

Nos. 21-55395; 21-55404; 21-55408

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

LA ALLIANCE FOR HUMAN RIGHTS, et al.,
Plaintiffs – Appellees,

v.

COUNTY OF LOS ANGELES, et al.,
Defendants – Appellants.

On appeal from the United States District Court
for the Central District of California, No. 2:20-cv-02291-DOC-KES
Honorable David O. Carter

**LOS ANGELES HOMELESS SERVICES
AUTHORITY’S AMICUS BRIEF IN SUPPORT OF
APPELLANT COUNTY OF LOS ANGELES**

GREINES, MARTIN, STEIN & RICHLAND LLP

*Timothy T. Coates (SBN 110364)

tcoates@gmsr.com

Nadia A. Sarkis (SBN 227778)

nsarkis@gmsr.com

5900 Wilshire Boulevard, 12th Floor

Los Angeles, California 90036

(310) 859-7811 / Fax: (310) 276-5261

Attorneys for Amicus Curiae

LOS ANGELES HOMELESS SERVICES AUTHORITY

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, amicus curiae Los Angeles Homeless Services Authority hereby states as follows: the Los Angeles Homeless Services Authority has no parent company, and no publicly held corporation owns 10% or more of its stock.

Dated: June 10, 2021

**GREINES, MARTIN, STEIN &
RICHLAND LLP**

Timothy T. Coates
Nadia A. Sarkis

By: s/ Nadia A. Sarkis

Nadia A. Sarkis

Attorneys for Amicus Curiae
LOS ANGELES HOMELESS
SERVICES AUTHORITY

TABLE OF CONTENTS

	PAGE
CORPORATE DISCLOSURE STATEMENT	i
TABLE OF AUTHORITIES	iii
INTEREST OF <i>AMICUS CURIAE</i>	1
INTRODUCTION	2
ARGUMENT	4
I. As The Leader Of Los Angeles’s Re-Housing Efforts, LAHSA Can Authoritatively Speak To The Irreparable Harm That Will Result From The Preliminary Injunction.	4
A. LAHSA’s work developing a regional homeless service system.	5
B. The potential challenges of a solely interim housing approach.	7
C. The success of coordinated, system-wide programs.	11
II. The Preliminary Injunction Will Not Remedy Or Alleviate Structural Racism.	12
CONCLUSION	14
FORM 8. CERTIFICATE OF COMPLIANCE FOR BRIEFS	16

TABLE OF AUTHORITIES

	PAGE
<u>Rules</u>	
Federal Rules of Appellate Procedure	
Rule 26.1	i
Rule 29	1
<u>Other Authorities</u>	
<i>A Bridge Home Dashboard</i> , LAHSA, https://www.lahsa.org/data?id=50-a-bridge-home (last updated Jun. 8, 2021)	9
D. Srebnik, L. Sylla, M. Hoffman & R. Franzen, <i>Impact of a Supported Housing Prioritization System Using Vulnerability and High Service Utilization</i> , <i>Journal of Social Distress and the Homeless</i> , 26 J. Soc. Distress & Homeless 90 (2017), http://dx.doi.org/10.1080/10530789.2017.1328007	9
<i>LAHSA Commission Report Offers Path To Streamline Governance, Strength</i> (Mar. 5, 2021), https://www.lahsa.org/news?article=808-lahsa-commission-report-offers-path-to-streamline-governance-strength	6
LAHSA, <i>2020 Greater Los Angeles Homeless Count Results Data Summary</i> (June 12, 2021), https://www.lahsa.org/news?article=726-2020-greater-los-angeles-homeless-count-results	5, 11
LAHSA, <i>2020 Greater Los Angeles Homeless Count—Data Summary</i> (Feb. 3, 2021), https://www.lahsa.org/documents?id=4692-2020-greater-los-angeles-homeless-count-total-point-in-time-homeless-population-by-geographic-areas.pdf	4
LAHSA, <i>2021 State of Homelessness Presentation</i> , available at https://m.youtube.com/watch?v=bLXWajJER50	13

TABLE OF AUTHORITIES

	PAGE
LAHSA, <i>Guiding Principles and Practices for Local Responses to Unsheltered Homelessness</i> (Feb. 28, 2019), https://www.lahsa.org/documents?id=2951-guiding-principles-and-practices-for-unsheltered-homelessness.pdf	14
LAHSA, <i>Heidi Marston Delivers the State of Homelessness Address</i> , YOUTUBE (Mar. 19, 2021), available at https://m.youtube.com/watch?v=bLXWajJER50	4, 9
LAHSA, <i>Homeless Services Analysis: Envisioning an Optimal System in Los Angeles</i> 7 (Mar. 2020), https://www.lahsa.org/documents?id=4311-homeless-services-system-analysis-envisioning-an-optimal-system-in-los-angeles	4, 8
LAHSA, <i>Project Roomkey Interim Housing Program Policies and Procedures</i> (Jan. 8, 2021), https://www.lahsa.org/documents?id=4464-project-roomkey-interim-housing-program-policies-and-procedures	12
Lavena Staten & Sara K. Rankin, <i>Penny Wise but Pound Foolish: How Permanent Supportive Housing Can Prevent a World of Hurt</i> , Soc. Sci. Research Network, July 12, 2019, at 28, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3419187	10
The Committee for Greater LA, <i>No Going Back L.A. Report</i> (Sept. 2020), https://nogoingback.la/the-report-executive-summary/ & https://calstatela.patbrowninstitute.org/wp-content/uploads/2021/05/PBI_LACity_Homelessness_PUBLIC.pdf	6, 13
U.S. Interagency Council on Homelessness, <i>Caution is Needed When Considering “Sanctioned Encampments” or “Safe Zones”</i> (May 2018), https://www.usich.gov/resources/uploads/asset_library/Caution_Sanctioned_Encampments_Safe_Zones_052318.pdf	8
Zerger, Suzanne et al., <i>The Role and Meaning of Interim Housing in Housing First Programs for People Experiencing Homelessness and Mental Illness</i> , 84 Am. J. Orthopsychiatry 431 (2014), https://doi.org/10.1037/h0099842	7

Pursuant to Federal Rule of Appellate Procedure 29, the Los Angeles Homeless Services Authority (“LAHSA”) submits this amicus curiae brief in support of the County of Los Angeles’s appeal of the preliminary injunction order. All parties have consented to this filing.¹

INTEREST OF *AMICUS CURIAE*

LAHSA is an independent joint powers authority, created in 1993 to oversee the region’s homelessness response. In this capacity, it serves as the lead agency in the Department of Housing and Urban Development-funded Los Angeles Continuum of Care, and coordinates and manages over \$800 million annually in federal, state, county, and city funds for programs providing shelter, housing, and services to persons experiencing homelessness.

LAHSA has deep knowledge and experience addressing the homelessness crisis in Los Angeles, and a substantial interest in promoting an evidence-based and equitable approach to a complex, regional problem. It also has a substantial interest in this litigation: LAHSA’s ongoing work to prevent homelessness, rehouse people experiencing homelessness, respond to these citizens’ health and safety needs, and support the creation of permanent housing solutions will be set back if the district court’s April 20, 2021 Order is allowed to stand.

¹ *Amicus* confirms that no counsel for a party authored this brief in whole or in part and no one other than *amicus* or its counsel contributed any money to fund its preparation or submission.

INTRODUCTION

LAHSA is uniquely positioned to inform the Court about the immediate, real-world impact of the district court's preliminary injunction, and how it will harm the very people it is intended to help. In particular, LAHSA would like to focus this Court's attention on two aspects of the injunction that are particularly problematic:

- **The district court's substitution of its policy judgements for the City and County's data-driven allocation of resources creates confusion and excludes essential aspects of the homelessness services system.** LAHSA, in partnership with the City and County, has put careful thought into the creation of a balanced homeless services system using finite resources—a system that not only serves the most acute, short-term needs of the unhoused, but also sufficiently invests in the permanent housing and prevention strategies needed to reduce homelessness in an enduring way. The Order upends that work in a way that is truly counterproductive. Homelessness is a complicated, regional problem that cannot be effectively addressed without a collaborative and coordinated regional response.
- **The preliminary injunction will exacerbate the disproportionate impact of homelessness on communities of color and fails to take into account current efforts to address systemic racism that have shown success.** LAHSA agrees that systemic racism has shaped the

housing crisis in Los Angeles, and its work to advance racial equity and equitably deploy the homeless services system's available resources are key priorities. But the injunctive relief outlined bears no relationship to addressing institutional racism. By focusing on ad-hoc, short-term solutions, the Order threatens to undermine the focused work government and community partners are undertaking specifically designed to address structural racism.

LAHSA welcomes and shares a sense of urgency in addressing the homelessness crisis. But the Order does not provide the relief that people experiencing homelessness urgently need. LAHSA is not alone in that belief: It is telling that the many nonprofits dedicated to addressing Los Angeles's homelessness crisis view the district court's Order as harmful to their data and policy-driven work. LAHSA supports the County's appeal of the preliminary injunction order, and submits that reversal is essential to prevent the disruption of its mission to create cost-effective, long-term solutions to homelessness in our community.

ARGUMENT

I. As The Leader Of Los Angeles’s Re-Housing Efforts, LAHSA Can Authoritatively Speak To The Irreparable Harm That Will Result From The Preliminary Injunction.

Nearly one in four unsheltered homeless people in this country call the Los Angeles streets their home.² And the crisis shows no sign of abatement: The most recent unsheltered count revealed an unhoused population of more than 66,436 people in Los Angeles County, an unacceptable number by any measure.³

But the numbers leave out an important part of the story: Over the last three years, LAHSA has helped place more than 64,568 people in permanent housing, nearly all of L.A. County’s population experiencing homelessness at any point in time.⁴ The challenge is that for every 207 people who make their way back into permanent housing each day in Los Angeles, 227 others are pushed into

² LAHSA, *Homeless Services Analysis: Envisioning an Optimal System in Los Angeles*, 7 (Mar. 2020), <https://www.lahsa.org/documents?id=4311-homeless-services-system-analysis-envisioning-an-optimal-system-in-los-angeles> [*Homeless Services Analysis*].

³ LAHSA, *2020 Greater Los Angeles Homeless Count—Data Summary* (Feb. 3, 2021), <https://www.lahsa.org/documents?id=4692-2020-greater-los-angeles-homeless-count-total-point-in-time-homeless-population-by-geographic-areas.pdf>.

⁴ LAHSA, *Heidi Marston Delivers the State of Homelessness Address*, YOUTUBE (Mar. 19, 2021), available at <https://m.youtube.com/watch?v=bLXWajJER50> [*State of Homelessness Address*].

homelessness.⁵ That gap and the broader social dynamics that are driving more and more people to lose their homes make interim housing a vital component of the homeless services system. But it is a stop-gap measure.

Local and County leaders have been working to create a balanced, effective, and equitable system. Those efforts are building momentum and showing success. Even the Plaintiffs in this case have recognized the unprecedented efforts of local government and its partners. The preliminary injunction would undo that progress.

A. LAHSA's work developing a regional homeless service system.

As a joint powers authority, collaboration and coordination between the City and County is LAHSA's reason for being. Operating as one integrated unit, LAHSA's evidence-based interventions leverage resources system-wide and reduce the administrative burden of a highly complex system. That work includes the expansion of a coordinated entry system (CES) and homeless management information system (HMIS)—crucial tools to measure the effectiveness of programs within the homeless services system.⁶ And it involves partnering with the City and County to create strategic, long term plans, including the City's

⁵ LAHSA, *2020 Greater Los Angeles Homeless Count Results Data Summary* (June 12, 2021), <https://www.lahsa.org/news?article=726-2020-greater-los-angeles-homeless-count-results> [2020 L.A. Homeless Count Results].

⁶ A community-wide database that tracks demographic and service usage data is also mandated by HUD's Continuum of Care Program.

Comprehensive Homeless Plan and the County's Approved Strategies To Combat Homelessness.

Before the creation of a regional system and systemwide planning effort, little to no coordination existed when service providers outreached to unsheltered individuals. This led to waste: Fragmented services and repeat interactions with as many as ten different entities. It also contributed to a lack of accountability and inconsistent and inequitable results. Successful placement in permanent housing depended more on the connections or skills of a particular case manager than anything else.

While LAHSA and the system as a whole has made progress, LAHSA recognizes the urgent need for continued reforms and experimentation including systems change. In partnership with Public Housing Authorities, LAHSA recently launched Housing Central Command and a Universal Housing Application to streamline and cut the wait time for access to permanent housing.⁷ LAHSA has embraced the work of the City and County on governance reform to create greater accountability and is a partner on Alternatives to Incarceration to stop the cycle from homelessness to incarceration and back again.⁸ These initiatives are driven

⁷ LAHSA, *LAHSA Commission Report Offers Path To Streamline Governance, Strength* (Mar. 5, 2021), <https://www.lahsa.org/news?article=808-lahsa-commission-report-offers-path-to-streamline-governance-strength>.

⁸ The Committee for Greater LA, *No Going Back L.A. Report* (Sept. 2020), <https://nogoingback.la/the-report-executive-summary/> &

by the work of the City and County and are not evaluated or discussed in the preliminary injunction.

B. The potential challenges of a solely interim housing approach.

Among LAHSA's core functions is its role as the leader of the City and County's interim rehousing efforts, providing the safety net of last resort when other systems have failed. Interim housing options alleviate the trauma of being unsheltered and are an essential pillar of the homeless services system. But based on decades of experience, LAHSA can say with authority that to be successful, interim housing must be coupled with a balance of permanent housing and can present several challenges:

- People experiencing homelessness often have complex physical and mental health needs. LAHSA coordinates with the County Departments of Health Services and Mental Health to provide clinical care and access to specialized housing for this population, such as sobering centers, hospice care, and residential care facilities equipped to care for the gravely disabled or those needing skilled nursing care. Shelters are ill-equipped to serve the needs of these particularly vulnerable individuals.⁹

https://calstatela.patbrowninstitute.org/wp-content/uploads/2021/05/PBI_LACity_Homelessness_PUBLIC.pdf.

⁹ For example, people with mental illness who enter interim housing report worsened mental health symptoms, reduced engagement with service providers, and inconsistent progress in other recovery goals. *See* Zerger, Suzanne et al., *The Role and Meaning of Interim Housing in Housing First Programs for People*

- Interim housing is a costly intervention, and over-reliance on interim housing undermines the overall efficiency of the homeless services system. Shelters are more expensive to operate than almost any other form of housing—approximately \$60/day per person. And that is on the low side. LAHSA has been asked to fund interim interventions that cost as much as \$80/day or \$28,800 per year. By comparison, permanent supportive housing, including services, averages \$16,000 per year (approximately \$44/day).
- Without adequate permanent housing, interim housing is often a bridge to nowhere. The evidence shows that the vast majority of individuals housed in shelters eventually return to the streets, which should not be surprising as interim shelter beds are temporary by design.¹⁰

A balanced homeless services system requires 5 permanent homes for every 1 temporary bed.¹¹ That balance ensures that people are not only able to get under a roof, but also able to access a permanent home quickly. Because it is permanent

Experiencing Homelessness and Mental Illness, 84 Am. Jl. Orthopsychiatry 431 (2014), <https://doi.org/10.1037/h0099842>.

¹⁰ Temporary solutions have little impact on reducing homelessness. See U.S. Interagency Council on Homelessness, *Caution is Needed When Considering “Sanctioned Encampments” or “Safe Zones”* (May 2018), https://www.usich.gov/resources/uploads/asset_library/Caution_Sanctioned_Encampments_Safe_Zones_052318.pdf.

¹¹ *Homeless Services Analysis*, *supra* note 2, at 23.

housing that achieves a true end to homelessness, not interim shelter. Ninety-five percent of people permanently housed through LAHSA's system do not return to homelessness.¹² By comparison, those placed in interim housing are far more likely to return to the streets.¹³

Permanent housing also serves to make the system more cost efficient. Usage metrics show that scaling interim housing out of proportion with the rest of the system has unintended consequences. In recent years, even though more people are being served in interim housing, the lengths of stay have also dramatically increased. In 2017, 7.7 individuals were served in each interim housing bed, but that number decreased to 5.1 individuals per bed in 2019.¹⁴

Prioritizing permanent housing creates other efficiencies as well. An estimated 10-20 percent of the homeless population accounts for 56-60 percent of public service costs.¹⁵ When the most vulnerable—and highest cost—users of the

¹² *2021 State of Homelessness Presentation*, *supra* note 4.

¹³ *A Bridge Home Dashboard*, LAHSA, <https://www.lahsa.org/data?id=50-a-bridge-home> (last updated Jun. 8, 2021).

¹⁴ *Id.* at p. 28.

¹⁵ D. Srebnik, L. Sylla, M. Hoffman & R. Franzen, *Impact of a Supported Housing Prioritization System Using Vulnerability and High Service Utilization*, *Journal of Social Distress and the Homeless*, 26 J. Soc. Distress & Homeless 90 (2017), <http://dx.doi.org/10.1080/10530789.2017.1328007> (noting Client Care Coordination program in King County, Washington, prioritizing housing placement based on clinical need and high-cost public service use, showed \$2.8 million reduction in the use of public services, comparing year following permanent housing entrance and the year prior).

homeless services system are placed in permanent housing, municipalities dramatically cut costs by (1) reducing the use of emergency services, hospitals, detoxification centers and shelters, and (2) decreasing interaction with the criminal justice system. Those cost savings are often equal or exceed the cost of permanent supportive housing.¹⁶

The City and County appropriately takes those efficiencies into account when they make decisions on how to allocate resources, as they must because those resources remain scarce. Even though LAHSA's funding—approximately \$880 million for the most recent fiscal year—has increased 728% over a five-year period, the Los Angeles system still needs an estimated \$500 million in additional annual funding beyond current levels to achieve a functional end to homelessness.¹⁷

The district court's Order plainly disregards the City and County's investment in long-term solutions to homelessness in favor of its own policy preferences. But it does more than that: By shifting all resources away from permanent housing, the Order is manifestly against the public interest, and threatens to do real and irreparable harm.

¹⁶ See Lavena Staten & Sara K. Rankin, *Penny Wise but Pound Foolish: How Permanent Supportive Housing Can Prevent a World of Hurt*, Soc. Sci. Research Network, July 12, 2019, at 28, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3419187.

¹⁷ *Id.* at 6.

C. The success of coordinated, system-wide programs.

The evidence shows that a coordinated, regional response is effective. Coordinated response can include location-based initiatives, but the connection to regional approach and resources is critical. LAHSA highlights two recent examples:

Increase in Permanent Housing. The creation of a regional system and systemwide planning effort, coupled with the infusion of resources, has led the number of annual housing placements to increase from 9,658 in 2014 (when the CES was expanded) to 22,719 in 2019, a 136% increase over five years. 732 new permanent supportive housing units opened in 2019. And while the preliminary injunction threatens to derail this progress by requiring funds already allocated to permanent housing to be put in escrow, 2,360 more permanent supportive homes are currently scheduled to open in the next twelve months with a total construction pipeline of 10,638 homes.¹⁸

Project Roomkey. LAHSA's COVID response is exemplary of the value of a coordinated, regional response that prioritizes the most vulnerable. With eighty-eight cities and county providers working toward a unified goal to avert a public health crisis among the homeless population, LAHSA worked with the City and County to increase housing capacity by over 6,000 beds with Project Roomkey, a 31.4% increase in Los Angeles' sheltering capacity in the span of less than five

¹⁸ 2020 L.A. Homeless Count Results, *supra* note 5.

months. (Dkt. 248-1, p. 8.) LAHSA's unified response meant that people were housed faster than ever before and also made it possible to appropriately standardize care and services so that clients would know what to expect and quality was ensured.¹⁹ Whole encampments were housed into Project Roomkey by utilizing coordinated outreach and a multidisciplinary approach.

But that progress has recently been stymied. Some Project Roomkey sites report receiving only 25% of the number of referrals that they previously received using a regional referral model, after referrals directed by the district court were put in place.

II. The Preliminary Injunction Will Not Remedy Or Alleviate Structural Racism.

Make no mistake: Black people are far more likely than White people to experience homelessness in Los Angeles County and that is a byproduct of institutional and structural racism in housing, education, criminal justice, employment, health care and access to opportunities. But Judge Carter's Order will not solve structural racism. It will make it worse.

LAHSA is committed to advancing racial equity in the homeless services system. To that end, it convened an Ad Hoc Committee on Black People

¹⁹ LAHSA, *Project Roomkey Interim Housing Program Policies and Procedures* (Jan. 8, 2021), <https://www.lahsa.org/documents?id=4464-project-roomkey-interim-housing-program-policies-and-procedures>.

Experiencing Homelessness in 2018. The Committee issued a report that makes 67 concrete recommendations on how to most effectively address the overrepresentation of Black people in Los Angeles' unhoused population, informed by 9 months of meetings with community leaders, service providers, policymakers, and people with lived experience of homelessness.²⁰ LAHSA's work in effectuating those recommendations has already shown results. Among the new clients LAHSA enrolled into programs and services last year, 35% of the clients served were Black, 34% were Latino, and 46.7% of permanent housing placements in 2020 were Black individuals or families.²¹

LAHSA welcomes concerted action to address structural racism within the homeless services system. To the extent that this litigation can advance and accelerate the recommendations set forth in the Ad Hoc Committee's Report, that would help Los Angeles make progress in addressing racism in a constructive and enduring way. But the preliminary injunction does the opposite. The district court's directives were not based on any qualitative analysis of what interventions have been successful in addressing racism. And the district court was not receptive to LAHSA's efforts to share such data and information on racism. When LAHSA's Executive Director sought to provide information regarding its successful, on-going implementation of anti-racism initiatives, the district court

²⁰ *Ad Hoc Committee Report*, *supra* note 8, at 47-63.

²¹ LAHSA, *2021 State of Homelessness Presentation*, available at <https://m.youtube.com/watch?v=bLXWajJER50>.

refused. And the district court would not permit the Chair of LAHSA's Lived Experience Advisory Board to speak at all. (Dkt. 117, pp. 5-11.)

Temporarily housing people on an expedited basis will *not* right the wrong of institutional racism. To the contrary, the coupling of large-scale interim housing with enforcement strategies will lead to the criminalization of homelessness in a way that disproportionately impacts Black people experiencing homelessness and does not address the entrenched nature of institutional racism. The evidence shows that building relationships and making services and permanent housing available will serve the most vulnerable on Los Angeles's streets.²² The City, County and LAHSA are balancing budget priorities, vulnerable populations and the need for systems change. Removing their and LAHSA's flexibility to use data-driven approaches will cause harm to individuals and result in costly chaos.

CONCLUSION

The preliminary injunction fails to recognize the complexities of large-scale homelessness, places the district court's policy decisions above those of local government, diverts vital resources that are currently being deployed using proven strategies, and potentially exacerbates institutional and structural racism. In other

²² See LAHSA, *Guiding Principles and Practices for Local Responses to Unsheltered Homelessness* (Feb. 28, 2019), <https://www.lahsa.org/documents?id=2951-guiding-principles-and-practices-for-unsheltered-homelessness.pdf>.

words, the Order harms the highly vulnerable population that it purports to help.
LAHSA supports the County's efforts to reverse the injunction.

Dated: June 10, 2021

**GREINES, MARTIN, STEIN &
RICHLAND LLP**

Timothy T. Coates
Nadia A. Sarkis

By: s/ Nadia A. Sarkis

Nadia A. Sarkis

Attorneys for Amicus Curiae
LOS ANGELES HOMELESS
SERVICES AUTHORITY

FORM 8. CERTIFICATE OF COMPLIANCE FOR BRIEFS

9th Cir. Case Number(s) 21-55395; 21-55404; 21-55408

I am the attorney or self-represented party.

This brief contains 2,948 words, excluding the items exempted by Fed. R. App. P. 32(f). The brief's type size and typeface comply with Fed. R. App. P. 32(a)(5) and (6).

I certify that this brief (*select only one*):

☐ complies with the word limit of Cir. R. 32-1.

☐ is a **cross-appeal** brief and complies with the word limit of Cir. R. 28.1-1.

☒ is an **amicus** brief and complies with the word limit of Fed. R. App. P. 29(a)(5), Cir. R. 29-2(c)(2), or Cir. R. 29-2(c)(3).

☐ is for a **death penalty** case and complies with the word limit of Cir. R. 32-4.

☐ complies with the longer length limit permitted by Cir. R. 32-2(b) because (*select only one*):

☐ it is a joint brief submitted by separately represented parties;

☐ a party or parties are filing a single brief in response to multiple briefs; or

☐ a party or parties are filing a single brief in response to a longer joint brief.

☐ complies with the length limit designated by court order dated _____.

☐ is accompanied by a motion to file a longer brief pursuant to Cir. R. 32-2(a).

Dated: June 10, 2021

By: s/ Nadia A. Sarkis
Nadia A. Sarkis