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6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **FOR THE COUNTY OF LOS ANGELES**

8 SAVE PV SCHOOLS, LLC, an organization.

9 *Plaintiff/Petitioner.*

10 vs.

11 LOS ANGELES COUNTY DEPARTMENT OF
PUBLIC HEALTH; PALOS VERDES
12 PENINSULA UNIFIED SCHOOL DISTRICT;
DOES 1-30.

13 *Defendants/Respondents.*
14

) Case No.: 21TRCV00895

)
) **PETITIONER'S RESPONSE TO ORDER**
) **TO SHOW CAUSE RE: DISMISSAL**

)
) Judge: Hon. Gary Y. Tanaka
) Location: Torrance Courthouse (Dept. B)
) Action Filed: December 15, 2021
) Hearing Date: September 15, 2023, 8:30AM
)
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)

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2 Petitioner Save PV Schools, LLC respectfully submits this response to the Order to Show
3 Cause re: Dismissal, scheduled for hearing on September 15, 2023 at 8:30AM. As stated herein, the
4 Court erred in its minute order of August 25, 2023, which sustained the demurrer without leave to
5 amend. Even conceding that challenges to the now-rescinded “universal mask mandate” are moot,
6 Petitioner’s Third Amended Petition (“TAP”) contained sufficient independent allegations against
7 Respondents LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH (herein, “County”
8 or “LACDPH”) and PALOS VERDES PENINSULA UNIFIED SCHOOL DISTRICT (herein,
9 “District” or “PVPUSD”) which are not moot as a matter of law, and which should properly be
10 adjudicated on the merits in a subsequent Writ of Mandate hearing.

11 **1. Legal Standard and Application**

12 A demurrer may only be sustained if a complaint fails to state a cause of action under any
13 possible legal theory. (Civ. Proc. Code § 430.10(e); *Fox v. Ethicon Endo-Surgery, Inc.* (2005) 25
14 Cal. 4th, 797, 810.) The function of a demurrer is to “determine whether the complaint states facts
15 sufficient to constitute a cause of action,” or whether any defects found “can be cured by
16 amendment.” (*Blank v. Kirwan* (1985) 39 Cal.3d 311, 318.)

17 On a demurrer, “the allegations must be liberally construed with a view to attaining
18 substantial justice among the parties.” (*Alliance Mortgage Co. v. Rothwell* (1995), 10 Cal.4th 1226,
19 1232.) The rule of liberal construction “means that [the] court draws inferences favorable to the
20 plaintiff, not the defendant.” (*Perez v. Golden Empire Transit District* (2012), 209 Cal.App.4th
21 1228, 1238). Even if some (or most) allegations in a complaint are moot, “if, intermingled with
such matters, there are averments of ultimate facts sufficient to constitute a cause of action, it [is]
error to sustain the demurrer.” (*M.G. Chamberlain Co. v. Simpson* (1959), 173 Cal.App.2d 263,
267.)

1 With respect to the First through Third Causes of Action, the question is whether Petitioner's
2 allegations contain "averments of ultimate facts" sufficient to satisfy a Writ of Mandate, and to
3 "compel the performance of an act [as] a duty resulting from an office" (Code Civ. Proc., § 1085),
4 "where there is not a plain, speedy, and adequate remedy, in the ordinary course of law" (*id.*, §
5 1086). The Court must analyze whether Petitioner sufficiently alleged a ministerial duty of
6 Respondents to which Petitioner has a clear and right to the performance thereof, under "any
theory" as alleged in the TAP.

7 As the Court noted in its original tentative ruling, posted March 1, 2023 (herein, "March
8 Tentative"), and referenced during oral argument, Petitioner sufficiently alleged facts to support a
9 Writ of Mandate with respect to, *inter alia*, SB 336 (2021) against the County (TAP, ¶¶ 27-28,
10 53-56), and with respect to the Brown Act (TAP, ¶¶ 20, 21, 66), and Public Records Act (TAP ¶46),
11 against the District. Importantly, these ministerial duties apply independently of any specific
12 "universal mask mandate." Because the Court's minute order on August 25, 2023 does not address
13 these dispositive facts,¹ nor explain why these allegations would not still demonstrate a valid cause
14 of action notwithstanding the rescinded mask mandate,² Petitioner (again) raises these points as part
15 of this Order to Show Cause re Dismissal and respectfully requests the Court allow them to be heard
16 on the merits. These causes of action clearly represent a live controversy whereby the Court can
17 still grant Petitioner "effective relief." (*Davis v. Fresno Unified School Dist.* (2020), 57 Cal.App.5th
911, 926-27.)

18 During the hearing on August 25, the Court admonished counsel for Petitioner that it was
19 not entitled to a Statement of Decision. Counsel apologizes for any misunderstanding or errors in

20 ¹ On the second page of its Minute Order, the Court summarizes Petitioner's allegations as that "Respondents failed to
perform ministerial duties in response to the COVID-19 pandemic, **including** the imposition of harmful mandatory
mask policies [and] that they **were not given proper notice** of [required] procedures." This fair and accurate summary
would readily encompass the SB336 allegations. However, no further analysis was made, and the Court erroneously
concluded that Petitioner's entire action was moot, without considering whether the notice allegations might still be live.

21 ² The Court's order claims that it "fully considered the arguments of all parties, both written and oral." (p.1). However,
considering the minute order did not state or summarize any of the oral or written arguments made by Petitioner's
counsel at the August 25 hearing, this statement must be inaccurate.

1 this regard. However, the Code of Civil Procedure requires that whenever a demurrer in any action
2 or proceeding is sustained, the court “shall include in its decision or order a statement of the specific
3 ground or grounds upon which the decision or order is based.” (Code Civ. Proc. § 472d.) Such
4 statement can, for example, include citations to “appropriate paragraphs” in the applicable points
5 and authorities (*E.F. Hutton Co. v. City National Bank* (1983), 149 Cal.App.3d 60, 65 n.1.) Here,
6 with regard to these allegations (cited *infra*), the Court's “failure to specify the grounds on which its
7 order sustaining the demurrer was based constituted error.” (*E.L. White, Inc. v. City of Huntington*
Beach (1978), 21 Cal.3d 497, 505 n.2.)

8 For the reasons stated in the previously filed and ill-fated Request for Statement of Decision,
9 by the Court’s March Tentative, and explained further herein, attaining substantial justice between
10 the parties requires the Court, at minimum, to allow the adjudication of these still-live causes of
11 action in a forthcoming Writ of Mandate hearing.

12 **2. The Court Erred by Failing to Recognize the Sufficiency of Allegations Against the** 13 **County in the TAP, Including, But Not Limited To, SB 336 (2021)**

14 On October 4, 2021, Governor Newsom signed SB 336 (2021) into law. (Health & Saf.
15 Code § 120120, *et seq.*; Petitioner’s Request for Judicial Notice, Exhibit A; TAP ¶27.) SB 336
16 requires LACDPH, before issuing any “jurisdictionwide local order related to COVID-19”, to
17 provide an “opportunity for local communities, businesses, nonprofit organizations, individuals, and
18 others to sign up for an email distribution list relative to changes to [each] order.” (Health & Saf.
19 Code § 120122(b)). When codifying the law as an emergency measure under Article IV of the
20 California Constitution, the Legislature found these provisions were necessary “in order to provide
21 **notice** [of] the necessary measures to protect public health, so that proper protocols may be
implemented.” (emphasis added) Because a “jurisdictionwide order” relating to COVID 19 is (and
has been) in effect this year in the County of Los Angeles (*see, e.g.* Order No. 2023-03-02 of the

1 Los Angeles County Health Officer, “COVID-19 Reporting Requirements,” issued March 30 and
2 revised July 5, 2023, and applying to K-12 schools), SB 336 remains applicable to LACDPH **at**
3 **least** until January 1, 2024.

4 As sufficiently alleged by Petitioner in the FAP (§§ 29, 68)), SAP (§§ 36, 37, 68-71) and
5 TAP (§§ 27-28, 53-56), LACDPH has continually failed to perform its ministerial dut(ies) under SB
6 336, to which Petitioner has a plain and beneficial right. As further shown in the Request for
7 Judicial Notice,³ the County has “change[d]” its relevant jurisdiction-wide health orders relating to
8 COVID-19 at least twenty (20) relevant times since SB 336 has been law, while its email
9 distribution list continually failed to provide **any notice** – let alone timely notice – of any of these
changes. (TAP §28; Petitioner’s Request for Judicial Notice, Exhs. B, C)

10 As the Court correctly concluded in its March Tentative, Petitioner sufficiently “alleged that
11 [the County] failed to meet its ministerial duties imposed by SB336 to provide Petitioner and others
12 similarly situated to obtain proper notice related to changes to health officers’ orders prior to its
13 enforcement.” (March Tentative.) This was one of the Court’s cited bases of properly overruling the
14 demurrer (in part). The Court (in March) was correct. It is well settled that a Writ of Mandate
15 requires a Court “determine whether [agency] action has failed to follow the procedure and **give the**
16 **notices required by law.**” (*Pitts v. Perluss* (1962), 58 Cal.2d 824, 833 [citing cases] (emphasis
17 added)). Such failure of notice, as alleged, is sufficient on its face to support the Writ of Mandate as
18 a matter of law.

19 ³ Petitioner recognizes that the Court denied Petitioner’s supplemental requests for judicial notice filed on June 7, 2023,
20 and August 18, 2023, on the basis that they do not show that “a renewal of the asserted wrongful conduct, as alleged
21 under the TAP, is or will be repeated and is likely to reoccur.” (Minute Order, p.5). The Court does not explain why it
granted Petitioner’s earlier request for Judicial Notice (Minute Order, p. 2). Because the previously filed (and granted)
Request for Judicial Notice contains sufficient references to support the SB 336 allegations, Petitioner asks the Court to
properly address these facts. Furthermore, because the Evidence Code Section 458 allows a Court to subsequently do
so, Petitioner respectfully requests the Court reconsider, or on its own motion, take judicial notice of the subsequent
“jurisdictionwide orders relating to COVID19” issued by the County, and changes thereof, to date, if not encompassed
by its previous order.

1 In its Supplemental Brief, the County contends its sole duty under SB336 is to make an
2 email distribution list “available”, regardless of whether the emails provide **any actual notice** of
3 any “changes to such order[s]”. (County Brief, p. 11-12; *cf.* HSC 120122(b)). The County
4 dismissively sniffs that Petitioner’s “quibbles with the content of [its] email notices cannot give rise
5 to mandamus”, and that requiring it to provide email notification as demanded by Petitioner (and
6 required by SB336) would be a “useless act” (County Brief, p. 6).

7 Not only do these arguments (properly interpreted) constitute triable issues for the Writ of
8 Mandate hearing, both as regulatory interpretation (*Yamaha Corp. of America v. State Bd. of*
9 *Equalization* (1998), 19 Cal.4th 1, 7) and statutory interpretation (*See, e.g. Freedom Newspapers,*
10 *Inc. v. Orange County Employees Retirement System* (1993), 6 Cal.4th 821), but the issue is clearly
11 not moot. As shown by judicially-noticeable facts, **a “jurisdictionwide order” relating to**
12 **COVID-19 is still in place today**, September 6, 2023 (as it was during the hearing on August 25,
13 2023), and the County (again) did not provide any (or sufficient) email notice for its issuance or
14 changes. Thus, in fact, the County’s actions (and legal arguments) make it not just “reasonably
15 likely”, but virtually certain that the “allegedly wrongful conduct will be repeated.” (*Center for*
16 *Local Government Accountability v. City of San Diego* (2016) 247 Cal.App.4th 1146, 1157.)

17 No matter how, when or whether the County’s new “jurisdictionwide orders” are rescinded
18 or modified (or simply continue to exist in perpetuity as all we learn to “live with COVID”), any
19 and all future changes inevitably must comply with SB 336. This is true even if a “universal mask
20 mandate” is never reimposed, and equally so if it is. Petitioner has plainly established a beneficial
21 right to the performance of this duty (or, in the alternative, the adjudication of these rights and
duties), making the allegations raised in the TAP clearly sufficient as a matter of law.

Even the Court’s observation, during the August 25 hearing, of the inconvenience imposed
by the hyperlinks provided by Petitioner’s counsel is a recognition of the same dynamics underlying
this mandatory duty which the Legislature imposed on the County. It remains a live question

1 whether SB 336 has, does or will require the County to do more than just essentially provide a
2 hyperlink to its own website, or whether its distributed emails need to provide its communities with
3 actual notice. As alleged in the TAP (and associated requests for judicial notice), the County's
4 repeated violations of SB 336 cause substantive damage which goes much deeper than mere
5 inconvenience.

6 On February 1, 2022, LACDPH announced a jurisdictionwide order establishing
7 (purportedly) precisely the "individualized, opt out" in schools as requested by Petitioner (and
8 others). (Supp. RJN, Ex. C, p. 24 (stating that close contacts "may be permitted to attend in-person
9 school" and should "contact [their] school to learn more")). On March 11, 2022, the County made
10 masks optional on a Countywide basis (Supp. RJN, Ex. I, K pp 73-87), only to arbitrarily
11 re-mandate them again a month later. (Supp. RJN, Ex. L). On August 11, 2022, it apparently
12 expanded exemptions for "pedagogical reasons." (Supp. RJN, Exh. J, p. 96). All the while, nary a
13 mention of any of these changes on the SB336-mandated "email distribution list." (Supp RJN,
14 Exhs. N-W). Had "local communities" like Petitioner's members (or say, the 30+ County
15 superintendents who would later write a letter asking for flexibility in the mandate's application in
16 their schools), all of whom routinely communicate, advocate and organize over email, been notified
17 of these changes relative to the order, prior to the mandate subsequently being (re)imposed to
18 apparently override this flexibility, perhaps this action never would have been necessary.
19 Unfortunately, this action is still necessary and a live controversy remains.

20 Exemplifying the confusion perpetuated by the County's continual noncompliance, on
21 September 6, 2022, the District's Superintendent wrote to LACDPH, along with twenty-four (24)
other district superintendents, stating that mask mandates in schools were "hard to manage" and
"unnecessary", and accordingly, asking that masks be "recommended" and not mandatory. (TAP
¶40) On September 8, 2022, LACDPH replied, stating that its "requirements apply to the school
setting the same as they do to all other public settings." (TAP ¶41; Petitioner's Request for Judicial

1 Notice, Exhibit D, p. 46). Thus, it appears that not even LACDPH itself was fully aware of the
2 dizzying vicissitudes in its own public health orders over the preceding months, having only been
3 unearthed by the diligent research of Petitioner (and counsel). These allegations and evidence,
4 *prima facie*, are more than sufficient to overrule the demurrer.

5 The residual damage from this repeated lack of SB 336 notice still manifests itself today in
6 the multiple County schools, again cited in supplemental requests for judicial notice, which rely on
7 outdated or ambiguous County guidance to impose mask mandates on children in the 2023-24
8 school year (Supp. Decl. of Jessica Locke).

9 The legal issues are clear-cut and plainly still ripe. To (again) answer the rhetorical question
10 posed in the County's briefs (and implicitly by the Court's Order to Show Cause re: Dismissal), yes,
11 a writ of mandate should issue to order the County to send the emails providing **notice** of the
12 **changes**, just like SB336 requires. (HSC §120122(b).) Not only because is this the law, consistent
13 with the Legislature's intent, but also is in the public interest (namely, knowledge and awareness of
14 changes to public health orders) to notify the interested public and communities. The only question
15 now is whether Petitioner has sufficiently alleged a cause of action on the same – a question that
16 must be answered in the affirmative. (*See, Pitts v. Perluss, supra; Cent. Coast Forest Ass'n v. Fish
& Game Comm'n* (2012), 211 Cal.App.4th 1433. (writ of mandate requires determination whether
17 agency provided "notice as required by law"))

18 **3. The Court Erred by Failing to Recognize the Sufficiency of Allegations Against the**
19 **District, Including But Not Limited To, the Brown Act and Public Records Act**

20 As noted by the Court's March Tentative, Petitioner alleged that on August 11, 2021, the
21 District "violated the Brown Act (Gov. Code 54954.3(a)) by excluding Petitioner's members from a
public meeting, and then instituting the challenged policy at that meeting." (TAP, ¶¶ 20, 21, 66.)
Neither the District nor the Court's minute order provides any explanation how these allegations

1 have now become moot by virtue of the County’s March 31, 2023 announcement. The Court’s
2 order simply conclusively states that the Demurrer is sustained against the District “for the same
3 reasons as stated [regarding LACDPH].” (Minute Order, p. 5) This is clearly prejudicial error.

4 The District didn’t even argue that the Brown Act allegations were mooted due to the
5 County’s actions, but instead contended that the only applicable Brown Act provision relates to
6 “past actions”, which requires notice within nine (9) months of the violation. (District Brief, p.5;
7 Gov. Code § 54960.2(a)(2)) However, even assuming, *arguendo*, that solely the “past action”
8 provision of the Brown Act applies, Petitioner already satisfied all requirements of this provision by
9 virtue of its *pro se* suit in federal court, filed on September 22, 2021. (See, *Sauter, et al v. Palos*
10 *Verdes Peninsula Unified School District*, 2:21-cv-07605-JVS-SP, (C.D. Cal.); Petitioner’s Request
11 for Judicial Notice, Exhibit D; Supp. RJN, Ex Y, p. 184; Petitioner’s Supp. Brief, pp. 9-10) While
12 this *pro se* suit requested relief on federal constitutional grounds, it named the District as a
13 defendant, mentioned the events of August 11, 2021, and provided timely equivalent notice by
14 expressly reserving allegations regarding the “Public Meetings Act” (p. 203; *cf.* Gov. Code §
15 54960.2.) Under the circumstances, as Petitioner argued in its supplemental brief, it would clearly
16 qualify for equitable tolling as a matter of law. (See, *e.g.*, *McDonald v. Antelope Valley Community*
17 *College Dist.* (2008), 45 Cal.4th 88, 100; (equitable tolling applies when an injured person “has
18 several legal remedies and, reasonably and in good faith, pursues one.”). The same principles would
19 likewise apply to this action, filed on December 1, 2021, as it referenced the August 11, 2021 events
20 in every stage of pleading. Unfortunately, the District (and the Court) ignored these points.

21 Most importantly, at the time that Petitioner filed its *pro se* case (and this action), the
challenged violation was still an “ongoing” action in the sense that the mask mandate was being
enforced in schools. Today, because the District’s public record of its August 11, 2021 meeting still
excludes the intentionally deleted comments of Petitioner’s membership, it still constitutes an
“ongoing” action under the Brown Act. (Gov. Code § 54960). As alleged, and as further shown

1 on the merits, Petitioner clearly qualifies for relief under the Brown Act. Petitioner has satisfied its
2 burden to defeat the demurrer and it is an egregious abuse of discretion for the Court to ignore these
3 sufficient allegations, points, facts and laws.

4 The District contends that it had no obligation to accommodate Petitioner's members or
5 even ensure that their public comments were included in the record of its August 11, 2021 meeting.
6 (District Brief, pp. 4-6) To the contrary, however, a quorum of Board Members had gathered for
7 official business specifically to hear public comment on the listed agenda item "School Mask
8 Policy." Comments made before and after Petitioner's members from the exact same location,
9 regarding the exact same policy, except for the content-based elimination of Petitioner's speech, are
10 readily visible in the public video, a lacuna obvious to any observer.⁴ The apparently intentional
11 manipulation of official recordings (an act which, only a few decades ago, infamously resulted in
12 presidential impeachment), is not an allegation to be taken lightly or to be dismissed without any
13 analysis on demurrer. Moreover, the applicable Executive Order (like the previous versions)
14 expressly requires the Board to allow the public to "observe **and address** the meeting." (emphasis
15 added) This is unquestionably sufficient for a Writ of Mandate, whether the ministerial duty is
16 construed from the Brown Act itself or the applicable Executive Order. (Petitioner's Brief, p. 10; cf.
17 E.O. N-08-21 (Board shall "allow members of the public to attend the meeting and offer public
18 comment"))

19 The TAP (and supporting Declarations) explains how these initial violations, perpetuated
20 and unchecked over time, caused additional injury to Petitioner's members (TAP ¶25 (members
21 forced to leave district and pay private school tuition), TAP ¶37 (discriminatory treatment against
student by teacher (Decl. of D. Keese, ¶¶5-10))). As also alleged in the TAP, the District violated
additional laws, by failing to respond to Petitioner's public records request (TAP ¶46; Gov. Code §

⁴ Notwithstanding the Court's disfavor for hyperlinks, there is no other way for Petitioner to furnish the video:
<https://www.savepvschools.com/post/censorship-at-the-school-board-meeting-on-august-11-2021> (video embedded at
link); The full video contains over 45 minutes of comments which are deleted from the version on the District website.

1 6253), for crucial data that would enable a safer school environment. (TAP ¶35; ¶19) Despite
2 ample opportunity to do, the District did not address these points in its briefs, and thus conceded
3 them. Because they satisfy the elements of a live cause of action, it is incumbent on the Court to
4 recognize them as such.

5 **4. Conclusion: In Response to the Order to Show Cause, The Court Must Allow the**
6 **TAP to Be Adjudicated on the Merits in a Writ of Mandate Hearing**

7 While the Court unfortunately did not address any of the above points, they were sufficiently
8 pled in the TAP, and, “liberally construed” (or construed at all), they should allow this action to
9 continue on the merits as a matter of law. Petitioner respectfully raises these points in response to
10 the order to show cause, and requests the Court modify its order or allow the action to continue with
11 a subsequent hearing on the Writ of Mandate.

12 In addition or in the alternative, the Court should grant this request as a motion to vacate
13 judgment, or motion for new trial. For the reasons stated, the Court’s order contained an “incorrect
14 or erroneous legal basis for [its] decision, not consistent with or not supported by the facts” (Code
15 Civ. Proc. § 663). In addition or in the alternative, it represented “error in law [and] excepted to by
16 the party making the application.” (Code Civ. Proc. § 657(7).) It is also well settled that a Court has
17 inherent authority to modify its own orders on its own motion based on a “change in law”. (Code
18 Civ. Proc. §1008(d)) Accordingly, Petitioner respectfully requests the Court do so on its own
19 motion, based on, *inter alia*, the July 5, 2023 change of law in Order 2023-03-02 of the Public
20 Health Officer, or allow leave for Petitioner to file such motions if necessary, to properly allow
21 Petitioner’s members their day in Court.

Respectfully Submitted,

Dated: September 6, 2023

/s/ Matthew Harrison

MATTHEW SEAN HARRISON, ESQ.
Attorney for Petitioner
Save PV Schools LLC

Save PV Schools, LLC vs. California Department of Public Health, et al.
Los Angeles County Superior Court Case No. 21TRCV00895

PROOF OF SERVICE
[CCP 1013A (3) and 2015.5]

I, the undersigned, am employed in the county of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 120 Vantis, Suite 300, Aliso Viejo, California, 92656.

On September 6, 2023, I caused to be served the following document(s) described as follows:

PETITIONER'S RESPONSE TO ORDER TO SHOW CAUSE

on the parties in this action by placing a true copy in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

- ☐ **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)
- ☐ **BY MAIL** - As follows: 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 Aliso Viejo, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY FAX** - As follows: I personally sent to the addressee's telecopier number a true copy of the above-described documents. Thereafter I sent a true copy in a sealed envelope addressed and mailed as indicated below.
- ☐ **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at Aliso Viejo, California.
- ☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION** - I caused the documents to be sent to the persons at the e-mail addresses listed below as agreed upon with counsel to constitute personal service.

Executed on September 6, 2023, at Aliso Viejo, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Matt Harrison

Save PV Schools, LLC vs. California Department of Public Health, et al.
Los Angeles County Superior Court Case No. 21TRCV00895

PROOF OF SERVICE
[CCP 1013A (3) and 2015.5]

SERVICE LIST

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