



August 26, 2025

Court of Appeal
Fifth Appellate District
2424 Cesar Chavez Blvd.
Fresno, CA 93721

Re: Informal Response | *City of Fresno v. The Superior Court of Fresno County*
Court of Appeal Case No. F089987
Fresno County Superior Court No. 24CECG01635

Dear Justices:

Real Party in Interest the American Civil Liberties Union of Southern California (“ACLU”), pursuant to this Court’s request of August 12, 2025, respectfully submits this informal response to the Petition for Writ of Mandate (“Petition”) filed by Petitioner City of Fresno (“Fresno”). This informal response also addresses the question posed by this Court: Did the trial court abuse its discretion in denying real party in interest’s request for attorneys’ fees under Government Code section 7923.115, subdivision (a)? “An award of costs and attorney fees pursuant to this provision is mandatory if the plaintiff prevails.” (*Di Lauro v. City of Burbank* (2025) 110 Cal.App.5th 969, 981, citing *Filarsky v. Super. Ct.* (2002) 28 Cal.4th 419, 427.)

I. INTRODUCTION

This case arises from Fresno’s unlawful refusal to produce non-privileged public records concerning the Fresno Police Department’s use of police canines—records that are public and subject to disclosure under the California Public Records Act (“PRA”). The ACLU submitted its request in response to mounting community concern over the Fresno Police Department’s egregious and racially disproportionate use of police canines. In responding to the request, Fresno improperly withheld entire categories of responsive public records, applied blanket redactions to hide disclosable information in canine use of force and accidental bite reports, and failed to produce any such reports from 2021. Fresno’s failure to produce these public records violates the PRA and the California Constitution. Because the ACLU is entitled to all requested records and, as the prevailing party, to attorneys’ fees, this Court should deny Fresno’s Petition.

Fresno attempts to frame this case as a dispute over the definition of “great bodily injury” (“GBI”) under Penal Code section 832.7.¹ But the term is clearly defined by statute and further clarified by caselaw. Rather than accept this legal framework, Fresno seeks to rewrite the legislative history to justify its refusal to produce public records of paramount public concern.

¹ Unless otherwise noted, all further statutory references are to the Penal Code.

The use of police canines is a matter of urgent public interest, particularly given the grave physical harm these dogs have inflicted on civilians—including unarmed individuals and innocent bystanders. The deployment of attack dogs by law enforcement is deeply rooted in a legacy of racialized violence, a legacy that continues to manifest today in unjustified and excessive uses of force against communities of color.² Fresno is not immune from this pattern. Its own canine unit has been implicated in a series of disturbing incidents that underscore the critical need for transparency, including an incident involving a child attending a police demonstration.³ The public has a right to know when, how, and under what circumstances law enforcement officers are using police dogs, especially when those deployments result in individuals sustaining GBI.

To vindicate its statutory and constitutional right to these records, the ACLU filed a Verified Petition for Writ of Mandate and Complaint for Injunctive and Declaratory Relief in Fresno Superior Court. [1 App., Exh. 1, pp. 16–28.] In granting the ACLU’s motion for judgement, the trial court found that Fresno had a duty to produce responsive records. [6 App., Exh. 18, (Superior Court Statement of Decision) p. 1624.] The trial court rejected Fresno’s attempt to redefine the statutory term “great bodily injury,” finding that “Fresno’s dissatisfaction with the term ‘great bodily injury’ in Penal Code section 832.7(b)(1)(A)(ii), which the Legislature specifically chose in the final adoption of SB 1421 over the term ‘serious bodily injury,’ is for the Legislature. Fresno is not free to interpret the statute as they choose and ignore the plain language of the statute and the clear expression of legislative intent apparent from a review of the legislative history.” [*Id.* at pp. 1623–24.] Despite granting the ACLU’s requested relief and awarding costs, the trial court erroneously denied ACLU’s request for attorneys’ fees under Government Code § 7923.115, subd. (a). [*Id.* at p. 1625.]

Writ review is reserved for exceptional circumstances, and none is present here. This Court should deny Fresno’s Petition.

II. BACKGROUND

The ACLU does not dispute the procedural history in Fresno’s Petition. [*See* Petition at ¶¶ 1–28.] Here, the ACLU highlights additional facts pertinent to the superior court’s decision.

Generally, when police officers use force, they are required to document the incident, including by providing a written description and the type of force used. This reporting requirement applies for every use of force—regardless of whether the incident is connected to a criminal investigation—and serves critical functions: promoting accountability and informing the need for changes in training, policies, procedures, equipment, or other areas. The Fresno Police Department Policy Manual applies these general rules to its officers who must report any use of

² *See* ACLU California Action, *Weaponizing Dogs: The Brutal and Outdated Practice of Police Attack Dogs* (January 2024) pp. 12–15 <https://aclucalifornia.org/wp-content/uploads/2024/01/ACLUReport_Weaponizing-Dogs_1.10.2024.pdf> (as of February 22, 2024) (hereafter *Weaponizing Dogs*).

³ ABC30, *Fresno Police K-9 Attacks Innocent Bystander* (May 21, 2015) <<https://abc30.com/hanley-sell-jerry-dyer-k-9-attack/733733/>> (as of February 24, 2022); *Weaponizing Dogs*, *supra*, at p. 19; ABC30, *Fresno Police K9 Fatally Shot After Biting Officer* (January 5, 2022) <<https://abc30.com/fresno-police-k9-killed-officer-shot-odin-department/11425605/>> (as of February 24, 2022).

force that results in injury, regardless of whether it is part of a criminal investigation.⁴ The Policy Manual specifically addresses canine use of force—both when directed by a police officer and accidental—requiring that injuries caused by a police canine be “documented in a canine use report,” and that “[u]ntended bites or injuries caused by a canine should be documented in an *administrative* report, not in a canine use report.”⁵ The Policy Manual does not refer to use of force or accidental bite reports as “investigatory,” limit reporting requirements to force related to criminal investigations, require such reports be part of investigatory files, or state that their purpose is to assist with investigations. Rather, it specifies that the purpose of documentation is “to determine effectiveness of force, reliability of equipment, training needs, policy modifications, etc.,” and that accidental bite reports are administrative reports.⁶

Against this backdrop, the ACLU submitted a PRA request to Fresno seeking public records to understand the scope and impact of its police canine force.

A. Decision by Trial Court

After considering the parties’ arguments and all briefing, the superior court issued a Judgement Granting Peremptory Writ of Mandate and Statement of Decision directing Fresno to produce all records responsive to the ACLU’s PRA request.⁷ The court identified the central dispute as “parties’ disagreement [] on whether the requested records are investigatory reports exempt from disclosure by Government Code Section 7923.600” and, if so, whether they “are nevertheless required to be produced pursuant to Penal Code Section 832.7, subdivision (b)[.]” [6 App., Exh. 18, p. 1618]. The superior court found that Fresno “has a duty to produce every responsive record that evidences a canine deployment that caused great bodily injury, as defined in Penal Code Section 12022.7(f) and reported court cases interpreting the term, as well as records reflecting a sustained finding involving a complaint that alleges unreasonable or excessive force by means of a canine deployment (Pen. Code, § 832.7(b)(1)(A)(iii).)” [*Id.* at 1624.] The superior court reasoned that, regarding the term “great bodily injury” in section 832.7, subd. (b)(1)(A)(ii), Fresno is bound by the statute’s plain language and legislative history and “is not free to interpret the statute as they choose[.]” [*Id.* at pp. 1623–24.]

⁴ 6 App., Exh. 15(M), (Policy 300 Use of Force) pp. 1506–07 (force includes any time a person is injured by an officer or canine); *id.* at p. 1507 (use of force must be documented “promptly, completely, and accurately in an appropriate report”).

⁵ 6 App., Exh. 15(N), (Policy 318, Canine Program) p. 1513 (Policy 318.8 on “Reporting Deployments, Bites, and Injuries”) (italics added).

⁶ *See* 6 App., Exh. 15(M), p. 1508; *see also* 6 App., Exh. 15(N), p. 1513.

⁷ The parties disagree about “whether the requested records are investigatory reports” [6 App., Exh. 18, p. 1618] and previously briefed the issue of whether Fresno was required to conduct a particularized inquiry into the records [*see, e.g.* 5 App., Exh. 14, (ACLU Supplemental Brief) pp. 1395–96], but the court did not reach either issue and instead focused solely on whether Fresno’s withheld records must be produced pursuant to section 832.7, subd. (b) as records describing GBI. [*See* 6 App., Exh 18.] This informal briefing focuses on the issues of GBI and attorneys’ fees, but ACLU reserves the right to present argument in further formal briefing about whether the requested records are investigatory and whether Fresno has conducted an adequately particularized review.

III. Legal Argument

A. Fresno Cannot Demonstrate Grounds for Extraordinary Writ Relief Because the Superior Court Properly Ordered the Release of Public Records

Fresno cannot demonstrate that this case warrants the extraordinary remedy of writ review. As a prerequisite for writ relief, a petitioner must demonstrate irreparable harm if the writ is not granted. (*People v. Super. Ct. of City & County of San Francisco* (2024) 100 Cal.App.5th 315, 324.) Fresno cannot meet its burden because the ACLU is entitled to the requested records. Records evidencing canine deployments are public records, and disclosure of such non-privileged records is required by statute and well-settled case law. (*See Becerra v. Super. Ct.* (2020) 44 Cal.App.5th 897, 921 [The legislative aims of SB 1421 “are best advanced by a construction that authorizes disclosure of all responsive officer-related records in the possession of a state agency, regardless whether they pertain to officers employed by the agency and no matter which agency created them.”].) Fresno suffers no cognizable harm by complying with the superior court’s order to produce records that the law already obligates it to disclose. At most, the court compels Fresno to do what every public agency must do: produce responsive public records. Because Fresno cannot demonstrate irreparable harm from performing a legal duty, this Court should deny its Petition.

Fresno also claims that writ review is necessary because there is supposed conflict amongst trial courts as to what constitutes GBI. [Petition at p. 57.] But no such conflict exists. Fresno cites a Fresno County Superior Court decision in *Howey v. City of Fresno, et al.* (No.23CECG01468) to suggest that the court has adopted conflicting definitions of GBI. But *Howey* simply reflects that two departments in the same superior court can reach different outcomes in different factual circumstances. That is not a conflict in law. (*See Childers v. Childers* (1946) 74 Cal.App.2d 56, 61 [“It is a fundamental rule of [stare decisis] that a decision is not authority for what is *said* in the opinion but only for the points *actually involved* and *actually decided*”].) Fresno’s attempt to manufacture a split in authority cannot justify the extraordinary remedy of writ review.⁸

B. The Superior Court Correctly Applied the Plain Text Reading of Section 832.7 and Ordered Disclosure of Records

The superior court correctly decided that section 832.7 means what it says: the governing standard is “great bodily injury,” not “serious bodily injury.” In interpreting a statute, a court must “determine the Legislature’s intent so as to effectuate the law’s purpose,” based first and foremost on “the statutory language,” and must “follow the Legislature’s intent, as exhibited by the plain meaning of the actual words of the law.” (*Becerra, supra*, 44 Cal.App.5th at 917.) Here, the statutory text is unambiguous. As the Supreme Court has explained, when the meaning of a statute is clear “in light of standard principles of interpretation, . . . there is no need to resort to legislative history.” (*In re Greg F.* (2012) 55 Cal.4th 393, 408; *see also Hamilton & High, LLC*

⁸ Additionally, this superior court’s ruling raises no novel issue of Constitutional law or issue of widespread public interest that would warrant writ review. (*See Omaha Indemnity Co. v. Super. Ct.* (1989) 209 Cal.App.3d. 1266, 1273.) Rather, the ruling simply applies settled law governing disclosure obligations under the PRA. (*Powers v. City of Richmond* (1995) 10 Cal.4th 85, 115 [finding that PRA writ review may be declined summarily where its issues do not meet the extraordinary-writ thresholds].)

v. City of Palo Alto (2023) 89 Cal.App.5th 528, 549 [where statute is clear, it is “unnecessary to resort to extrinsic interpretive aids such as the legislative history”].) The superior court correctly rejected Fresno’s attempt to rewrite the statute by substituting “serious bodily injury” for the Legislature’s choice of “great bodily injury.” This Court should do the same and deny Fresno’s Petition.

1. Case Law and Legislative History Confirm That GBI is Well-Defined and has a Settled Meaning

Even if the Court were to consider Fresno’s arguments, the legislative history confirms that the Legislature rejected the term “serious bodily injury” in favor of “great bodily injury,” with the intent to incorporate the well-developed case law interpreting that term. By adopting the GBI standard, the Legislature struck a deliberate balance—mandating disclosure of records concerning force that caused significant or substantial injury, while excluding incidents involving only minor or trivial harm.

The legislative history reinforces this plain meaning. On August 23, 2018, shortly before Sen. Bill No. 1421 (“SB 1421”) was approved and sent to the Governor, it was amended to substitute “great bodily injury” for “serious bodily injury.” [1 App., Exh. 7(F) (Amendment to SB 1421), pp. 261–63.] By deleting “serious bodily injury” in favor of “great bodily injury,” the Legislature demonstrated its intent to make GBI the relevant standard for disclosure of records about use of force. That conclusion is reinforced by the Senate Floor Analysis of August 31, 2018, which stated that the foregoing amendment was intended to “clarify the level of injury that requires *release of records* is ‘great bodily injury’ due to the larger body of law interpreting that term.”⁹ The legislative history thus confirms the “plain-meaning construction” of GBI as used in SB 1421. (*Hughes v. Pair* (2009) 46 Cal.4th 1035, 1046.) Any “arguments as to what [Fresno] believes the Legislature should have enacted” cannot “change the plain language of the statute the Legislature did enact, or rewrite the legislative history evincing what the Legislature intended.” (*State of California ex rel. Hindin v. Hewlett-Packard Co.* (2007) 153 Cal.App.4th 307, 320.)

Relying on its flawed interpretation of section 832.7, Fresno categorically redacted all canine use of force and accidental bite reports, claiming that police canines are incapable of causing GBI under its improperly narrowed definition. That position fails because GBI means exactly what the statute says—not “serious bodily injury” —and police canines can, and often do, cause GBI.

The superior court properly rejected Fresno’s contrary interpretation of “great bodily injury,” and this Court should do the same.

⁹ California Legislative Information, Bill Analysis for SB-1421 (2017-2018) <https://leginfo.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201720180SB1421> (as of Aug. 25, 2025) (emphasis added).

2. SB 1421 Clearly and Unambiguously Uses the Term GBI, which is a Well-Defined Term of Art

In rejecting Fresno’s definition of GBI, the superior court recognized that “[i]n any case involving statutory interpretation, the Court’s fundamental task is to determine the Legislature’s intent in order to effectuate the law’s purpose.” [6 App., Exh. 18, p. 1620.] The court went on to say that “[t]he text of the statute is the best indicator of legislative intent, but the court may reject a literal construction that is contrary to the legislative intent apparent in the statute or that would lead to absurd results.” [*Id.*]

Here, the text of SB 1421 is clear. It amended section 832.7 to require disclosure of police records involving use of force resulting in “great bodily injury.” The California Supreme Court settled that GBI and SBI have “separate and distinct statutory definitions,” and thus are neither “equivalent as a matter of law” nor “interchangeable.” (*In re Cabrera* (2023) 14 Cal.5th 476, 484–85 [citations omitted].) GBI means any “significant or substantial physical injury,” (*id.* at 488 [quoting Pen. Code § 12022.7, subd. (f)]),¹⁰ while, SBI involves a “serious impairment of physical condition . . .” (*Id.* at 484 [quoting Pen. Code § 243, subd. (f)(4)].) The Court therefore has no need to resort to legislative analysis: GBI means GBI.

Recognizing the clear text of SB 1421 and the distinction between two terms of art, courts have held that GBI is distinct from SBI in the context of the PRA. Two superior courts—in addition to the superior court on appeal—rejected the exact attempt to interchange definitions that Fresno made below and repeats on appeal.¹¹ The Contra Costa Superior Court found “there simply is no ambiguity at all” that “[t]he Legislature’s choice of the phrase ‘great bodily injury’ [in SB 1421] signals its intent that this term of art be applied, and not the narrower (and equally well-established) term of art ‘serious bodily injury.’” (*Richmond Police Officers’ Assn. v. City of Richmond* (Super. Ct. Contra Costa County, 2020, No. MSN19-0169 at 26.)) The Sacramento County Superior Court similarly found “the plain language of [SB 1421], its legislative history, and the text and purpose of the PRA, all show that the Legislature intended agencies to apply a broader definition of ‘great bodily injury’ [rather] than the overly-restrictive term ‘serious bodily injury’ when responding to . . . PRA requests.” (*The Sacramento Bee v. Sacramento County Sheriff’s Dept.* (Super. Ct. Sacramento County, 2019, No. 34-2019-80003062 at 7.)) In short, there is simply no ambiguity. GBI in section 832.7 means GBI, not SBI.

In determining what injuries qualify as GBI, California courts interpret the term broadly,¹² consistent with the PRA’s presumption in favor of disclosure. Courts also interpret the term broadly in criminal cases. GBI does not require “permanent,” “prolonged,” or “protracted” disfigurement, impairment, or loss of bodily function, let alone any life-threatening injuries. (*People v. Escobar* (1992) 3 Cal.4th 740, 750.) GBIs include lacerations, bruises, abrasions, deep punctures, muscle and bone damage, disfigurement, and permanent nerve damage.¹³

¹⁰ See also Judicial Council of California Criminal Jury Instructions (2025) <https://courts.ca.gov/system/files/file/calcrim_2025_edition.pdf>(as of Aug. 25, 2025).

¹¹ While these decisions do not bind the Court, they reflect that multiple other superior courts have interpreted section 832.7 and SB 1421 to include a broad definition of GBI distinct from SBI.

¹² 5 App., Exh. 9, (Petitioner’s Reply Memorandum and Points of Authorities) pp. 1266–68.

¹³ 1 App., Exh. 3, (Notice of Motion and Motion for Judgment on Verified Petition) p. 58 fn.9.

3. No Absurd Results Flow from the Plain Reading of Section 832.7

A plain reading of “great bodily injury” in section 832.7 does not lead to any absurd results, and Fresno’s contrary argument fails under minimal scrutiny. Fresno conflates section 832.7 with the legal “threshold for when officers could use deadly force” (Petition at p. 43) under section 835a. But these are separate statutes and the definition of GBI has no bearing on when officers can use deadly force. The standard of GBI under section 832.7 governs the *disclosure of public records* and is distinct from the separate legal standard that governs peace officers’ *use of deadly force*.

Section 832.7 governs disclosure of police records, requiring public access to records of use of force incidents *resulting* in “great bodily injury.” By contrast, section 835a—enacted through Assembly Bill 392 in 2019—permits officers to use deadly force only when necessary “to defend against an imminent threat of death or serious bodily injury. (Pen. Code, § 835a, subd. (c).) The Legislature used different terms with different meanings for different circumstances—one for public transparency, and the other for use of force justification; these standards are not interchangeable. Records about use of force must be *disclosed* when the force results in “great” bodily injury. Officers shall only *use deadly force* to defend against imminent threat of “serious” bodily injury or death. Fresno’s attempt to collapse these definitions ignores the statutory text and structure. These terms are not equivalent, and decisions about one have nothing to do with the other.

As the trial court correctly recognized at hearing, deadly force and great or serious bodily injury are not equivalent issues. [6 App., Exh. 17, (Mar. 21, 2025 Transcript) p. 1592.] Great or serious bodily injuries are defined by injuries that *result* from use of force, while “deadly force” is determined by the *amount* and *type* of force applied. The definitions have no bearing on one another.

Fresno also claims that the trial court misinterpreted legislative intent. However, the trial court’s reading of section 832.7 was faithful to the Legislature’s intent to enhance transparency and build public trust. This intent is discussed in detail above and the California Constitution instructs that a statutory provision “shall be broadly construed if it furthers the people’s right of access, and narrowly construed if it limits the right of access.” [Cal. Const., art. 1, § 3, subd. (b)(2).] SB 1421 is a public transparency statute. To interpret GBI narrowly would rewrite the statute and violate the California Constitution by severely limiting access to public records.

IV. COSTS AND ATTORNEYS’ FEES

In its Verified Petition for Writ of Mandate, the ACLU sought an award of attorneys’ fees pursuant to Government section 7923.115, subd. (a). [1 App., Exh. 1, p. 26.] Without affording the ACLU an opportunity to submit a properly noticed motion following the grant of a peremptory writ of mandate, the superior court misapplied controlling statutory law requiring a mandatory fee award to the ACLU—a prevailing PRA requester, and *sua sponte* denied such relief, even while awarding costs, without notice or an opportunity to be heard. The superior court abused its discretion in denying the ACLU’s attorneys’ fees. This denial was erroneous and contrary to law.

A. Attorneys' Fees Are Mandated by Statute for the Prevailing Party in a PRA Action

Government Code section 7923.115, subd. (a) is unequivocally clear: “the court *shall* award court costs and reasonable attorney’s fees to the requester” who prevails in litigation filed pursuant to this division. (Gov. Code, § 7923.115, subd. (a), emphasis added.) The statutory language is mandatory. Once a requester prevails in a PRA litigation, the court must award reasonable attorneys’ fees and costs. (Gov. Code, § 7923.115, subd. (a); *Filarsky, supra*, 28 Cal.4th 419, 427, “[a]n award of costs and attorney fees pursuant to this provision is mandatory if the plaintiff prevails.”; *Di Lauro, supra*, 110 Cal.App.5th 969, 981 [same]; *Bernardi v. City Of Monterey*, (2008) 167 Cal.App.4th 1379, 1393 [same].) The superior court’s failure to do so here constitutes reversible legal error.

Here, the superior court recognized the ACLU’s prevailing party status by awarding costs in the case, but inexplicably declined to award fees. The Legislature’s intent in enacting the PRA’s mandatory fees provision was to encourage public oversight and transparency by removing financial barriers to judicial enforcement. As the Court of Appeal emphasized in *Braun v. City of Taft* (1984) 154 Cal.App.3d 332, 349, “[t]hrough the device of awarding fees, citizens can enforce [the PRA’s] salutary objectives.” That intent would be severely undermined if courts were permitted to deny attorneys’ fees arbitrarily, or without adherence to the statute’s requirements. (See *Los Angeles Times v. Alameda Corridor Transp. Auth.* (2001) 88 Cal.App.4th 1381, 1392 [explaining that the failure to award fees would have a chilling effect on future efforts by members of the public to obtain access under the PRA to small yet critical portions of documents illegally held by public entities].)

As discussed below, the ACLU is indisputably the prevailing party. The superior court granted ACLU’s Verified Petition for Writ of Mandate and compelled Fresno to disclose public records that had been improperly withheld or redacted. [6 App., Exh. 18, pp. 1617, 1624–25.] The relief ordered by the court was neither minimal nor insignificant; it involved the production of substantial, substantive public records previously denied to the public.

B. Real Party in Interest is a Prevailing Party

A requester prevails under the PRA when their litigation causes the agency to disclose records that were previously withheld or improperly redacted. (*Los Angeles Times, supra*, 88 Cal.App.4th at 1391.) That standard is well-established: a requester need not obtain all requested records, so long as the litigation “motivated [the agency] to provide the primary relief sought,” caused the agency to change its behavior, or “substantially contributed to or was demonstrably influential in setting in motion the process which eventually achieved the desired result.” (*Belth v. Garamendi* (1991) 232 Cal.App.3d 896, 901-902; *Bernardi, supra*, 167 Cal.App.4th 1379, 1393; *Pac. Merch. Shipping Ass’n v. Bd. Of Pilots Comm’rs*, (2015) 242 Cal.App.4th 1043, 1054; *Galbiso v. Orosi Pub. Util. Dist.*, (2008) 167 Cal.App.4th 1063, 1085.)

Here, the ACLU easily meets this standard. As a direct result of this litigation, the superior court granted a peremptory writ of mandate, compelling Fresno to disclose records that had been improperly redacted and withheld. [6 App., Exh. 18, p. 1624.] The superior court’s ruling clarified and enforced the scope of Fresno’s PRA obligations.

Accordingly, the ACLU is a prevailing party within the meaning of Government Code section 7923.115, subd. (a). The superior court thus abused its discretion by denying attorneys' fees to the ACLU, despite its prevailing party status and the PRA's mandatory fee provision.

V. CONCLUSION

For the reasons above, the Court should deny Fresno's Petition and find that the superior court erred when it denied ACLU's request for attorneys' fees.

Respectfully Submitted,

/s/ Nicolas Hidalgo

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PROOF OF SERVICE

I, Angelina Alas, declare that I am over the age of eighteen and not a party to the above action. My business address is 39 Drumm Street, San Francisco, CA 94111. My electronic service address is aalas@aclunc.org. On August 26, 2025, I served the attached,

1. INFORMAL RESPONSE BY REAL PARTY IN INTEREST, ACLU

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused to be transmitted to the following case participants a true electronic copy of the document via this Court's TrueFiling system:

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BY MAIL: I mailed a copy of the document identified above by depositing the sealed envelope with the U.S. Postal Service, with the postage fully prepaid.

Superior Court of California, County of Fresno
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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 August 26, 2025 in San Francisco, CA.

/s/ Angelina Alas

Angelina Alas
Declarant