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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

CALIFORNIA ALLIANCE FOR RETIRED AMERICANS, a California nonprofit corporation, JUAN PARRINO, an individual, and SAM SAIU, an individual,

Plaintiffs and Petitioners,

v.

SHIRLEY WEBER, in her official capacity as CALIFORNIA SECRETARY OF STATE,

Defendant and Respondent.

Case No. 24STCP02062

PLAINTIFFS' MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO MOTION OF NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE, CALIFORNIA REPUBLICAN PARTY, AND REPUBLICAN NATIONAL COMMITTEE FOR LEAVE TO INTERVENE

Date: August 22, 2024
Time: 1:30 PM
Dept: 86
Judge: Hon. Curtis Kin

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INTRODUCTION

In this case, two individual voters and a nonpartisan, social welfare organization have sued the California Secretary of State, contending that California's Signature Verification Law violates Article II, section 2.5 of the California Constitution, which unequivocally requires ballots to be counted if they are cast in accordance with state law. The Republican National Committee, National Republican Congressional Committee, and California Republican Party (the "Republican Committees") have sought leave to intervene because they apparently think the Signature Verification Law is good policy, and they would like to see the Court uphold it. But such a generalized political interest cannot support mandatory or permissive intervention under Code of Civil Procedure section 387, which requires a direct interest in the subject of the action and a showing that the proposed intervenor is "so situated that the disposition of the action *may impair or impede [the proposed intervenor's] ability to protect* that interest." Cal. Civ. Proc. Code § 387(d) (emphasis added).

The Republican Committees' claimed interest in "maintaining the competitive environment," Republican Committees' Memorandum of Points and Authorities ("Mem.") at 9, is misplaced: the relief that Plaintiffs seek would have no direct impact on the competitive environment—nor would it have any impact on how Republican voters vote, how Republican candidates campaign, how Republican supporters fundraise, or how other parties compete with Republicans in California. It will simply prohibit the arbitrary rejection of ballots cast by voters after the fact, based on perceived signature issues. Nor is there any evidence that the Signature Verification Law affords any particular party or candidate an advantage. As the Republican Committees themselves acknowledge, "each of the state's 22 million voters," from all political parties, will receive a mail ballot this fall. Mem. at 6. And Plaintiffs seek to enjoin the Signature Verification Law to ensure that *all* lawful ballots are counted—no matter the partisan affiliation of the voters who cast them. The Republican Committees' interest is accordingly nothing more than a consequential, generalized interest that is insufficient for intervention under California law. As such, it does not entitle them to any right to intervene in this case.

Moreover, to the extent the Signature Verification Law needs a defender, it already has one.

The Republican Committees have not provided any reason to believe that the Secretary of State will not ably defend the Republican Committees' generalized interest in the continued operation of a California statute. Nor is there any reason to believe that the parochial interests of a particular political party will play into the defense of the Signature Verification Law—where the only question raised by this case is whether the Signature Verification Law violates Article II, Section 2.5 of the California Constitution. The Secretary is more than capable of addressing that question, and the Republican Committees provide no reason to doubt that. Nor would the Republican Committees add anything beyond duplicative filings, redundant argument, and partisan politicization. The motion to intervene should be denied, whether as of right or permissively.

ARGUMENT

I. The Republican Committees do not satisfy the standard for intervention as of right.

The Republican Committees bear the burden of satisfying each of the following requirements to intervene as a matter of right: they must (1) make a "timely application;" (2) "claim[] an interest relating to the property or transaction that is the subject of the action;" (3) show that they are "situated that the disposition of the action may impair or impede [their] ability to protect that interest;" and (4) show that their interests are not already "adequately represented by one or more of the existing parties." Cal. Civ. Proc. Code § 387(d)(1)(B); *see also Accurso v. In-N-Out Burgers*, 94 Cal. App. 5th 1128, 1136–37, 313 Cal. Rptr. 3d 51, 60 (2023), as modified (Sept. 25, 2023). Failure to satisfy any one of these requirements provides an independent basis to deny intervention. *See Socialist Workers etc. Committee v. Brown*, 53 Cal. App. 3d 879, 892 (1975).

Plaintiffs do not contest the timeliness of the Motion to Intervene, but the Republican Committees fail to meet any of Rule 387's other three requirements: they have not identified a direct interest related to this action; the interests they have identified would not be impaired by the disposition of this case; and the Republican Committees' purported interests are already adequately represented by the Secretary of State.

A. The Republican Committees have not identified a direct interest in this action.

"Not every interest in the outcome of litigation gives to its possessor the right to intervene." *Hinton v. Beck*, 176 Cal. App. 4th 1378, 1383, 98 Cal. Rptr. 3d 612, 615 (2009). Rather, the

Republican Committees must demonstrate a "direct rather than consequential" interest in the subject of this lawsuit to intervene. *City & County of San Francisco v. State of California*, 128 Cal. App. 4th 1030, 1037, 27 Cal. Rptr. 3d 722, 727 (2005). A direct interest is one "where the judgment in the action *of itself* adds to or detracts from [the movant's] legal rights without reference to rights and duties not involved in the litigation." *Id.* (emphasis added). By contrast, an interest is merely "consequential" and does *not* merit intervention where "the results of the action may indirectly benefit or harm its owner." *Id.*

Here, the Republican Committees fail to show that the impact of any judgment in this case would directly affect them or their members; instead, any impact would be purely consequential. The Signature Verification Law is an election procedure performed by election officials after voted ballots are received—and any judgment in this action will not add or detract from the Committees' legal rights in and of itself. It would not affect the laws governing how the Republican Committees' members vote, how their candidates run, how their supporters fundraise, or how other parties compete with them. Instead, the Republican Committees have stated nothing more than a "bare political interest in the law," which they deem as good policy, but that interest alone is "not sufficient to support intervention." *City & Cnty. of San Francisco*, 128 Cal. App. 4th at 1039–40, 27 Cal. Rptr. 3d at 729–30. Put differently, the Republican Committees are "in the same position as all Californians" who may have a view on the wisdom of the Signature Verification Law—which is too "indirect and inconsequential to support intervention." *Id.*

In lieu of a direct interest in the outcome of this suit, the Republican Committees essentially argue that political parties are automatically entitled to intervene in any lawsuit which touches the "competitive environment" of elections in any way. Mem. at 6. But the support that they offer for this proposition falls apart upon closer scrutiny. California courts have been clear that the right to intervene is never absolute; it follows "only if the petitioner shows facts which satisfy the requirements of the statute." *Socialist Workers etc. Comm.*, 53 Cal. App. 3d at 891, 125 Cal. Rptr. at 923. Plaintiffs do not deny that there are many cases where the judgment threatens to directly impact candidates or supporters of political parties and, therefore, their intervention is appropriate; indeed, such interventions are often unopposed. But the Republican Committees' bald and blanket

claim that "courts routinely allow political parties to intervene in litigation where candidates' interests, voters' interests, and election integrity are at stake," Mem. at 7, far overstates the matter.

This is particularly true as to the Republican Committees' generalized claim to an interest in "election integrity"—the primary interest upon which Republican Committees must rely here—because the basic operation of the Signature Verification Law does not directly impact the competitive environment, or how Republican voters exercise their right to vote. Indeed, the Republican Committees do not cite a single case where a court held that an interest in "election integrity" justifies the intervention of a political party. Instead, there is a "veritable tsunami" of cases holding that broad concerns about "election integrity" or "illegal ballots" are merely generalized grievances that neither confer standing nor entitle a party to intervention as of right. *O'Rourke v. Dominion Voting Sys. Inc.*, No. 20-CV-03747-NRN, 2021 WL 1662742, at *9 (D. Colo. Apr. 28, 2021) (collecting cases), *aff'd*, No. 21-1161, 2022 WL 1699425 (10th Cir. May 27, 2022); *Liebert v. Wis. Elections Comm'n*, 345 F.R.D. 169, 173 (W.D. Wis. 2023) (holding that "the integrity of the election process" is "not a 'direct, significant and legally protectable interest'") (quoting *Bost v. Ill. State Bd. of Elections*, 75 F.4th 682, 686 (7th Cir. 2023)); *Paher v. Cegavske*, 457 F. Supp. 3d 919, 926 (D. Nev. 2020) ("Plaintiffs' purported injury of having their votes diluted due to ostensible election fraud may be conceivably raised by any [] voter."); *Bowyer v. Ducey*, 506 F. Supp. 3d 699, 712 (D. Ariz. 2020) (rejecting claim of vote dilution based in illegal votes because it raised only generalized grievances); *Donald J. Trump for President, Inc. v. Boockvar*, 493 F. Supp. 3d 331, 376 (W.D. Pa. 2020) (holding that plaintiffs, including the Republican National Committee, lacked standing to vindicate generalized election integrity interests); *Flying J., Inc. v. Van Hollen*, 578 F.3d 569, 571 (7th Cir. 2009) (holding that an intervenor's "interest" must be something more than the minimum injury required for Article III standing); *Common Cause Ind. v. Lawson*, No. 1:17-cv-03936-TWP-MPB, 2018 WL 1070472, at *4–5 (S.D. Ind. Feb. 27, 2018) (finding organization's claimed interests in "state control over structuring its own election system" and the state's "ability to conduct fair and robust elections" were "too generalized to afford a right to intervention under Rule 24(a), as they are the same for the proposed intervenor as for every registered voter in Indiana"); *Am. Ass'n of People with Disabilities v. Herrera*, 257 F.R.D. 236,

253 (D.N.M. 2008) ("[A]n interest in fair elections and the prevention of voter registration fraud . . . [is] too general an interest to form the basis of a rule 24(a) [sic] motion.").

In total, the Republican Committees identify thirteen[1] cases where political parties were granted intervention in election-related cases. Mem. at 7, 11 n.3. Only *three* of those cases—including one in which intervention was *unopposed*—are instances where the court granted intervention as of right under Federal Rule 24(a).[2] In the remaining *ten* cases only permissive intervention was granted; and, in five of those cases, intervention was either unopposed or the intervenor's interest in the lawsuit was undisputed.[3] However, as explained further in Section II, federal courts apply a "more lenient test" for permissive intervention than California courts, such that those cases are therefore "not determinative of whether intervention is proper under the stricter test of Code of Civil Procedure section 387." *City & Cnty. of San Francisco*, 128 Cal. App. 4th at 1043, 27 Cal. Rptr. 3d at 732–33.

Indeed, the cases the Republican Committees cite to support their mandatory intervention

[1] The Republican Committees cite four separate orders from a series of related suits challenging Florida's SB 90 (2021). Mem. at 7, 11 n.3 (citing *Fla. Rising Together v. Lee*, No. 4:21-cv-201, Doc. 52 (N.D. Fla. July 6, 2021); *Fla. State Conference of Branches & Youth Units of NAACP v. Lee*, No. 4:21-cv-187, Doc. 43 (N.D. Fla. June 8, 2021); *League of Women Voters of Fla. v. Lee* 2021 U.S. Dist. LEXIS 219547 (N.D. Fla. June 4, 2021); *Harriet Tubman Freedom Fighters Corp. v. Lee*, No. 4:21-cv-242, Doc. 34 (N.D. Fla. July 6, 2021)). Many of the orders are substantially similar, and one order merely incorporates the others. *Fla. Rising Together v. Lee*, No. 4:21-cv-201, Doc. 52 (N.D. Fla. July 6, 2021). These suits were all ultimately consolidated into a single proceeding. *League of Women Voters, et al. v. Lee, et al.*, 4:21-cv-186, 4:21-cv-187, 4:21-cv-201, 4:21-cv-242 (N.D. Fla. Dec. 8, 2021). In any event, intervention was only granted permissively in each instance.

[2] *See, e.g.*, *Paher v. Cegavske*, No. 3:20-CV-00243-MMD-WGC, 2020 WL 2042365, at *2 (D. Nev. Apr. 28, 2020) (granting an unopposed motion to intervene in case that would determine whether proposed intervenors' members would be able to vote by mail); *La Union del Pueblo Entero v. Abbott*, 29 F.4th 299, 307 (5th Cir. 2022) (granting intervention as of right) ("*LUPE*"); *Issa v. Newsom*, No. 2:20-cv-1044-MCE-CKD, 2020 WL 3074351 (E.D. Cal. June 10, 2020) (same).

[3] *Citizens United v. Gessler*, No. 14-cv-2266, 2014 WL 4549001 (D. Colo. Sept. 15, 2014) (granting permissive intervention where the intervenors' interest in the lawsuit was undisputed); *Ariz. Democratic Party v. Hobbs*, No. 2:20-cv-01143, Doc. 60 (D. Ariz. June 26, 2020) (same); *Vote.org v. Byrd*, No. 4:23-cv-111, Doc. 85 (N.D. Fla. May 26, 2023) (granting permissive intervention where it was unopposed); *Ohio Democratic Party v. Blackwell*, No. 2:04-cv-1055, 2005 WL 8162665 (S.D. Ohio Aug. 26, 2005) (same); *Mi Familia Vota v. Hobbs*, No. CV-21-01423-PHX-DWL, Doc. 53 (D. Ariz. October 4, 2021) (same); *Swenson v. Bostelmann*, No. 20-cv-459, Doc. 38 (W.D. Wis. June 23, 2020) (granting permissive intervention); *Nielsen v. DeSantis*, No. 4:20-cv-236, Doc. 101 (N.D. Fla. May 28, 2020) (same); *Kim v. Hanlon*, 99 F.4th 140 (3rd Cir. 2024) (same); *Ga. State Conference of NAACP v. Raffensperger*, No. 1:21-cv-1259, Doc. 40 (N.D. Ga. June 4, 2021) (same).

arguments here confirm that political parties are only entitled to intervention when they are directly affected by a lawsuit. In both *Paher v. Cegavske* and *Issa v. Newsom*, the motions for intervention as of right were granted because those cases would determine whether mail voting would be available during the COVID-19 pandemic to intervenors' members who otherwise would be unable to vote that way. *Paher*, 2020 WL 2042365, at *2; *Issa*, 2020 WL 3074351, at *3. Similarly, the Fifth Circuit granted intervention as or right in *LUPE* because the challenged law provided "new rights" and "new remedies" to partisan poll observers—which would be lost if the plaintiffs prevailed. 29 F.4th at 307. Here, in contrast, Plaintiffs' claims do not affect how California voters cast their ballot or access the franchise; rather, the requested relief would merely enjoin a ballot processing practice that is performed by election officials after voters have cast their ballots in compliance with California law. Nor could this suit affect the rights and remedies of poll observers in California because they play no role in voters' compliance with state law. *See* Cal. Elec. Code § 15104 (only permitting poll observers to challenge the procedural compliance of election officials).

In their motion, the Republican Committees frequently repeat the conclusory claim that Plaintiffs' lawsuit "could . . . disrupt the competitive electoral environment," without any specifics as to how or why it would do so. Mem. at 2; *see also id.* at 6, 9, 10. But a "competitive" injury must be supported by a plausible allegation or showing of an "ongoing, unfair advantage." *Mecinas v. Hobbs*, 30 F.4th 890, 898 (9th Cir. 2022). For instance, *Shays v. FEC*, 414 F.3d 76, 85 (D.C. Cir. 2005), held that two Congressmen could intervene in the case because they would face "intensified competition" under the FEC rules challenged in the litigation. And in *Issa v. Newsom*, Nos. 2:20-cv-01044-MCE-CKD, 2020 WL 3074351 (E.D. Cal. June 10, 2020), the political party organizations were granted intervention based on articulated interests of "asserting the rights of their members to vote safely without risking their health" and "advancing their overall electoral prospects." Nothing about Plaintiffs' requested relief would establish the kind of unfair advantage that is needed to establish a competitive injury.

In sum, because any impact of this litigation on the Republican Committees' interests would be entirely consequential, they are not entitled to intervention as of right. Indeed, should Plaintiffs prevail, the impact on the Committees may well be positive—since all California voters are sent

mail ballots, voters who support Republican candidates, too, would seem to have an interest in avoiding the rejection of their ballots due to arbitrary signature verification decisions. What the Republican Committees do not have is a direct legal interest in having other voters' ballots arbitrarily rejected, simply because the Committees fear voters may not support their candidates. The Committees cite no authority that holds otherwise. Nor could they, because such an interest would be entirely illegitimate and contrary to basic tenants of our democracy. For these reasons alone, both permissive and mandatory intervention should be denied.

B. The purported interests identified by the Republican Committees are not implicated by this action.

Even though the Republican Committees' bear the burden of proof in establishing their "entitlement to party status," all they can offer in support of their motion is speculation. *Accurso*, 94 Cal. App. 5th at 1136–37, 313 Cal. Rptr. 3d at 60. The Republican Committees' brief is replete with concerns about what Plaintiffs' requested relief "may require," Mem. at 9, "may affect," *id.*, "could . . . alter," *id.*, "could subject," *id.* at 10, "could threaten," *id.*, "could allow," *id.*, or "may make" happen, *id.* But the Republican Committees have not provided *any* factual support for these tentative allegations. Indeed, the Republican Committees' papers are facially deficient because, rather than *proving* they are entitled to party status, "the only allegations with respect to the factual issue[s] in question are on information and belief." *Olson v. Hopkins*, 269 Cal. App. 2d 638, 644, 75 Cal. Rptr. 33, 37 (Ct. App. 1969).

The Republican Committees have identified the hypothetical possibility that the party may increase "their expenditure of resources towards . . . voters, volunteers, and election observers," or that they may "engag[e] in a sharper focus on ensuring California counties are sufficiently purging voter rolls." Mem. at 9–10. But these speculative possibilities—which have nothing to do with the Signature Verification Law—are just a euphemistic repackaging of the same generalized "election integrity" interest that courts have repeatedly rejected. Put another way, "there is no doubt the [Republican Committees] strongly believe" in the Signature Verification Law as an election integrity measure, but their potential dedication of "energy and resources" to that issue does "nothing to change the fundamental nature of this interest, which is philosophical or political." *City*

& Cnty. of San Francisco, 128 Cal. App. 4th at 1039, 27 Cal. Rptr. 3d at 729.

What's more, the Republican Committees do not even have a factual basis to suggest that election integrity *would* be impaired by Plaintiffs' suit. Again, the Republican Committees speculate that an injunction against the Signature Verification Law "could allow . . . illegal ballots to be counted, potentially changing the results of elections," or that a resulting "loss of confidence" in elections "may make it less likely that the Republican Committees' voters will vote." Mem. at 10 (cleaned up). But there is no reason or evidence to believe either of those claims. Indeed, they make no sense: Plaintiffs have brought only a single claim under Article II, section 2.5—which, by its terms, protects only legal ballots that were "cast in accordance" with state law. Moreover, there is no evidence that the Signature Verification Law does anything to identify or exclude illegal ballots. Compl. ¶ 9. And in their motion to intervene, Republican Committees point to none. Even if one were to credit their baseless claims about illegal ballots or voter confidence, they are nothing more than generalized concerns shared by everyone—including the Secretary. These universal concerns do not entitle the Republican Committees to party status.

C. The Republican Committees' generalized interest is adequately represented by the Secretary of State.

The Republican Committees also have not distinguished their generalized interest in upholding the Signature Verification Law from that of the Secretary's counsel—the Attorney General—who is obligated to defend any case where a state officer is a party. *See* Cal. Gov. Code § 12512. Their motion can be denied on this ground alone.

The Republican Committees argue that the Secretary cannot represent their partisan interests in "electing particular candidates" and point to topics on which they may theoretically disagree with the Secretary in the future—such as litigation expenses, the "social and political divisiveness of the election issue," and the "interests of opposing parties." Mem. at 12–13. But the Republican Committees do not even attempt to explain how those potential disagreements would alter the Secretary's defense of the Signature Verification Law at all, let alone in a meaningful way. Indeed, all of the cases the Republican Committees cite in support of this argument are readily distinguishable from this one. In *Clark v. Putnam County*, the court held that "[i]n negotiating a

new [redistricting] plan [the county] commissioners" would not adequately "represent the interest of the black interveners to have an opportunity to elect the commissioner of their choice" in the first place. 168 F.3d 458, 462 (11th Cir. 1999). In *Meek v. Metro. Dade Cnty., Fla.*, the court held that the proposed intervenors were entitled to intervene to appeal where the government defendant had "decided not to appeal." 985 F.2d 1471, 1478 (11th Cir. 1993). And in *In re Sierra Club*, the court held that Sierra Club's interests were not adequately represented by a state agency, noting that they had "already taken opposing positions" in the litigation. 945 F.2d 776, 780 & n.9 (4th Cir. 1991). None of those circumstances are present here.

II. The Republican Committees do not satisfy the standard for permissive intervention.

The Court should also decline to grant permissive intervention. Under the California Rules of Procedure, the Court may only permit intervention if the Republican Committees have "an interest in the matter in litigation, or in the success of either of the parties, or an interest against both." Cal. Civ. Proc. Code § 387(d)(2). As with intervention as of right, "[t]o support permissive intervention, it is well settled that the proposed intervener's interest in the litigation must be direct rather than consequential, and it must be an interest that is capable of determination in the action." *City & Cnty. of San Francisco*, 128 Cal. App. 4th at 1037, 27 Cal. Rptr. 3d at 727.

California's permissive intervention rule operates in stark contrast to the "more lenient" federal permissive intervention rule, which does *not* require the intervening party to have an interest in the underlying case. *Id.* at 1043. Federal intervention may be permitted if an intervenor merely raises a common issue of law or fact. Fed. R. Civ. P. 24(b). However, while California's mandatory intervention rule was added to largely model the federal equivalent, the distinctly higher permissive intervention standard was deliberately preserved. *Accurso*, 94 Cal. App. 5th at 1138–39, 313 Cal. Rptr. 3d at 61–62 ("permissive intervention . . . essentially carries forward the discretionary regime on which section 387 was originally founded"). The Republican Committees have not met that higher standard because they do not have a direct interest in this action and, therefore, cannot be permitted to intervene. *See supra* at Section I.A.

Even if the Republican Committees had established a direct interest in this case, the Court

should still exercise its discretion to deny intervention. *People v. Superior Ct.*, 17 Cal. 3d 732, 737, 552 P.2d 760, 763 (1976) ("[A] trial court possesses discretion to deny intervention even when a direct interest is shown if the interests of the original litigants outweigh the intervenors' concerns of potential delay and multiplicity of actions."). This Court "may consider whether intervention would be unnecessary, duplicative, or redundant when denying a motion to permissively intervene." *State Water Bd. Cases*, 97 Cal. App. 5th 1035, 1050, 316 Cal. Rptr. 3d 170, 180 (2023), *review denied* (Mar. 20, 2024). Indeed, the core purpose of intervention is "to obviate delay and multiplicity of actions by creating an opportunity to those directly interested in the subject matter to join in an action already instituted." *Id.* at 1045 (quotations omitted). But here, there is no risk of duplicative or follow-on litigation if the Republican Committees are denied intervention because they do not seek to pursue their own claims, they merely seek to defend against an already existing lawsuit. By contrast, permitting the Republican Committees' intervention would enlarge the issues in the litigation by introducing "unnecessary partisan politics into an otherwise nonpartisan legal dispute." *Miracle v. Hobbs*, 333 F.R.D. 151, 156 (D. Ariz. 2019) (cleaned up) (denying intervention to Republican legislators). This is an appropriate basis on which to deny permissive intervention. *Id*.

There is simply no compelling reason to make the Republican Committees a "party to the action, with all of the same procedural rights and remedies" of a defendant who was themselves sued. *Carlsbad Police Officers Ass'n v. City of Carlsbad*, 49 Cal. App. 5th 135, 148–49, 262 Cal. Rptr. 3d 646, 657 (2020). Even if there is a conceivable benefit to soliciting the viewpoints of the Republican Committees, those can always be provided "through amicus curiae briefs." *City & Cnty. of San Francisco*, 128 Cal. App. 4th at 1044, 27 Cal. Rptr. 3d at 734.

CONCLUSION

For the foregoing reasons, the Republican Committees' motion for leave to intervene should be denied.

Dated: August 9, 2024

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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 eighteen years and not a party to the within action. On the date herein below specified, I served the foregoing document described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as indicated herein below.

DATE OF SERVICE : August 9, 2024

DOCUMENT(S) SERVED : PLAINTIFFS' MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO RNC'S MOTION FOR LEAVE TO INTERVENE

PARTIES SERVED : SEE ATTACHED SERVICE LIST

____ (BY MAIL AS FOLLOWS): I placed the envelope for collection and processing for mailing following this firm's ordinary practice with which I am readily familiar. On the same day correspondence is placed for collection and mailing, they are deposited in the ordinary course of business with the United States Postal Service.

____ (VIA FACSIMILE): I sent via facsimile the above described documents to the offices of the addressee(s) as indicated. The transmission was reported as successful immediately following complete transmission.

____ (VIA EMAIL): I caused above-referenced documents to be emailed to the addressee at the following email addresses:

Said email was reported complete and without error.

XXX (VIA ELECTRONIC SERVICE): Pursuant to agreement by the parties, by electronically transmitting the above document(s) via electronic mail, pursuant to court order or agreement by the parties, to the persons at the electronic mail addresses listed on the attached Service List. To my knowledge, the transmission was reported as complete and without error.

____ (BY PERSONAL SERVICE): I caused to be delivered such envelope(s) by hand to the offices of the addressee(s).

* * *

XXX (STATE): I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

____ (FEDERAL): I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

EXECUTED at Los Angeles, California on August 9, 2024.

Omar Qureshi

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