CASE NO. A170666

COURT OF APPEAL OF THE STATE OF CALIFORNIA
FIRST APPELLATE DISTRICT, DIVISION ONE

MELANIE GILLILAND,

Plaintiff and Appellant,

v.

CITY OF PLEASANTON,

Defendants and Respondents

On Appeal from a Judgment
of the Superior Court of California for Alameda County,
Hon. Jenna Whitman, Judge, Case No. RG18924833

APPLICATION OF LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES TO FILE *AMICI CURIAE* BRIEF IN SUPPORT OF DEFENDANTS CITY OF PLEASANTON ET AL.; AND PROPOSED BRIEF OF *AMICI CURIAE*

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CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

Amici Curiae LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES know of no interested entities or persons that must be listed under California Rules of Court, Rule 8.208(e)(1) & (2).

Dated: February 11, 2025 COLE HUBER, LLP

By: _____

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LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

State Cases

Alameda Produce Market, LLC,
52 Cal.4th 1100 (2011) 15
Alcala v. City of Corcoran,
147 Cal.App.4th 666 (2007) .....passim
Berman v. City of Daly City,
21 Cal.App.4th 276 (1993) 13, 14
Cal. Corr. Peace Officers Ass'n v. State Pers. Bd.,
10 Cal.4th 1133 (1995) 19, 20

Federal Statutes

Rules

Miscellaneous

*

APPLICATION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF IN SUPPORT OF RESPONDENTS

The League of California Cities ("Cal Cities") is an association of 476 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 25 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.

The California State Association of Counties ("CSAC") is a non-profit corporation. The membership consists of the 58 California counties. CSAC sponsors a Litigation Coordination Program, which is administered by the County Counsels' Association of California and is overseen by the Association's Litigation Overview Committee, comprised of county counsels throughout the state. The Litigation Overview Committee monitors litigation of concern to counties statewide and has determined that this case is a matter affecting all counties.

As its Legal Advocacy and Litigation Coordination Committees have determined, Cal Cities' and CSAC's members have a substantial interest in the outcome of this case. Most of Cal Cities' members and all CSAC's members have law enforcement agencies that safeguard their citizens. The cities and

counties are also all subject to Vehicle Code section 17001. That section makes localities liable for death or injury that their employees negligently cause while driving a car in the scope of their employment. But the Vehicle Code, through sections like sections 17004 and 17004.7, also immunizes police officers and localities for injuries and deaths resulting from operation of emergency vehicles like police cruisers. Under section 17004.7, localities that adopt and train their officers on vehicular pursuit policies are immune from liability for some injuries and deaths stemming from crashes caused by suspects who the police are pursuing or who believe they are being pursued.

Section 17004.7 is at the heart of this case. There are some 76,000 sworn police officers in California. Those officers collectively conduct thousands of investigations and vehicle pursuits every year under the aegis of the localities they serve. Section 17004.7 immunity is an important protection for cities and counties who would otherwise be hobbled by skyrocketing numbers of personal injury suits against the government.

In her Opening Brief, however, Appellant forwards a hyper-technical, unrealistic reading of section 17004.7. According to Appellant, section17004.7 never applies unless an officer is conducting a policy-defined high-speed chase with cruiser lights and sirens, regardless of whether a suspect believes she is being pursued by the police. That interpretation undermines section 17004.7's purpose and has serious ramifications for localities' and law enforcement's ability to safely investigate and thwart crime.

Appellant also contends that the immunity-triggering training required under section 17004.7 is insufficient unless every officer repeats, without exception, a minimum of one hour of training. But Appellant's reading is at odds with section 17004.7's plain, basic requirement that public agencies provided regular training on an annual basis, irrespective of a few individual officers' training times. Her interpretation imposes an unworkable standard and enormous administrative burdens on localities and police—particularly large departments of the most populous California cities and counties—of the kind the Supreme Court criticized in *Ramirez v. City of Gardena*, 5 Cal. 5th 995 (2018).

The Amici request permission to file this brief to identify what they believe to be the correct interpretation of section 17004.7, and to explain the long-term consequences that Appellant's position would engender. The authors of the brief are municipal attorneys specializing in defense and litigation on behalf of California's local governments. The authors regularly litigate on behalf of public entities subject to the Vehicle Code. Derek P. Cole has been a member of several City Attorneys Department committees and is a contract city attorney for three cities and has been a contract county counsel.

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BRIEF OF AMICI CURIAE

I. INTRODUCTION

It's night. A city police officer patrols a neighborhood known for car thefts. A red Mustang with dark tinted windows idles in a parking lot. As the Officer drives near, the Mustang rockets out of the lot and down the street. The Mustang, its plates partly hidden, matches the description of a car involved in a rash of burglaries. But it's dark and the plates are obscured so the Officer isn't sure. She decides to investigate and follows the car without activating her cruiser's lights. She radios in the partial plate. The Mustang speeds up and darts around corners as the Officer follows. The Officer hasn't received confirmation on the plates, so she doesn't activate her lights but continues to observe. The Officer and Mustang approach a busy intersection. The light turns red. The Mustang speeds through the light anyway, colliding with a van and killing its driver. When the family of the van's driver sues the city, the Mustang owner testifies he that sped away because he thought the Officer was following him and wanted to stop him.

Under a proper reading of Vehicle Code section 17004.7, the city is immune from damages. That section says that if local governments adopt policies about vehicular pursuit safety and train their police officers in those policies, they are immune from liability for some pursuit-related injuries and deaths. If police are pursuing someone who they suspect of violating the law, or if the

suspect *believes* the police are pursuing them, and the suspect crashes and injures someone, the locality isn't liable.

But under the reading of section 17004.7 that Appellant asks the Court to adopt, despite the driver's subjective belief that the Officer was following him, Vehicle Code section 17004.7 isn't satisfied because her lights weren't activated in an emergency chase. According to Appellant, no matter what a suspect subjectively believed—or even how objectively reasonable that belief is—a "pursuit" can never occur without sirens, lights, and a high-speed chase.

Here, the trial court disagreed. Appellant was critically injured when Elijah Henry fled from a parking lot to escape City of Pleasanton police officer Matthew Harvey. Harvey drove after Henry, who sped through a red light and crashed into Appellant. Despite Henry's testimony that he wanted to "get away" from Harvey, Appellant claims the City is liable because Officer Harvey didn't activate his lights and sirens in a hot pursuit. The judge ruled that the City was immune under section 17004.7.

Appellant also suggests that the City didn't annually or adequately train its officers for the purposes of receiving section 17004.7 immunity because some officers completed pursuit training in less than one hour. The trial court disagreed with that argument too.

The Amici submit this brief to highlight Appellant's faulty reasoning and the drastic consequences it has for California's municipalities. The sheer number of potentially liable entities

should resonate with the Court when it considers this case. California has 483 cities and 58 counties that collectively employ more than 76,000 police officers.[1] Appellant's demand for manufactured interpretations of section 17004.7 stripping public entities of immunity would spur torrential litigation over training schedules and police pursuits every time suspects crash. The Amici thus respectfully submit this Brief to request that the Judgment below be affirmed.

II. ARGUMENT

A. Section 17004.7 is Not Limited To Policy-Defined Pursuits Involving Lights, Sirens, and High-Speed Chases.

Operating 365 days a year, 24 hours a day, police officers in California conduct thousands of vehicle pursuits of suspected lawbreakers.[2] No one in this case disputes the dangers pursuits can entail. Nor does anyone really dispute the many lawsuits that police action can instigate. Recognizing both the ballooning number of lawsuits against public agencies and the dangers of vehicle pursuits, the Legislature endeavored to balance public safety and the need to apprehend fleeing suspects. (*Alcala v. City*

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[1] Gov. Code, §§ 23101-23158; Brandon Martin, et al., *Law Enforcement Staffing California*, Pub. Policy Inst. of Cal., https://www.ppic.org/publication/law-enforcement-staffing-in-california/ (as of Feb. 3, 2025).

[2] *See, e.g.*, Phillip Reese, *Searchable database: See how often California law enforcement agencies pursue suspects*, Sacramento Bee (Oct. 27, 2022), https://www.sacbee.com/news/investigations/article267922487.html

of Corcoran, 147 Cal.App.4th 666, 672 (2007); Sen. Com. on Judiciary, Analysis of Sen. Bill No. 719 (2005–2006 Reg. Sess.) May 10, 2005, pp. 5–8; Sen. Com. on Public Safety, Analysis of Sen. Bill No. 719 (2005–2006 Reg. Sess.) April 26, 2005, pp. I–K.) The fruit of the Legislature's labor was Vehicle Code § 17004.7.

Section 17004.7 encourages public entities to adopt and train their police officers on clear vehicular pursuit policies to ebb the rate of pursuit-related accidents and injuries. (*E.g.*, *Alcala*, 147 Cal.App.4th at 672–73; *Berman v. City of Daly City*, 21 Cal.App.4th 276, 280–81 (1993); Sen. Com. on Judiciary, Analysis of Sen. Bill No. 719, *supra*, pp. 5–10.) That is, the statute urges entities to adopt policies "for the safe conduct of motor vehicle pursuits," and train officers in those policies on a regular, "annual basis." (Veh. Code § 17004.7(b)(1), (c).) In return, section 17004.7 rewards those entities with immunity from suit for harm flowing from car crashes caused by suspects pursued by police, or who believe the police are pursuing them. (*Id.*; *Alcala*, 147 Cal.App.4th at 672.)

In staking out that equilibrium, the Legislature sought to protect the public by inspiring increased training of officers while providing "immunity in order to avoid deterring police officers from initiating high-speed vehicle pursuits when there was a need to do so." (*See, e.g.*, *Alcala*, 147 Cal.App.4th at 672.) Put another way, the Legislature adopted section 17004.7 to nudge public entities to adopt guidelines to reduce the frequency of accidents "while leaving to [the] agencies the fundamental law

enforcement decisions about when to undertake a pursuit, free from threats of liability." (*Colvin v. City of Gardena*, 11 Cal.App.4th 1270, 1278 (1992).) Indeed, the Legislature rejected multiple iterations of section 17004.7 that would have restricted immunity to police "pursuits" strictly delimited by entities' adopted policies. (*See* Sen. Com. on Judiciary, Analysis of Sen. Bill No. 719, *supra*, pp. 7–8.) Section 17004.7 "is intended to *increase* the immunity afforded [to] public entities [against] suspect-caused accidents and resulting lawsuits" when they adopt safety policies. (*Alcala*, 147 Cal.App.4th at 672 (emphasis added); *Berman*, 21 Cal.App.4th at 280–81; *Hooper v. City of Chula Vista*, 212 Cal.App.3d 442, 456 (1989).)

Amici do not submit this brief to rehash that Legislative history and statutory scheme, which the City's counsel has ably explained. From Amicis' perspective, though, it is important that the Court understand section 17004.7's provenance and why Appellant's reading is so egregious. Flouting its history, Appellant says that section 17004.7 immunizes public entities *only* if an officer initiates a pursuit defined by agency policy, with lights and sirens activated, when a suspect is "attempting to avoid arrest." (Appellant's Opening Brief ["AOB"] at 8–9, 39.) Section 17004.7 no doubt includes those objective circumstances. (Veh. Code § 17004.7(b)(1), (c)(1).) To fall under its protection, entities must adopt pursuit-safety policies defining a pursuit and train their officers on those policies. (*Id.*) If an officer trained in pursuit policies engages a "pursuit" as defined by policy and the

suspect crashes, the entity isn't liable. (*Id.*) But section 17004.7 doesn't end there. Under the plainest of readings, it includes subjective circumstances too. (*Los Angeles County Metro. Trans. Auth. v. Alameda Produce Market, LLC*, 52 Cal.4th 1100, 1106–1107 (2011) ("The well-established rules for performing this task require us [courts] begin by examining the statutory language, giving it a plain and commonsense meaning.") A public entity is immune from liability for injuries stemming from a suspect-caused crash when a suspect "*believes* he or she is being or has been[] pursued[.]" (*Id.* § 17004.7(b)(1) (emphasis added).)

Appellant doesn't like the commonsense meaning of section 17004.7 since it ends her case—Henry believed Officer Harvey was pursuing him irrespective of the absent lights and siren. (Respondent's Opening Brief [ROB] at 11, 38.) That's why Appellant manufactures her own meaning by chiseling the "believes" prong out of the statute. In doing so, she thwarts not just statutory language but an entire grant of immunity the Legislature bestowed on California's public entities. If a "pursuit" can only ever be a policy-defined pursuit with lights, sirens, and a high-stakes car chase, what does it matter whether a suspect believed the police were pursuing them? The belief clause becomes impermissibly superfluous.[3]

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[3] Even if Appellant's interpretation of section 17004.7 didn't render the belief clause null, it certainly renders it absurd. (*See, e.g.*, *Poole v. Orange Cty. Fire. Auth*, 61 Cal.4th 1378, 1385 (2015) (statutory interpretation must "avoid a construction that would lead to unreasonable, impractical, or arbitrary results."); *John v.*

That interpretation has real consequences for California's local governments. First, in an era of proliferating litigation against police and local governments at taxpayer expense, it subjects them to ever greater liability. There are thousands of police pursuits in California every year. There were about 11,985 pursuits in 2022 alone.[4] For every one of them, Appellant's nullification of an entire clause of immunity invites litigation on whether they met her vanishingly slim definition of "pursuit." This mocks the Legislature's intent. The Legislature aimed to *restrict* prolonged and costly litigation against localities that satisfied § 17004.7's policy requirements. (*See Alcala*, 147 Cal.App.4th at 672; Sen. Com. on Judiciary, Analysis of Sen. Bill No. 719, *supra*, pp. 5–8; Sen. Com. on Public Safety, Analysis of Sen. Bill No. 719, *supra*, pp. I–K.) It rejected amendments to section 17004.7 that would induce "protracted litigation regarding every pursuit that results in injury to a third party." (*See* Sen. Com. on Judiciary, Analysis of Sen. Bill No. 719, *supra*, pp. 7–8.)

Superior Court, 63 Cal.4th 91, 96 (2016); *In re D.B.*, 58 Cal.4th 941, 946–48 (2014).) It turns drivers into policy wonks who must be intimately familiar with any given police department's vehicular pursuit policies to know whether they are being "pursued." (*See* AOB at 38–44.) Nothing in the statute suggests that unreasonable result was the Legislature's intent.

[4] *Report to the Legislature, Senate Bill 719, Police Pursuits*, at 2, California Highway Patrol (June 2023), <https://www.chp.ca.gov/Documents/2023%20(CHP)%20Legislative%20Pursuit%20Report.pdf>.

That isn't surprising. California's mix of impositions of government liability on the one hand and restrictions on it on the other, such as the Government Tort Claims Act, reflect the Legislature's judgment about the proper balance between compensating loss and curtailing lawsuits' drain on public coffers. (*See, e.g.*, *L.A. Unified Sch. Dist. v. Superior Court*, 14 Cal.5th 758, 769–70 (2023).) Clearly delineated immunity and related claims statutes enable local governments to fiscally plan for (and avoid) potential liabilities. (*See, e.g.*, *id.*; *DiCampli-Mintz v. County of Santa Clara*, 55 Cal.4th 983, 990–91 (2012).) Indeed, the purpose of immunity statutes is "not to expand the rights of plaintiffs against governmental entities," but to explicitly define when the government is immune. (*See, e.g.*, *DiCampli-Mintz*, 55 Cal.4th at 983; *Varshock v. Dep't of Forestry & Fire Prot.*, 194 Cal.App.4th 635, 645–46 (2011).) Reading the belief clause out of section 17004.7 upsets that equipoise and throws open the gates to all manner of claims the Legislature barred.

Second, Appellant's interpretation incentivizes the behavior the Legislature sought to discourage. The Legislature strove to shield the public while mitigating officers' and localities' fear of liability so that they need not choose between risking a lawsuit and letting a suspect flee. (*See, e.g.*, *Alcala*, 147 Cal.App.4th at 672–73; *Hooper*, 212 Cal.App.3d at 456; Sen. Com. on Judiciary, Analysis of Sen. Bill No. 719, *supra*, pp. 5–10; Sen. Com. on Public Safety, Analysis of Sen. Bill No. 719, *supra*, pp. I–K.) But Appellant would eliminate immunity for any pursuit that might

call for *less* than a high-speed chase; for example, pursuing a suspect for investigatory reasons or during the rush-hour traffic that Appellant says renders pursuits dangerous. (AOB at 16–17, 32, 40.) Officers and localities would be left with only two options: initiate a high-speed chase with lights and sirens blaring—because a "pursuit" without lights and sirens incurs liability whenever a suspect crashes—or let the suspect go. (*See Alcala*, 147 Cal.App.4th at 672; *Hooper*, 212 Cal.App.3d at 456; AOB at 38–44.) The Legislature did not contemplate such a transparently contrived catch-22.

B. Substantial Completion of Pursuit-Safety Training in a Calendar Year Satisfies § 17004.7.

Everyone agrees that localities must adopt and annually train their officers in safe vehicle pursuit policies under section 17004.7. (*E.g.*, Veh. Code § 17004.7; Pen. Code § 13519.8; Cal. Code Regs., tit. 11, §§ 1005, 1081.) But according to Appellant, those training regimes must all but go off without a hitch. At trial, the essence of her argument was that the City's training was deficient because some officers hadn't repeated a one-hour training within 365 days of an earlier one, and some training took less than a mandatory hour. (ROB at 18, 22, 47–48.) She raises a similar challenge here, contending that evidence must undisputedly prove officers never completed any less than one hour of training annually. (*See* AOB at 12–13, 48–50.)

The City has adeptly illustrated the evidentiary and logical flaws in Appellant's argument. (ROB at 44–50.) Burrowed within

Appellant's prefab construction of section 17004.7, though, is the notion that essentially *any* deviation from a one-hour minimum training divests municipalities of any immunity. (*See* AOB at 12–13, 48–50.) Amici write to capture the absurd administrative consequences that her interpretation would create.

When interpreting statutes, the plainest meaning controls. (*E.g.*, *Kim v. Reins Int'l Cal, Inc.*, 9 Cal.5th 73, 83 (2020); *Ramirez v. City of Gardena*, 5 Cal. 5th 995, 1000–01 (2018).) Courts construe words in context and harmonize them to avoid unreasonable, absurd outcomes the Legislature did not intend. (*See John*, 63 Cal.4th at 95–96; *Poole*, 61 Cal.4th at 1385.) In doing so, courts can consider the consequences of a particular reading and "will not readily imply an unreasonable legislative purpose." (*Cal. Corr. Peace Officers Ass'n v. State Pers. Bd.*, 10 Cal.4th 1133, 1147 (1995).)

Appellant ignores those rules. Superimposing superhuman precision onto municipalities, she effectively contends that they must foresee every deviation from a one-hour minimum by any officer in their employ. (*See* AOB at 12–13, 48–50.) The City of Pleasanton, like many localities, uses pursuit training issued by the Commission on Peace Officer Standards and Training (POST). (*See* ROB at 12–15.) POST, established under California law, is a state agency responsible for regulating training and certification of the qualifications of law enforcement officers. (*E.g.*, Pen. Code § 13510.) Alongside its own trainings, the City, like many others, uses a POST-issued a self-paced, roughly one-

hour online training course for vehicle pursuits. (ROB at 14–15.) In Appellant's view, any deviation from that hour destroys municipalities' immunity. But that isn't what section 17004.7 requires. (*See* Veh. Code § 17004.7(b)(1).) The plainest meaning of section 17004.7 is exactly what it says: a public agency receives immunity if it "provides regular and periodic training on an annual basis" for vehicle pursuits. (*Id.*) How could it mean otherwise? Section 17004.7 requires adoption of policies and periodic annual training on those policies. Even if below POST's one-hour framework, section 17004.7 says nothing about commandeering localities' immunity if a handful of officers complete 59 minutes of training instead of an hour. (*See id.*; *cf. Ramirez*, 5 Cal.5th at 1000–02.)

What is more, mandating that public entities individually monitor police officers, who are hired and trained at different times, for completion of exactly an hour minimum of training imposes enormous administrative burdens and costs on public entities. (*See Ramirez*, 5 Cal.5th at 1001.) It would be difficult for cities of a few dozen officers to track that data and organize a pursuit training on an individual basis whenever an officer completed a self-paced training a few minutes shy of an hour. (*See id.*) It would probably be *impossible*—to say nothing of expensive—for entities employing thousands of officers. The Los Angeles Police Department, for example, employs more than

13,000 sworn officers.[5] Los Angeles would be absurdly deprived of its statutory immunity if even *one* of its officers did not repeat an hour of training. The duty (to say nothing of the ability) to micromanage *every* officer whom POST has entrusted with a self-paced training is so unreasonable a burden that the Legislature could not have intended it.[6] (*See Ramirez*, 5 Cal.5th at 1000–02; *In re D.B.*, 58 Cal.4th at 948.)

Our Supreme Court, in *Ramirez v. City of Gardena*, criticized Appellant's kind of unreasonable construction of § 17004.7. (*Id.* at 1000–02.) There, the Court held that public entities need not strictly comply with § 17004.7's requirement that officers sign a certification that they have received pursuit policies. (*Id.*) The Court wrote that, alongside the statute's express language rejecting 100% compliance, public policy

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[5] *Criminal Justice Personnel*, California Department of Justice, <https://openjustice.doj.ca.gov/ exploration/crime-statistics/criminal-justice-personnel (as of February 6, 2025.)

[6] To the extent Appellant raises it here (*see* AOB at 12–13, 48–50) Appellant's argument below that section 17004.7's requirement of "annual" training means municipalities must helicopter around officers to ensure they complete exactly an hour of training within exactly 365 of days of a prior training or 365 days before a crash is also unreasonable. It imposes insurmountable administrative burdens on municipalities and strips them immunity because they aren't clairvoyant and cannot foresee every crash. (*See Ramirez*, 5 Cal.5th at 1000–02.) The plain reading of "annual" is one calendar year, not 365 days following training or preceding a pursuit-related crash. (Veh. Code § 17004.7(b)(1).) It is entirely possible that our Mustang-chasing officer could have completed pursuit training in February 2024, pursued the Mustang in June 2025, and satisfied her yearly training in August 2025.

considerations led to the same conclusion. (*Id.*) Mandating 100% compliance as a prerequisite to immunity would impose massive burdens on agencies, especially large ones, who could diligently implement a pursuit policy but be stripped of immunity if a "single negligent or recalcitrant officer happens to be" noncompliant at the time of a crash. (*Id.* at 1001.) That, the Court said, would reduce the incentive to adopt section 17004.7 policies, which the Legislature did not intend. (*Id.*)

The same reasoning applies here. Localities like the City of Pleasanton could do everything in their ability to comply with Appellant's one-hour minimum standard. (*See id.* at 1000–02) But a single errant miscalculation, computer glitch, or officer absence on the day of a training would deny localities the immunity the Legislature saw fit to bequeath, besieging them with one suit after another. (*See id.*) That burden vitiates any incentive to adopt section 17004.7 policies when the cost of compliance is so high and the benefit so little. (*See id.*) It also destroys the safety reasons behind section 17004.7's adoption in the first place. Surely, the Legislature did not intend such an arbitrary, absurd result.

III. CONCLUSION

For the reasons above, Cal Cities and CSAC urge the Court to affirm the judgment of the trial court below.

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Dated: February 11, 2025 COLE HUBER, LLP

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CERTIFICATE OF COMPLIANCE

[Cal. Rules of Court, rule 8.204(c)(1)]

Pursuant to the California Rules of Court, Rule 8.204(c)(1), I certify that the attached brief is proportionally spaced; has a typeface of 13-point, Century Schoolbook font; and, according to the word count by Microsoft Word, contains 3,858 words, which is within the 14-000-word limitation for briefs.

Dated: February 11, 2025 COLE HUBER LLP

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Melanie Gilliland v. City of Pleasanton
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At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Placer, State of California. My business address is 2281 Lava Ridge Court, Suite 300, Roseville, CA 95661.

On February 12, 2025, I served true copies of the following document(s) described as:

APPLICATION OF LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES TO FILE *AMICI CURIAE* BRIEF IN SUPPORT OF DEFENDANTS CITY OF PLEASANTON ET AL.; AND PROPOSED BRIEF OF *AMICI CURIAE*

on the interested parties in this action as follows:

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

Executed on February 12, 2025, at Roseville, California.

/s/ Tracy Rainsbury
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California Court of Appeal / First District – Division One
Case No. A170666

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