No. A170704

In the Court of Appeal, State of California

FIRST APPELLATE DISTRICT, DIVISION FOUR

COALITION for PACIFICANS FOR AN UPDATED PLAN and KRISTIN CRAMER.
Plaintiffs and Respondents,

vs.

CITY COUNCIL OF THE CITY OF PACIFICA and CITY OF PACIFICA,
Defendants and Appellants,

MONTEREY ROAD PACIFICA, LLC, JAVIER CHAVERRIA, VISTAMAR DEVELOPMENT,
Real Parties in Interest and Appellants.

On Appeal From the Superior Court for the State of California, County of San Mateo, Case No. 20-CIV-05719, Hon. Nancy L. Fineman

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AMENDED BRIEF OF AMICI LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES IN SUPPORT OF APPELLANT CITY OF PACIFICA

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I. INTRODUCTION AND SUMMARY OF ARGUMENT

The fee award should be reversed and remanded with direction to deny Petitioners' motion for attorney's fees. The award does not properly apply Government Code section 65589.5, subdivision (p) ("Subdivision (p)") of the Housing Accountability Act (HAA), which states:

> (p) (1) Upon any motion for an award of attorney's fees pursuant to Section 1021.5 of the Code of Civil Procedure, in a case challenging a local agency's approval of a housing development project, a court, in weighing whether a significant benefit has been conferred on the general public or a large class of persons and whether the necessity of private enforcement makes the award appropriate, **shall give due weight to the degree to which the local agency's approval furthers policies of this section**, **including, but not limited to, subdivisions (a), (b), and (c), the suitability of the site for a housing development, and the reasonableness of the decision of the local agency**. It is the intent of the Legislature that attorney's fees and costs shall rarely, if ever, be awarded if a local agency, acting in good faith, approved a housing development project that satisfies conditions established in paragraph

(1), (2), or (3) of subdivision (a) of Section 65589.5.1 or paragraph (1), (2), or (3) of subdivision (a) of Section 65589.5.2. (Emphasis added.)

This requires courts to give "due weight" to the fact a housing approval furthers the pro-housing policies of the HAA — even when a plaintiff may otherwise qualify for fees under Code of Civil Procedure section 1021.5 based on other public interest statutes, such as the California Environmental Quality Act (CEQA).

Here, the fee award did not adequately assess the City's compliance with or advancement of HAA policies. That disserves Subdivision (p), which reflects the Legislature's intent to protect cities from fee awards even if certain aspects of a housing approval are successfully challenged.

Subdivision (p) creates a necessary and deliberate balance: courts may award fees only where the public interest vindicated by the litigation clearly outweighs the public interest in facilitating housing development. The statute makes its point forcefully, requiring "due weight" to HAA considerations before fees may be awarded to housing challengers (and in certain circumstances not present here, "shall rarely, if ever, be awarded"), absent bad faith by local government which is not shown here. That balance is essential to prevent cities from being penalized for doing what the Legislature has mandated — approving housing projects to meet urgent local and statewide needs. There are enough disincentives to approve housing in communities like Pacifica without risking the City budget on fee awards, too.

The award upsets this balance. Were its reasoning the rule, a partial CEQA victory — even one that does not halt a project or prevent housing production — would routinely earn fees against the approving city. Such suits would proliferate and the statute's housing goal would be subverted. This reading disserves both the text and intent of Subdivision (p).

Subdivision (p) was adopted precisely to prevent this dynamic — where cities are pressured from both sides and punished for facilitating the very housing the State seeks to promote. Reversal is required to enforce Subdivision (p) and to protect cities' and counties' ability to address the State's housing crisis.

II. JOINDER IN APPELLANT'S STATEMENT OF THE CASE

Cal Cities and CSAC join in the Statement of Facts and Procedural History in Appellant City of Pacifica's Opening Brief pursuant to California Rules of Court, rule 8.200(a)(5).

III. THE HOUSING ACCOUNTABILITY ACT IS INTENDED TO "TIP THE BALANCE" OF PUBLIC POLICY TO FOSTER HOUSING

The Legislature has concluded that California's housing supply and affordability challenges have become a crisis, threatening the economic vitality, social cohesion, and environmental sustainability of communities across the state. There is evidence for its conclusion. In 2025, Southern California house hunters needed household income of $213,600 — up 97% in five years — to buy a median residence, 51% pricier than in 2019. Affordability challenges in the Bay Area are even more severe. There, house hunters need $334,000 to buy — up 84% in five years.[1] Housing supply fares no better, consistently falling far short of demand. For example, only 19,700 new housing units were added to the Bay Area in 2024 — about 12% below the 5-year average of 21,000 units.[2] This is about 50,000 units below need, despite fewer households forming local demand.

Cities and counties, on the front lines of this crisis, are adopting accessory dwelling unit (ADU) ordinances, streamlining housing approval processes, reducing fees, and establishing Workforce Housing Opportunity Zones — areas in which relaxed zoning standards encourage housing affordable to those in the "missing middle," those too poor to afford market-rate housing and too prosperous to qualify for subsidized units.

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[1] <http://www.eastbaytimes.com/2025/05/19/why-more-construction-didnt-fix-californias-high-housing-costs/> (last viewed July 16, 2025).

[2] <http://vitalsigns.mtc.ca.gov/indicators/housing-production> (last viewed July 16, 2025).

To that end, the California Housing Accountability Act (HAA)— first enacted in 1982 and significantly strengthened in recent years — is central to the State's housing policy. Codified at Government Code § 65589.5, it prohibits local agencies from denying or reducing the density of housing development projects that meet applicable, objective standards, except under narrow circumstances supported by written findings demonstrating specific, adverse impacts on public health or safety. This and other Courts have enforced those policies. (E.g., *California Renters Legal Advocacy & Education Fund v. City of San Mateo* (2021) 68 Cal.App.5th 820 [City's requirement that multi-story housing vary the building height to protect adjacent lower-scale homes was not an enforceable objective standard].)

AB 1633 (2023) was enacted to clarify that CEQA may not be misused to indefinitely delay or obstruct housing projects that comply with the HAA, either by local agencies or by project opponents. But at the same time, AB 1633 does not create a wholesale exemption from CEQA for HAA-governed projects. Rather, it reflects a deliberate legislative compromise between two of California's most significant public policy priorities: promoting urgently needed housing development and preserving meaningful environmental review. That wider exemption has come just now with this year's bills: AB 130 creates a major new exemption from CEQA review for urban infill residential and mixed-use projects which meet specified requirements. SB 131 codifies several new CEQA exemptions, including rezonings which implement an approved housing element, farmworker housing, community water projects, wildfire risk management projects, and childcare centers, among others. Both bills also streamline review for projects greater than one million dollars, and limit scope of review in certain circumstances. All to accelerate housing and infrastructure development and streamline CEQA hurdles. Subdivision (p) must be understood in this context of legislative intent to reduce the utility of CEQA as a roadblock to housing development.

The HAA as a whole reflects the Legislature's recognition that California's growing housing needs may create tension with other important public policies, including local control and, critically here, environmental protection. While the HAA does not wholly disregard those other policies, it forcefully provides, in numerous ways, that such other interests cannot be allowed to hinder housing production.

In its initial form in 1982, the HAA was enacted to prevent local governments from arbitrarily denying housing development applications that complied with applicable general plan, zoning, and development standards in effect when an application was deemed complete. The Legislature has expanded and strengthened this "Hammer" of local agencies several times — but it has also recognized that "local Nimbyism" and obstruction of housing development can manifest in other ways, which can hinder even the most pro-housing jurisdictions from approving the most needed and desired projects.

For decades, CEQA was one of the most powerful "NIMBY" tools — *both* because of its exacting standards, *and* because even minor flaws in meeting those standards nearly always resulted in a costly award of attorney's fees to the project opponents under Code of Civil Procedure section 1021.5. This placed local agencies between Scylla and Charybdis — deny a housing project and risk the HAA "hammer"; approve the project and risk potentially ruinous financial exposure. The natural result of this conundrum was, all too often, exactly the sort of delay and inaction the HAA was designed to prevent — and the Legislature took notice.

AB 1633 embodies a balanced "stick and carrot" approach to the above-noted "Catch-22": It seeks to curtail CEQA abuse, protecting local governments that act in good faith to approve housing projects. It strengthens the HAA's enforcement mechanism — the "stick"— by making it more difficult for local agencies to misuse CEQA to delay or obstruct housing projects in urban areas or near transit. On the other hand, it offered a critical incentive to agencies —the "carrot"— by requiring courts to deny fee awards to housing challengers under Code of Civil Procedure section 1021.5 in most cases. Subdivision (p) is especially significant to local governments, given the Legislature's continued expansion of the

HAA's enforcement provisions and demonstrates a careful balance between maintaining environmental review but not rewarding such review with attorney's fees awards except in the most egregious situations. As the "stick" has grown heavier with each amendment, AB 1633's modest carrot becomes all the more essential.

AB 1633 clarified how certain CEQA-related inactions or delays would be considered a "disapproval" violating the HAA. Specifically, it empowers developers to challenge a local agency's failure to:

- Determine whether a project is exempt from CEQA;
- Adopt, approve, or certify an adequate CEQA document (e.g., MND, EIR); or
- Proceed without unwarranted CEQA review.

(Gov. Code, §§ 65589.5, subd. (k), 65589.5.1, 65589.5.2.)

To prevail in court, housing advocates must show a sufficient CEQA document was presented and a local agency either refused to act or abused its discretion. An abuse of discretion occurs when an agency, acting in bad faith or without substantial evidence, improperly demands further study rather than adopting or certifying a CEQA document. The HAA defines "bad faith" as an action that is "frivolous" or "otherwise entirely without merit." (Gov. Code, § 65589.5, subd. (l).)

However, the broadening of this approach put local government between a rock and a hard place without further legislative action under AB 1633. As discussed below, the legislative history of AB 1633 and the version of HAA amendment from the prior legislative session in 2021-2022 under AB 2656 demonstrates a concerted effort by the Legislature to address this dilemma cities and counties would otherwise face. The amendment to the subdivision ultimately limited cities' and counties' exposure to attorney's fees when a local agency acts reasonably and in good faith. (Gov. Code, § 65589.5, subd. (k)(1)(A)(ii)(II)(ia).) A court may not award fees if the city had:

- Reasonable cause to disapprove the project due to a controlling question of law under CEQA, or
- A substantial ground for difference of opinion as to CEQA requirements or the State CEQA Guidelines.

The carrot for local government is embodied in Subdivision (p), which limits fee awards to incentivize housing approvals, and disincentivize denials and delays.

Indeed, AB 1633's precursor, AB 2656 (2022), included a similar provision, reflecting the Legislature's intent to limit attorney fees to promote housing. This intent was explained more directly by legislative analysis to the Senate Committee on Governance and Finance during the prior legislative session when the same provision was presented as AB 2656:

> The bill also provides that upon any motion for an award of attorney's fees in a case challenging a local

> agency's approval of a housing development project, a court in weighing whether a significant benefit has been conferred on the general public or a large class of persons and whether the necessity of private enforcement makes the award appropriate, **shall give due weight to the policies of the HAA**, **the suitability of the site for a housing development, and the reasonableness of the local agency's decision.** The bill specifies that it is the intent of the Legislature that attorney's fees and costs shall rarely, if ever, be awarded against a local agency that, acting in good faith and with a substantial basis in the record and applicable law, approved a housing development project that satisfies conditions above.

(Senate Comm. on Governance and Finance, 2021-2022 Reg. Sess., Bill No. 2656.)[3] Analysts acknowledged the "rock and a hard place" entrapping local governments, offering what later became Subsection (p)'s limit on attorney fees to address this dilemma:

> Local governments are already under conflicting mandates to approve new housing under the HAA, but

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[3]<https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202120220AB2656#> (June 27, 2022 Senate Governance and Finance at p.6) (last viewed July 16, 2025).

to simultaneously adequately account for the environmental impacts of housing under CEQA. AB 2656 rachets up the pressure further by potentially subjecting local governments to the steep fines in the HAA if they require additional environmental review. Meanwhile, local governments are also still subject to litigation under CEQA if a NIMBY group or others allege that there are potentially significant impacts to the environment. In either case, someone on the other side is likely to allege that they violated the law, and in both cases, plaintiffs can recover their attorney's fees. AB 2656 currently provides that courts must consider the mandate under the HAA to approve housing when deciding to award attorney's fees to plaintiffs litigating an approval of a project under the HAA. But this **requirement leaves substantial discretion to the court and therefore may not provide the certainty that a local government truly needs to feel confident** in a decision to approve a categorical exemption or halt studying of environmental impacts when there may exist a fair argument that there are significant impacts, or otherwise find that the project is consistent with applicable objective standards. **Without greater certainty that the** consequences of a lawsuit challenging

> an approval of a housing development project won't result in attorney's fees, local governments might take longer with their environmental documents, knowing that once they call them final, they are subject to AB 2656's penalties. The Committee may wish to consider amending AB 2656 to provide greater certainty to local governments regarding the payment of attorney's fees.

(*Ibid*, emphasis added). Thus, Subdivision (p) was intended to reduce judicial discretion to award fees under Code of Civil Procedures section 1021.5 in cases like this.

AB 1633's legislative history similarly reflects this intent to balance accountability in local land use decision-making with housing production. For example, the Senate Committee on Housing emphasized that the bill "[p]rovides some additional protections for local governments who have been sued by neighbors or interest groups for approving a housing development project" and are seeking the award of attorney's fees, and that courts are "charged with carefully considering various priorities in the HAA" in those circumstances. (Sen. Com. on Housing, Report on AB 1633, June 20, 2023.)[4] When adopted the following year as AB 1633, trial courts

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[4]<https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202320240AB1633#> (June 15, 2023 Senate Housing at p. 8) (last viewed July 16, 2025).

were accordingly directed to weigh HAA goals first and foremost when considering fee award requests against cities and counties who were meeting HAA goals by approving housing; not to readily award attorney fees to those who challenge housing projects under CEQA.

From a policy standpoint, Subdivision (p) is essential. Local governments are on the front lines of implementing state housing goals, but they operate in a complex and unstable legal landscape. The risk of attorney's fees — for denying a project or approving it — undermines thoughtful, good-faith decision-making.

Subdivision (p) operates within the existing "private attorney general" framework of Code of Civil Procedure section 1021.5, but overlays an important gloss upon that analysis. In cases where a local agency's housing approval is set aside — and Section 1021.5 *only* comes into play when the agency is found to have made *some* error — the HAA requires to do what the Legislature itself has done, i.e., weigh housing production more heavily than other interests, even where those interests would normally be important enough to justify a fee award.

By requiring courts to give "due weight" to the fact a project approval furthers HAA policies, whether a project site is suitable for housing development, and the local government's reasonable actions in approving a proposed housing project (Gov. Code, § 65589.5, subd. (p)(1)), AB 1633 promotes a more secure environment for local decisionmakers. It sends a clear message: good faith housing approvals that align with state policy should not be punished. Instead, the overarching policy is that cities and counties should be protected when acting reasonably and serving California's housing goals. Indeed, the HAA itself makes clear, repeatedly, how much weight housing is "due."

The award here failed to apply this standard correctly, mistaking Subdivision (p)'s command and the City's compliance with HAA mandates. This Court should reverse and publish a decision explaining the legislative intent of Subdivision (p).

IV. THE AWARD MISAPPLIES THE STATUTE AND UNDERMINES STATE HOUSING GOALS

A. The Fee Award Disserves Legislative Intent and Subdivision (p)'s Words

The trial court's ruling disserves the HAA's intent to encourage — not punish — good faith local government decisions on housing development. The HAA states it is to be interpreted "to afford the fullest possible weight to the interest of, and the approval and provision of, housing." (Gov. Code, § 65589.5, subd. (a)(2)(L).) But the order on review achieves quite the opposite. This Court should reverse.

Subdivision (p) is intended to disincentivize NIMBY litigation by reducing opportunities for housing project opponents to recover attorney's fees — even if a plaintiff wins. AB 1633 declares that, in deciding whether to award fees, the court should give "due weight" to whether approval of the project furthered the purposes of the HAA. This provision changes the calculus for housing project foes by removing an incentive to sue. For, of course, it is the purpose of fee awards under Code of Civil Procedure section 1021.5 to encourage litigation which implements State policy, not that which frustrates it. (E.g., *Bui v. Nguyen* (2014) 230 Cal.App.4th 1357, 1373–1374 [reading "necessity of private enforcement" prong of CCP § 1021.5 test to encompass public policy].)

Subdivision (p)(1) states that upon any motion for an award of attorney's fees, the court must give due weight to:

> the degree to which the local agency's approval furthers policies of this section, including, but not limited to, subdivisions (a), (b), and (c), the suitability of the site for a housing development, and the reasonableness of the decision of the local agency."

(Gov. Code, § 65589.5, subd. (p)(1)(a).)

Such weighting defeats a fee award here. The City approved housing on an in-fill lot that included affordable units, in accord with HAA and other housing laws, in good faith compliance with statute and an expectation of Subdivision (p)'s protection. The fee award does not give proper weight to these factors. Pacifica's approval of the Vistamar Project furthered all applicable HAA policy goals: it is intended to deliver needed housing in a coastal area where new housing is rare, in a developed urban area that will not convert valuable agricultural land. (Appellant's Op. Br., pp. 36–41.) The City's approval furthered the HAA's policies by allowing development of eight for-sale units, including "the first and only deed-restricted low income unit approved [in the City] between 2007 and 2020." (*Ibid.*) The City thoroughly analyzed the project's economic, social, and environmental effects. It acted reasonably in its application processing, CEQA review, ana approval process. (Appellant's Op. Br., pp. 43–47.) Yet, the order awarding fees recites the court's personal knowledge of Pacifica rather than Census data and Public Resources Code Section 20171's definition of an urbanized area, and discounted the impact of these units on housing demand. Pacifica is not exempt from the HAA as a small coastal enclave.

As Appellant details, these eight homes are not inconsequential. The Housing Element Law (of which the HAA is part) requires all cities and counties to increase housing to meet the State's needs by addressing each locality's allocated share. Cities carefully craft their Housing Elements, zoning codes, and other policies in light of these required state and regional demands. Factored into that calculus is the HAA, including the policy considerations under Subsection (p). Local policies are diligently evaluated for consistency by the state Department of Housing and Community Development (HCD) who completes its duty under the

California Housing Element Law to review each city's Housing Element for compliance with state law and internal consistency.

The eight-unit Vistamar project is fully half the new housing permitted in Pacifica from 2015 to 2020. (Appellant's Op. Br., p. 40 [citing record evidence that Pacifica permits an average of 16 units per year].) There are no magic solutions here, but this was certainly a large effort to increase housing in the City. Given the scope of the challenge and decades of construction shortfalls, even marginal progress aids.

Nothing in the HAA reserves its protections for large-scale developments. Rather, the statutory text and legislative findings make clear that the HAA is intended to address California's housing crisis by incentivizing and protecting the production of *all* housing — regardless of size or scale or price-point. Every unit counts. The trial court's dismissal of the housing impact of this one project as "small and inconsequential when there is a shortage of two million housing units" statewide is directly contrary to the weighting mandated by the HAA — and to this court's own findings of the statewide concern and impact of a similarly-sized (ten-unit) housing project in nearby San Mateo. (*California Renters Legal Advocacy & Education Fund v. City of San Mateo*, *supra*, 68 Cal.App.5th at 820.) Whether viewed as legal error in construing the requirements of Subdivision (p), or simply as an abuse of discretion, clearly that cannot be right and cannot stand.

As such, attempts to minimize or discount smaller housing proposals are incompatible with both the language and the intent of the HAA. Misinterpretation of Subsection (p) erodes the ability of local government to address their local planning efforts to address local concerns and the statewide policy goals of promoting housing.

B. The Award Ignores Limitations on Fee Awards Against Public Agencies, Too

California law has long limited fee awards against public agencies, which taxpayers must fund. Enacted in 1977, Code of Civil Procedure section 1021.5, California's "private attorney general" statute, codifies a narrow exception to the American rule by authorizing fee-shifting in public interest cases — but in carefully defined circumstances. For nearly five decades, courts have consistently emphasized that section 1021.5 does not guarantee a fee award, even to prevailing parties. Rather, fee awards are subject to statutory criteria and to the sound discretion of the trial court.

Section 1021.5 authorizes an award only when: (1) the action enforces an important right affecting the public interest; (2) it confers a significant benefit on the general public or a large class of persons; and (3) the necessity and financial burden of private enforcement make such an award appropriate. (Cal. Civ. Proc. Code, § 1021.5.) These requirements serve to ensure that the statute rewards only those who advance the public interest, not personal goals. (*See, e.g., Ryan v. California Interscholastic Federation*, (2001) 94 Cal.App.4th

1033, 1047 [denying fees where public benefit was incidental]; *People ex rel. Brown v. Tehama County Bd. of Supervisors* (2007) 149 Cal.App.4th 422, 454 [Section 1021.5 is a "bounty" for public interest enforcement, not a reward for self-interested litigation].) In a nutshell, the private attorney general theory is intended to encourage important public interest litigation. It is not intended as a "reward for litigants motivated by their own interests who coincidentally serve the public." (*California Licensed Foresters Assn. v. State Board of Forestry* (1994) 30 Cal.App.4th 562, 570.)

Importantly, courts applying section 1021.5 balance the equities in determining whether, and to what extent, to award fees. As an equitable remedy, courts may reduce or deny attorney's fees where the asserted public benefit is minimal, speculative, or outweighed by the financial burden on public agencies. (*E.g., Satrap v. Pacific Gas & Electric Co.* (1996) 42 Cal.App.4th 72, 81–82.) This is critical in cases involving local governments, which provide vital services with limited resources. Indeed, Pacifica's current 10-year projection of its fiscal position indicates it is drawing on reserves and may deplete them entirely.[5] Unanticipated fee awards — sometimes reaching seven figures — can divert scarce taxpayer resources from essential public services such as public safety, infrastructure, education, and healthcare.

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[5] <www.cityofpacifica.org/home/showpublisheddocument/13672/638065357715870000 > (last viewed July 16, 2025).

California courts have long recognized that while section 1021.5 serves an important public purpose, it must not be applied to undermine the fiscal stability of the communities it seeks to protect. (E.g., *Serrano v. Priest* (1977) 20 Cal.3d 25, 49 [fact that award against public entity would ultimately fall upon taxpayers is relevant factor when determining its amount]; *County of Butte v. Dep't of Water Resources* (2023) 90 Cal.App.5th 147 [courts must consider the fiscal impact on public agencies in exercising discretion to award fees]; *Lyons v. Chinese Hospital Assn.* (2006) 136 Cal.App.4th 1331 [denial of fees upheld where litigation served private interest more than public]; *La Mirada Avenue Neighborhood Ass'n v. City of Los Angeles* (2018) 22 Cal.App.5th 1149 [public benefit must be clearly demonstrated to justify fees].)

Fee awards that jeopardize municipal budgets or compromise critical public functions exceed the statute's intended scope. In exercising discretion, courts are empowered — and indeed obligated — to ensure awards under section 1021.5 are both justified and proportionate, and that they do not impose undue hardship on the public at large.

V. CONCLUSION

For all these reasons, Cal Cities and CSAC respectfully request the Court reverse the trial court's fee award and remand with directions to deny Petitioners' motion for attorney's fees. It further asks the Court to publish an opinion in this case to clarify the intent and reach of Subdivision (p).

DATED: July 17, 2025

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CERTIFICATE OF COMPLIANCE WITH CALIFORNIA RULES OF COURT, RULE 8.204

We certify that, under rule 8.204(c)(1) of the California Rules of Court, this Amici Brief is produced using 13-point type and contains 4,240 words including footnotes, but excluding the application for leave to file, tables and this Certificate, fewer than the 14,000 words permitted by the rule. In preparing this Certification, we relied upon the word count generated by Microsoft Word 365 MSO.

DATED: July 17. 2025

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PROOF OF SERVICE

Coalition of Pacificans for an Updated Plan, et al. v. City of Pacifica, et al.
First Appellate District, Division Four Case No. A170704

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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 Los Angeles, State of California. My business address is 790 E. Colorado Boulevard, Suite 850, Pasadena, CA 91101-2109.

On July 17, 2025, I served true copies of the following document(s) described as **AMENDED BRIEF OF AMICI LEAGUE OF CALIFORNIA CITIES AND CALIFORNIA STATE ASSOCIATION OF COUNTIES IN SUPPORT OF APPELLANT CITY OF PACIFICA** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC SERVICE: I electronically transmitted the above document(s) to the person(s) at the e-mail address(es) set forth below via the TrueFiling electronic service portal.

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

Executed on July 17, 2025, at Pasadena, California.

/s/McCall Williams
McCall L. Williams

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