefit given the wealth of information already turned over by the City to petitioner." [Ex 34, p. 2853]

C Argument

1 The exemption for records of investigations should include the video footage from Chula Vista's drone program.

Section 7923.600 provides that the CPRA "does not require the disclosure of records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of, the office of the Attorney General and the Department of Justice, the Office of Emergency Services and any state or local police agency." As the Third District Court of Appeal has explained, "The reasons for this law enforcement investigation exemption are obvious. The exemption protects witnesses, victims, and investigators, secures evidence and investigative techniques, encourages candor, recognizes the rawness and sensitivity of information in criminal investigations, and in effect makes such investigations possible." (*Dixon v. Superior Court* (2009) 170 Cal.App.4th 1271, 1276.)

The material exempted by section 7923.600 include records from "those investigations undertaken for the purpose of determining whether a violation of law may occur or has occurred." (*Haynie*, *supra*, 26 Cal.4th at p. 1071.) The City's evidence showed, and the trial court found, that the drones are dispatched only in response to a call for service, and only after a sworn officer has exercised his or her discretion to decide that deployment is appropriate. [Ex 34, p. 2853] As Captain Foxx explained: "Officers treat every call for service, at least initially, as a response to investigate a whether a potential crime occurred or may occur. Of course, that does not mean that every call for service results in an officer detecting a crime or an arrest, but every call has that potential, and an officer cannot rule out a crime or violation of law without first conducting a preliminarily investigation." [Ex 11, p. 490:22-26]

If accepted, Mr. Castañares's argument that the City *and* the trial court had to review all the footage in order for the exemption to apply would make a mockery of the "clear legislative intent that the determination of the obligation to disclose records requested from a public agency be made expeditiously." (*Filarsky v. Superior Court* (2002) 28 Cal.4th 419, 427.) Any police agency that uses video footage for investigative purposes would have to have sufficient staff to spend hours reviewing footage—over 1800 hours in this case. Trial courts presented with petitions to compel disclosure of such material would have to set aside other judicial work in order to have time

to make the necessary determinations. As the trial court in this case observed:

> Moreover, a contention that a court must conduct such a review would be colorblind to the realities of trying to run a civil trial department under current conditions. As the court has observed in numerous pretrial orders over the years, there are at most 5.5 hours of trial time in a typical trial day in Dept. 72. Thus, such a requirement would be the functional equivalent of seeking a 13 to 16 day trial on a legal issue the court considers not to be a close call. The court must consider this in relation to the 1100 other cases assigned to Dept. 72, as well as the substantial backlog of cases still awaiting trial as the result of the disruption caused by the closure suffered by the court at the outset of the COVID-19 pandemic.

[Ex 34, pp. 2853-2854]

2 Privacy rights outweigh the public interest in disclosure of raw footage from the drone program.

The Supreme Court has made clear that "public access to information must sometimes yield to personal privacy interests." (*City of San Jose v. Superior Court* (2017) 2 Cal.5th 608, 615. See also Cal. Const., art. I, § 3 ("Nothing in this subdivision [regarding the right of access to information] supersedes or modifies the right of privacy guaranteed by Section 1 or affects the construction of any statute, court rule, or other authority to the extent that it protects that right to privacy"); Gov. Code, § 7921.000 ("the Legislature, mindful of the right of individuals to privacy, finds and declares that access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in this state").)

The CPRA contains many provisions protecting against disclosure of private information.[1] If one of those specific protections does not apply, the "catchall" exemption found in section 7922.000 may still shield the private information from public release, based on a balancing of the interest in the particular disclosure and the interest in protecting the privacy of those who would be affected by the disclosure. (*San Jose*, *supra,* 74 Cal.App.4th at p. 1018. See also *American Civil Liberties Union Foundation v. Superior Court* (2017) 3 Cal.5th 1032, 1043 ("Whether such an overbalance exists may depend on a wide variety of considerations, including privacy").)[2]

Collection of video footage by law enforcement agencies (whether from drones, from body cams and dashboard cameras, or from surveillance equipment maintained by private parties) raises privacy concerns. "Video footage has a unique potential to invade personal privacy, as well as to jeopardize other important public interests that the PRA's exemptions were designed to

---

[1] See e.g., Gov. Code, §§ 7926.300; 7924.100-7924.110; 7924.005; 7927.700; 7925.000; 7927.100; 7925.005; 7924.505; 7927.000; 7923.800; 7923.805; 7925.010; 7923.700; 7926.100; 7929.400; 7929.415; 7929.420; 7929.425; 7927.415; 7927.405; 7929.600; 7924.300-7924.335; 7928.300; 7924.000; 7927.005; 7924.500; 7929.610; 7927.605; 7927.410; 7923.755; 7926.400-7926.430; 7927.400; 7928.200-7928.230; 7922.200; 7927.105; 7928.005 & 7928.010.

[2] Section 7922.000 provides: "An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division, or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

protect." (*National Lawyers Guild v. City of Hayward* (2020) 9 Cal.5th 488, 508.)

Local governments that release information without taking precautions to protect the privacy of those identified in the material risk liability for substantial damages awards. The millions awarded to Kobe Bryant's widow following the release of photographs from the scene of the crash that killed her husband is the most recent visible evidence of that risk.[3] There have been other recoveries. For example, in 2011, a jury awarded a Calaveras County employee $524,460, on his claim that the County invaded his privacy by releasing documents from his personnel file in response to public records requests. (*Waller v. Bd. of Supervisors of Calaveras County* (Feb. 11, 2011) 2011 Jury Verdicts LEXIS 15392.)

Because video footage is likely to contain images that intrude on privacy interests, such material cannot be released in response to a public records request unless it is reviewed first. In some instances, that may be easy to do. But, where hours and hours of footage would have to be reviewed at great cost to the government agency, disclosure should not be compelled, particularly if the agency has disclosed a substantial amount of information about the subject of the request. (See *City of San Jose v. Superior Court* (1999) 74 Cal.App.4th 1008, 1023-1024.)

---

[3] Abrams, *Vanessa Bryant Is Suing L.A. County Over Kobe Bryant Crash Photos: What to Know*, N.Y. Times (Feb. 28, 2023). Available at https://www.nytimes.com/article/kobe-vanessa-bryant-lawsuit.html (last visited Aug. 28, 2023).

Here, the City provided a substantial amount of information about its drone program, including minute details about each flight. Mr. Castañares has not identified a strong countervailing interest that could not be satisfied with the information that he has already received.

3 Trial courts have the discretion under the CPRA to refuse disclosure where compliance would impose an unreasonable burden on local government resources.

The CPRA provides portions of a public record should be made available if the exempt portion of the record is "reasonably segregable," and can be deleted. (Gov. Code, § 7922.525.) If the exempt material is not reasonably segregable, the record may be withheld in its entirety. (*American Civil Liberties Union Foundation v. Deukmejian* (1982) 32 Cal.3d 440, 453 (reversing an order to disclose law enforcement index cards because the burden of segregating exempt information "would be substantial").) The Supreme Court has also recognized that "[r]edacting exempt footage can be time-consuming and costly." (*National Lawyers Guild*, *supra*, 9 Cal.5th at p. 508.) "When weighing the benefits and costs of disclosure, any expense or inconvenience to the public agency may properly be considered." (*Bertoli v. City of Sebastopol* (2015) 233 Cal.App.4th 353, 372.)

Here, the City provided unrebutted evidence that compliance with Mr. Castañares's request would require hundreds of hours of employee time to review the footage and redact any material containing information exempt from the CPRA either as a record of a law enforcement investigation, or because it intrudes on protected privacy interests. That should be

sufficient under the standards laid down by the Supreme Court and other Courts of Appeal to justify denying disclosure of the video footage.

D Conclusion

The California Constitution, the CPRA and decisions from the Supreme Court require that courts considering petitions to enforce disclosure obligations under the CPRA must balance the public's interest in disclosure against the right of individuals to privacy, the need to protect the integrity of law enforcement investigations, and the need to avoid overburdening public agencies. The trial court carefully considered the hundreds of pages of evidence and argument submitted by the parties and made a reasonable decision that properly balanced those interests. Therefore, this Court should deny Mr. Castañares's petition for an extraordinary writ.

/Calvin House
Gutierrez, Preciado & House, LLP
Attorneys for Amici Curiae
League of California Cities and
the International Municipal
Lawyers Association

Certificate of Compliance

Counsel of Record hereby certifies that, pursuant to Rule 8.204 (c)(1) of the California Rules of Court, the enclosed Respondents' brief is produced using 13-point Century Schoolbook type including footnotes and contains approximately 3,275 words, which is less than the total words permitted by the Rules of Court. Counsel relies on the word count of the computer program used to prepare this brief.

/Calvin House
Gutierrez, Preciado & House, LLP
Attorneys for Amici Curiae
League of California Cities and
the International Municipal
Lawyers Association

PROOF OF SERVICE (Court of Appeal)

[x] **Mail** [x] **Personal Service**

Notice: This form may be used to provide proof that a document has been served in a proceeding in the Court of Appeal. Please read *Information Sheet for Proof of Service (Court of Appeal)* (form APP-009-INFO) before completing this form. Do not use this form for proof of electronic service. See form APP-009E.

Case Name: Castanares v. Superior Court

Court of Appeal Case Number: D082048

Superior Court Case Number: 37-2021-00017713-CU-MC-CTL

1. At the time of service I was at least 18 years of age and **not a party to this legal action.**
2. My [ ] residence [x] business address is *(specify)*:
   Gutierrez, Preciado & House, LLP, 3020 E. Colorado Boulevard, Pasadena, CA 91107
3. I mailed or personally delivered a copy of the following document as indicated below *(fill in the name of the document you mailed or delivered and complete either a or b):*
   Applicatoin for Permission to File Amicus Curiae Brief; Brief Amicus Curiae

   a. [x] **Mail.** I mailed a copy of the document identified above as follows:

      (1) I enclosed a copy of the document identified above in an envelope or envelopes **and**

      (a) [ ] **deposited** the sealed envelope(s) with the U.S. Postal Service, with the postage fully prepaid.

      (b) [x] **placed** the envelope(s) for collection and mailing on the date and at the place shown in items below, following our ordinary business practices. I am readily familiar with this business's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service, in a sealed envelope(s) with postage fully prepaid.

      (2) Date mailed: September 1. 2023

      (3) The envelope was or envelopes were addressed as follows:

      (a) Person served:
      (i) Name: San Diego Superior Court
      (ii) Address:
      for Hon. Timothy Taylor
      330 West Broadway
      San Diego, CA 92101

      (b) Person served:
      (i) Name:
      (ii) Address:

      (c) Person served:
      (i) Name:
      (ii) Address:

      [x] Additional persons served are listed on the attached page *(write "APP-009, Item 3a" at the top of the page).*

      (4) I am a resident of or employed in the county where the mailing occurred. The document was mailed from (city and state): Pasadena, California

Form Approved for Optional Use
Judicial Council of California
APP-009 [Rev. January 1, 2017]

Case Name:	Court of Appeal Case Number:
	Superior Court Case Number:

3. b. ☐ **Personal delivery.** I personally delivered a copy of the document identified above as follows:

(1) Person served:
(a) Name:
(b) Address where delivered:

(c) Date delivered:
(d) Time delivered:

(2) Person served:
(a) Name:
(b) Address where delivered:

(c) Date delivered:
(d) Time delivered:

(3) Person served:
(a) Name:
(b) Address where delivered:

(c) Date delivered:
(d) Time delivered:

☐ Names and addresses of additional persons served and delivery dates and times are listed on the attached page *(write "APP-009, Item 3b" at the top of the page)*.

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

Date: September 1, 2023

Calvin House
(TYPE OR PRINT NAME OF PERSON COMPLETING THIS FORM)

(SIGNATURE OF PERSON COMPLETING THIS FORM)

For your protection and privacy, please press the Clear This Form button after you have printed the form.

Print this form | Save this form | Clear this form