

UNITED STATES SENATE COMMITTEE ON THE JUDICIARY
QUESTIONNAIRE FOR NON-JUDICIAL NOMINEES

PUBLIC

1. **Name:** State full name (include any former names used).

Harmeet Kaur Dhillon.

I went by the name Harmeet Kaur Dhillon Singh from 1989-1990 during my first marriage.

2. **Position:** State the position for which you have been nominated.

Assistant Attorney General for Civil Rights.

3. **Address:** List current office address. If city and state of residence differs from your place of employment, please list the city and state where you currently reside.

177 Post St., Suite 700
San Francisco, CA 94108

My law firm has five offices nationally; I'm resident in the San Francisco office.

4. **Birthplace:** State date and place of birth.

Chandigarh, India October 2, 1968.

5. **Education:** List in reverse chronological order each college, law school, or any other institution of higher education attended and indicate for each the dates of attendance, whether a degree was received, and the date each degree was received.

Dartmouth College, A.B. Classical Studies, 1985-1989.
University of Virginia Law School, JD, 1990-1993.

6. **Employment Record:** List in reverse chronological order all governmental agencies, business or professional corporations, companies, firms, or other enterprises, partnerships, institutions or organizations, non-profit or otherwise, with which you have been affiliated as an officer, director, partner, proprietor, or employee since graduation from college, whether or not you received payment for your services. Include the name and address of the employer and job title or description.

Assistant Editor, Policy Review Magazine, The Heritage Foundation, 214 Massachusetts Ave
NE Washington, DC 20002-4958. 1989-1990.

The Newport News Daily Press, beat reporter (school boards), summer of 1990.

Center for Individual Rights, summer of 1991. Law Clerk/Summer Associate.

U.S. Department of Justice, Civil Division, Constitutional Torts Section (Bivens), summer of 1992. Law Clerk.

Shearman & Sterling, Summer Associate/Law Clerk in NY litigation department, summer of 1993 prior to clerkship.

Chambers of Hon. Paul V. Niemeyer, 4th Circuit Court of Appeals, Baltimore MD, 1993-1994.

Shearman & Sterling, Litigation Associate in NY, 1994-1998. During this time, seconded by Shearman to Freshfields, 1997-1998.

Sidley Austin, Litigation Associate, 1998-2000.

Cooley Godward LLP, Associate, 2000-2002, Palo Alto, CA.

Support Network for Battered Women, Director, 2001-2003 (now part of the YMCA of Silicon Valley) (volunteer position).

Trustee, The Sikh Foundation, 2001-2009 (volunteer position).

Orrick Herrington & Sutcliffe, Of Counsel, 2003-2004 San Francisco, CA.

American Civil Liberties Union of Northern California, Director 2003-2005 (also chair of the Audit and Election Committees during parts of this tenure) (volunteer position).

The Dhillon Law Firm (sole proprietorship) 2004-2005.

California Women's Leadership Association Director 2004-2005 (volunteer).

San Francisco Republican Party 2004-2005 Central Committee Member (appointed) (volunteer).

Dontzin Law Firm, Associate 2005.

Gibbs & Oliphant, Partner 2006.

Dhillon Law Group, Partner 2006-present (known as Dhillon & Smith from 2006-2014).

Center for American Liberty, CEO and Founder, 2019-Present.

7. Military Service and Draft Status: Identify any service in the U.S. Military, including dates of service, branch of service, rank or rate, serial number (if different from social security number) and type of discharge received, and whether you have registered for selective service.

None.

8. Honors and Awards: List any scholarships, fellowships, honorary degrees, academic or professional honors, honorary society memberships, military awards, and any other special recognition for outstanding service or achievement.

Dartmouth Dean's List 1988-1989

University of Virginia Law Review Editorial Board, 1991-1993

Lawyers Committee for Human Rights (NY) – Recognition for pro bono service in asylum case (approximately 1995)

Minority Bar Council Outstanding Community Service Award, 2002

Centennial Foundation of Canada Distinguished Community Service Award, 2003

Best Lawyers Under 40 Award – National Asian Pacific American Bar Association, 2007

Outstanding Attorney Award – South Asian Bar Association of Northern California, 2010

Northern California Super Lawyer – Super Lawyers Magazine, 2011-2024

Cornerstone Award – North American South Asian Bar Association, 2012

Woman Leader in Law – The Recorder, 2012

SALDEF Public Service Award” – Sikh American Legal Defense and Education Fund (SALDEF), 2013

Woman of the Year – California Women's Leadership Association

Top 100 Lawyers in California – Daily Journal, 2018

Republican National Lawyers Association Lawyer of the Year – 2018

City of Lancaster, CA Mayor’s Commendation for excellence in defense of civil liberties (citing various cases) – October 23, 2024

9. Bar Associations: List all bar associations or legal or judicial-related committees, selection panels or conferences of which you are or have been a member, and give the titles and dates of any offices which you have held in such groups.

Federalist Society, University of Virginia, Member 1990-1993 and President, 1992-1993

Federalist Society, San Francisco Bay Area, member 2001-2005

South Asian Bar Association of Northern California, At-Large Board Member, 2001-2004

South Asian Bar Association of Northern California, At-Large Board Member, 2007-2009 and Chair, Civil Rights Committee

Minority Bar Coalition of Northern California Executive Committee member, 2008-09

San Francisco Bar Association Judicial Nomination Committee, 2011-2013

Republican National Lawyers Association Board of Governors, 2016-2025; Vice President for Communications, 2017 to 2019; co-Chair, 2019 to 2021; Chairman, 2021 to 2023

Federalist Society Free Speech & Election Law Executive Committee, 2020-present

10. Bar and Court Admission:

a. List the date(s) you were admitted to the bar of any state and any lapses in membership. Please explain the reason for any lapse in membership.

New York – February 6, 1995

California – June 23, 2000

I was also a Solicitor of the Supreme Court of England and Wales from 1998 until about 2008. I voluntarily dropped membership due to lack of need for the credential and difficulty in maintaining status.

b. List all courts in which you have been admitted to practice, including dates of admission and any lapses in membership. Please explain the reason for any lapse in membership. Give the same information for administrative bodies that require special admission to practice.

Jurisdiction	Admission Date
US District Court – District of Columbia	2/1/2021
US District Court – NY - SD	5/9/1995
US District Court – CA - CD	8/5/2010
US District Court – CA - ED	7/6/2009
US District Court – CA - ND	7/10/2000
US District Court – CA - SD	4/27/2012
US District Court – CO	8/23/2024
US Court of Appeals 2nd Circ	4/27/1999
US Court of Appeals 5th Circ	11/11/2021
US Court of Appeals 6th Circ	9/21/2021
US Court of Appeals 9th Circ	4/16/2001
US Court of Appeals 11th Circ	4/1/2020
US Court of Appeals District of Columbia	3/27/2024
Supreme Court of the United States	5/1/2021

I have also been admitted *pro hac vice* in the following jurisdictions:

USDC Pro Hac Vice Appearances	Order Granting Appearance Pro Hac Vice	Case Terminated	Case Number	Case Title
Arizona	2/28/2022	2/7/2024	2-22-cv-122	Greenburg v. Wray <i>et al.</i>
Arizona	5/27/2022	1/3/2024	2-22-cv-859	Wray et al v. Greenburg <i>et al.</i>
Arizona	8/10/2020	1/21/2021	2:20-CV-01554	Compu-Tax & Accounting LLC v. Bank of America NA <i>et al.</i>
Arizona	6/8/2020	1/21/2021	2:20-CV-00985	Panda Accounting LLC v. Academy Bank NA <i>et al.</i>
Georgia - Middle District	8/12/2020	1/14/2021	1-20-CV-142	Cleghorn Financial Operations, Inc. v. AMERIS BANK <i>et al.</i>
Georgia - Northern District	5/19/2021	N/A	1-21-cv-1722	Project Veritas v. Cable News Network, Inc.
Georgia - Northern District	8/29/2022	12/18/2024	1:22-cv-01734	Vote.org <i>et al.</i> v. Georgia State Election Board <i>et al.</i>

Georgia - Southern District	8/18/2020	12/1/2020	4:20-CV-00160	Williams & Haupt, P.C. v. Century Bank <i>et al.</i>
Hawaii	6/16/2020	9/21/2020	1:20-CV-00273	Carmichael v. Ige
Massachusetts	10/3/2012	8/1/2013	4:12-CV-11820	Agama Solutions, Inc. v. Orasys, LLC.
Nevada	9/27/2016	7/19/2019	2:16-CV-01748	Beta Soft Systems, Inc. v. The Yosemite Group, LLC <i>et al.</i>
North Carolina -Western District	10/1/2020	1/13/2021	3:20-CV-00405	Fisher, P.A. v. Bank of America, N.A., <i>et al.</i>
Pennsylvania - Eastern District	8/27/2019	2/7/2020	2:19-CV-03299	REBEL NEWS NETWORK LTD. v. GATE 1 TRAVEL, LTD.
Pennsylvania - Middle District	9/21/2021	3/31/2022	1-19-cv-622	The Public Interest Legal Foundation v. Boockvar <i>et al.</i>
Puerto Rico	8/18/2021	10/26/2021	3:21-CV-01347	Tucker v. AD Practitioners LLC <i>et al.</i>
Texas - Eastern District	6/10/2019	12/19/2019	4:19-CV-00418	Stiles v. CVS Pharmacy Inc.
Texas - Eastern District	9/9/2019	6/3/2020	4:19-CV-00489	Stiles v. H-E-B, LP
Texas - Eastern District	6/10/2019	10/23/2019	4:19-CV-00417	Stiles v. Target Corporation
Texas - Eastern District	6/10/2019	10/23/2019	4:19-CV-00420	Stiles v. Wal-Mart Stores Inc.
Texas - Northern District	8/13/2024	N/A	7:24-cv-00114	X Corp v. World Federation of Advertisers <i>et al.</i>
Texas - Northern District	10/6/2005	4/18/2007	3:05-CV-01321	Telesis, II v. Durus Capital Management (N.A.), LLC <i>et al.</i>
Texas - Southern District	10/29/2012	12/13/2012	4:12-CV-02717	Advent Global Solutions, Inc v. Shah <i>et al.</i>
Vermont	9/15/2020	9/16/2020	5:20-cv-00131	Martel <i>et al.</i> v. Condos
Vermont	7/24/2024	N/A	2:24-cv-00783	Antonucci <i>et al.</i> v. Winters <i>et al.</i>
Virginia - Eastern District	2/25/2022	10/24/2022	3:21-cv-00756	Democratic Party of Virginia <i>et al.</i> v. Brink <i>et al.</i>
Washington - Western District	1/7/2011	6/26/2013	2-10-cv-1915	United States of America v. 2007 Aston Martin DB9 Automobile
Washington - Western District	6/25/2024	N/A	3:24-cv-05466	Jaman <i>et al.</i> v. City of Port Townsend <i>et al.</i>
Washington - Western District	3/31/2010	7/21/2010	2:10-CV-00549	A Dot Corporation v. Anthony Bay, <i>et al.</i>

State Pro Hac Vice Appearances	Order Granting Appearance Pro Hac Vice	Case Terminated	Case Number	Case Title
New Jersey Superior Court, Bergen County	10/6/2022	2/15/2024	BER-C-000163-22	Foda v. Valley Health System, Inc., <i>et al.</i>
Arizona Superior Court, Maricopa	5/27/2022	9/20/2023	CV2022-001353	Greenburg v. Wray, <i>et al.</i>
Oregon Circuit Court, Multnomah County	7/8/2020	9/21/2022	20CV19618	Andy Ngo v. Rose City Antifa, <i>et al.</i>
Pennsylvania Supreme Court	11/10/2021	N/A	244 MD 2021	Doug McLinko v. Commonwealth of Pennsylvania, Department of State, <i>et al.</i>

11. Memberships:

a. List all professional, business, fraternal, scholarly, civic, charitable, or other organizations, other than those listed in response to Questions 9 or 10 to which you belong, or to which you have belonged, since graduation from law school. Provide dates of membership or participation, and indicate any office you held. Include clubs, working groups, advisory or editorial boards, panels, committees, conferences, or publications. n/a

b. Indicate whether any of these organizations listed in response to above currently discriminate or formerly discriminated on the basis of race, sex, religion or national origin either through formal membership requirements or the practical implementation of membership policies. If so, describe any action you have taken to change these policies and practices. n/a

12. Published Writings and Public Statements:

a. List the titles, publishers, and dates of books, articles, reports, letters to the editor, editorial pieces, or other published material you have written or edited, including material published only on the Internet. Supply four (4) copies of all published material to the Committee.

I performed an exhaustive search of my files and the internet, with the assistance of several colleagues and media professionals, to identify and record answers to this question. It is possible that materials exist that are neither on the internet, nor in my files, but I and many others have done our best to comply with this request.

Responsive items are included in the Appendix.

b. Supply four (4) copies of any reports, memoranda or policy statements you prepared or contributed in the preparation of on behalf of any bar association, committee, conference, or organization of which you were or are a member. If you do not have a copy of a report, memorandum or policy statement, give the name and address of the organization that issued it, the date of the document, and a summary of its subject matter.

The following are all during my leadership at the Republican National Lawyers Association, and I participated in their drafting:

September 20, 2018

Statement on Kavanaugh Nomination

https://www.rnla.org/statement_from_young_and_dhillon_kavanaugh_nomination

October 3, 2018

Women Leaders' Letter in Support of the Nomination of Brett Kavanaugh to the U.S. Supreme Court

https://d3n8a8pro7vhmx.cloudfront.net/rnla/pages/1148/attachments/original/1538591991/RNL_A_Women_Leaders_Letter_in_Support_of_Kavanaugh_10_2018.pdf?1538591991

April 22, 2019

Letter to House Committee on Oversight and Reform re: Subpoena to Mazars USA LLP for Confidential Information

https://d3n8a8pro7vhmx.cloudfront.net/rnla/pages/1393/attachments/original/1555961659/RNL_A_Letter_re_Subpoena_to_Trump_Accountants_4-22-19..pdf?1555961659

c. Supply four (4) copies of any testimony, official statements or other communications relating, in whole or in part, to matters of public policy or legal interpretation, that you have issued or provided or that others presented on your behalf to public bodies or public officials.

Responsive items are included in the Appendix.

d. Supply four (4) copies, transcripts or recordings of all speeches or talks delivered by you, including commencement speeches, remarks, lectures, panel discussions, conferences, political speeches, and question-and-answer sessions. Include the date and place where they were delivered, and readily available press reports about the speech or talk. If you do not have a copy of the speech or a transcript or recording of your remarks, give the name and address of the group before whom the speech was given, the date of the speech, and a summary of its subject matter. If you did not speak from a prepared text, furnish a copy of any outline or notes from which you spoke.

Note: I frequently deliver speeches with a few bullet points as notes, quickly discarded after the speech. It is not my habit to keep notes of speeches.

Responsive items are included in the Appendix.

e. List all interviews you have given to newspapers, magazines or other publications, or radio or television stations, providing the dates of these interviews and four (4) copies of the clips or transcripts of these interviews where they are available to you.

Responsive items are included in the Appendix.

f. If applicable, list all published judicial opinions that you have written, including concurrences and dissents. Supply the citations for all published judicial opinions to the Committee.

n/a

13. Public Office, Political Activities and Affiliations:

a. List chronologically any public offices you have held, other than judicial offices, including the terms of service and whether such positions were elected or appointed. If appointed, please include the name of the individual who appointed you. Also, state chronologically any unsuccessful candidacies you have had for elective office or

unsuccessful nominations for appointed office.

- I ran for the California State Assembly as the Republican nominee from San Francisco in 2008.
- I ran for the California State Senate as the Republican nominee from San Francisco in 2012.
- I did not win either of the above races.

b. List all memberships and offices held in and services rendered, whether compensated or not, to any political party or election committee. If you have ever held a position or played a role in a political campaign, identify the particulars of the campaign, including the candidate, dates of the campaign, your title and responsibilities.

President, Dartmouth Students for Jack Kemp, 1988

Volunteer, George H.W. Bush for President, 2004

Volunteer, John McCain for President, 2004

Volunteer, Schwarzenegger for Governor 2006

Volunteer, Mitt Romney for President, 2012

Volunteer, Trump for President 2016

- Co-Chair, Women for Trump
- Co-Chair, Lawyers for Trump
- Media surrogate nationally

Volunteer, Trump for President 2020

- Co-Chair, Women for Trump
- Co-Chair, Lawyers for Trump
- Co-Chair, Indian Americans for Trump
- Co-Chair, Sikhs for Trump
- Media surrogate nationally

Candidate, RNC Chair, December 2022-January 2023

Director, Americans Winning Elections (political action committee) mid-2023-December 2024.

Legal Counsel and volunteer, Trump for President 2024

- Participated as counsel in certain matters including Colorado 14th Amendment case before U.S. Supreme Court
- Volunteer media surrogate
- Women for Trump member

San Francisco Young Republicans, 2004-2008 (approx. as to start)

Nob Hill Republican Women's Club, 2005-2010 and general counsel for part of this time

(approx.; this organization no longer exists).

San Francisco Republican Party, Central Committee member (appointed 2006-2007, elected 2008-2016; Communications Vice-Chair 2008-2010; Chairman, 2010-2014).

California Women's Leadership Association Director 2008-2009.

California Republican Party, Vice Chairman 2013-2016.

Republican National Committee, National Committeewoman from California, 2016-present. At various times roles have included Rules Committee member (2016-present), Co-chair, Western Region (2021-2023), Chair of temporary Election Integrity Committee (2019-2021), Executive Committee (2024-present).

14. Legal Career: Answer each part separately.

a. Describe chronologically your law practice and legal experience after graduation from law school including:

i. whether you served as clerk to a judge, and if so, the name of the judge, the court and the dates of the period you were a clerk;

- As noted above, I served as a law clerk for one year from the fall of 1993 to 1994 for Hon. Paul V. Niemeyer of the federal Fourth Circuit Court of Appeals in Baltimore, Maryland.

ii. whether you practiced alone, and if so, the addresses and dates;

- I handled a few discrete client matters as a solo practitioner in 2004-2005 at 2238 Jones St., San Francisco CA 94109 and early 2006 at 404 E. 66th St., PHB, New York, NY 10065.

iii. the dates, names and addresses of law firms or offices, companies or governmental agencies with which you have been affiliated, and the nature of your affiliation with each.

Center for Individual Rights, summer of 1991. Law Clerk/Summer Associate.

U.S. Department of Justice, Civil Division, Constitutional Torts Section (Bivens), summer of 1992. Law Clerk.

Shearman & Sterling, Summer Associate/Law Clerk in NY litigation department, summer of 1993 prior to clerkship.

Chambers of Hon. Paul V. Niemeyer, 4th Circuit Court of Appeals, Baltimore MD, 1993-1994.

Shearman & Sterling, Litigation Associate in NY, 1994-1998. During this time, seconded by Shearman to Freshfields in London, 1997-1998.

Sidley Austin, Litigation Associate, 1998-2000.

Cooley Godward LLP, Associate, 2000-2002, Palo Alto, CA.

Orrick Herrington & Sutcliffe, Of Counsel, 2003-2004 San Francisco, CA.

American Civil Liberties Union of Northern California, Director 2003-2005 (also chair of the Audit and Election Committees during parts of this tenure).

The Dhillon Law Firm (sole proprietorship) 2004-2005.

Dontzin Law Firm, Associate 2005. Boutique finance/comple litigation firm in Manhattan.

Gibbs & Oliphant, Partner 2006. Boutique small minority-owned law firm in Oakland (no longer exists).

Dhillon Law Group, Partner 2006-present (known as Dhillon & Smith from 2006-2014). Founder and President of 26-attorney firm with 40+ employees nationwide in five physical offices and operating throughout the country.

Center for American Liberty, CEO and Founder, 2019-Present (CAL is a nonprofit civil rights organization that raises funds for and hires counsel for civil rights cases nationally on a low-fee (to the lawyers, no fee to clients) basis).

iv. Whether you served as a mediator or arbitrator in alternative dispute resolution proceedings and, if so, a description of the 10 most significant matters with which you were involved in that capacity.

I trained with and served on the mediation panel for the Northern District of California mediation program for several years. I only handled a small number of matters, and they are confidential.

v. Whether you have held any judicial office, including positions as an administrative law judge, on any U.S. federal, state, tribal, or local court and if so, please provide the name

of the court, the jurisdiction of that court, whether the position was appointed or elected, and the dates of your service.

n/a.

b. Describe:

i. the general character of your law practice and indicate by date when its character has changed over the years.

I started my career in the law during my first two summers of law school handling civil rights litigation. At the Center for Individual Rights, I supported litigation involving the use of “testers” in housing litigation and the use of racial quotas in educational admissions. At the Bivens section in DOJ, I supported litigation defending Constitutional tort claims against federal government agencies. During my clerkship in the 4th Circuit, I took a particular interest in 4th Amendment issues and in gender-based admissions to military academies (VMI and Citadel).

The next decade of my career (1994-2004) was in large international law firms handling a wide variety of commercial litigation, ranging from M&A, banking and telecommunications litigation to complex insurance coverage disputes and art law. In Silicon Valley, I worked on patent, trademark, novel internet tort, and Sarbanes-Oxley matters as well as mass tort defense. Throughout this decade of my career, I handled a substantial amount of pro bono litigation, including numerous asylum cases for political, religious and conscience applicants from India, Tibet, and Eritrea; domestic violence cases, artists’ rights matters, and religious liberty cases.

I transitioned from large law firm practice to small/solo practice, eventually founding my own law firm 18 years ago (originally called Dhillon & Smith LLP, now Dhillon Law Group Inc.). In early years, our clients were small businesses and individuals, including many plaintiffs in Title VII and related state civil rights matters. As the firm grew, our clients included larger companies, venture-funded companies, and individuals suing their employers for discrimination on various bases, including age, gender, race, national origin, pregnancy, and sexual orientation. Our practice grew to include extensive First Amendment litigation, founder disputes, intellectual property disputes, entertainment matters, and novel internet law matters.

Today our clients include President Trump as an individual and his 2024 presidential campaign, various candidates for office at every level, complex antitrust plaintiffs, entertainment figures, high net worth individuals, and senior executives at many public and well-funded private companies alleging discrimination or wrongful termination. At the nonprofit firm I founded, the Center for American Liberty, and law firm The Dhillon Law Group, we also represent plaintiffs in several parental rights litigation and medical malpractice cases involving experimental transgender treatments performed on minors.

ii. Your typical clients and the areas at each period of your legal career, if any, in which you have specialized.

Summarized immediately above.

c. Describe the percentage of your practice that has been in litigation and whether you appeared in court frequently, occasionally, or not at all. If the frequency of your appearances in court varied, describe such variance, providing dates.

90% of my practice has been in litigation, with 10% pre-litigation dispute resolution/counseling.

1. Indicate the percentage of your practice in:

1. federal courts: 75%
2. state courts of record: 25%
3. other courts: 0
4. administrative agencies: 0

11. Indicate the percentage of your practice in:

1. civil proceedings: 99%
2. criminal proceedings: 1%

d. State the number of cases in courts of record, including cases before administrative law judges, you tried to verdict, judgment or final decision (rather than settled), indicating whether you were sole counsel, chief counsel, or associate counsel.

Sole counsel: 2

Chief Counsel: 8

Associate counsel: 2

L. What percentage of these trials were:

1. jury: 25%
2. non-jury: 75%

e. Describe your practice, if any, before the Supreme Court of the United States. Supply four (4) copies of any briefs, amicus or otherwise, and, if applicable, any oral argument transcripts before the Supreme Court in connection with your practice.

I have submitted various briefs to the Supreme Court, both as a private attorney and through my nonprofit, the Center for American Liberty. I have not argued before the court. Solely focusing on cases where my name appears on the brief, these include several cases I litigated in lower courts that were appealed to the Supreme Court.

Date Filed	Case	Case Title	Party	Docs Available	Counsel of Record?
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	Number				
November 24, 2020	20A136; 20-746	<i>South Bay United Pentecostal Church, et al v. Newsom, et al</i>	Petitioner	Petition for Writ of Certiorari Reply in Support of Emergency Application for Writ of Injunction Reply in Support of Petition for Writ of Certiorari	Charles S. LiMandri, LiMandri & Jonna LLP
January 7, 2021	20A120	<i>Gish, et al v. Newsom, et al</i>	Applicant	Application for Writ of Injunction Relief Reply in Support of Application for Writ of Injunction Notice of Status of Church Discrimination in California	Ron Coleman
March 8, 2021	20-1066	<i>Hoggard v. Rhodes, et al</i>	Center for American Liberty	Amicus Brief	Mark Meuser
June 20, 2021	20-843	<i>New York State Rifle & Pistol Association, et al v. Bruen, et al</i>	National Foundation for Gun Rights and National Association for Gun Rights	Amicus Brief	Warrington
December 21, 2021	21A260	<i>Bentkey Services, LLC dba The Daily Wire v. OSHA, et al</i>	Applicant	Emergency Application for Stay Pending Judicial Review, or, alternatively, Petition for a Writ of Certiorari	HKD
January 18, 2022	21-248	<i>Berger, et al v. North Carolina State Conference of the NAACP et al</i>	Republican National Committee	Amicus Brief	Warrington
May 2, 2022	21-1086; 21-1087	<i>Merrill, et al v. Mulligan, et al</i>	Republican National Committee	Amicus Brief	Benjamin I. Mehr
September 13, 2022	22-250	<i>Brach, et al v. Newsom, et al</i>	Petitioner	Petition for Writ of Certiorari Reply in Support of Petition for Writ of Certiorari	HKD
May 17, 2023	22-1135	<i>Center Medical Progress, et al v. National Abortion Federation</i>	Petitioner	Petition for Writ of Certiorari	Jeffrey M. Harris, Consovoy
May 30, 2023	22-1168	<i>Center Medical Progress, et al v. Planned Parenthood Federation of America, et</i>	Petitioner	Petition for Writ of Certiorari Reply Brief for Petitioners	Jeffrey M. Harris, Consovoy

		<i>al</i>			
June 8, 2023	22-1199	<i>O'Handley v. Weber</i>	Petitioner	Petition for Writ of Certiorari Reply in Support of Petition for Writ of Certiorari	Taylor A.R. Meehan
January 3, 2024	23-719	<i>Trump v. Anderson, et al.</i>	Petitioner	Petition for Writ of Certiorari Brief for the Petitioner Reply in Support of Petition for Writ of Certiorari	Warrington
January 23, 2024	22-555	<i>NetChoice v. Paxton</i> [consolidated with <i>Moody</i>]	Center for American Liberty	Amicus Brief	Randall W. Miller,
January 23, 2024	22-277	<i>Moody v. NetChoice</i> [consolidated with <i>NetChoice</i>]	Center for American Liberty	Amicus Brief	Munsch Hardt Kopf & Harr
February 8, 2024	23-411	<i>Murthy, et al v. Missouri, et al</i>	Center for American Liberty	Amicus Brief	HKD
May 24, 2024	23-1155	<i>Villarreal v. Alaniz</i>	Center for American Liberty	Amicus Brief	John Reeves, Reeves Law
August 14, 2024	24A164	<i>Republican National Committee, et al v. Mi Familia Vota, et al</i>	Republican Party of Arizona	Amicus Brief	HKD
September 4, 2024	23-975	<i>Seven County Infrastructure Coalition v. Eagle County, Colorado</i>	Center for American Liberty	Amicus Brief	HKD

15. Litigation: Describe the ten (10) most significant litigated matters which you personally handled, whether or not you were the attorney of record. Give the citations, if the cases were reported, and the docket number and date if unreported. Give a capsule summary of the substance of each case. Identify the party or parties whom you represented; describe in detail the nature of your participation in the litigation and the final disposition of the case. Also state as to each case:

- a. the date of representation;
- b. the name of the court and the name of the judge or judges before whom the case was litigated; and
- c. the individual name, addresses, and telephone numbers of co-counsel and of principal counsel for each of the other parties.

A. *Gish v. Newsom* (US Supreme Court Case No. 20A120):

- **Represented Parties:** Dhillon Law Group and the Center for American Liberty represented Wendy Gish and other individuals representing congregations from three Southern California churches—Shield of Faith Family Church, Church Unlimited, and Word of Life Ministries International, Inc.

- **Capsule summary:** *Gish v. Newsom* primarily centered around issues of religious liberty during the early stages of the COVID-19 pandemic. Our clients, the plaintiffs, challenged executive orders issued by California Governor Gavin Newsom, which restricted in-person religious gatherings as part of the state's response to COVID.
 - The plaintiffs argued that these restrictions violated their First Amendment rights, specifically the Free Exercise Clause, the Establishment Clause, and the right to freedom of assembly. They contended that the orders were not narrowly tailored to serve a compelling governmental interest and that they treated religious gatherings more harshly compared to some secular businesses which were allowed to operate under certain conditions.
 - The defendants, including Governor Gavin Newsom and other state officials, defended these restrictions as necessary public health measures to curb the spread of the virus, arguing that they applied equally to all large gatherings and were not discriminatory against religion.
- **Procedural Posture:** The district court initially dismissed the case with prejudice on December 14, 2020, but this was appealed. The case was appealed to the Ninth Circuit Court of Appeals, where it was consolidated with other similar appeals, notably *South Bay United Pentecostal Church v. Newsom*. It was further appealed to the Supreme Court of the United States.
- **Final Disposition:** The Supreme Court granted an application for injunctive relief and remanded the case back to the district court for further consideration. The Defendants later settled the case.
- **Role in Litigation:** I handled this case actively at every stage. I corresponded with and interviewed the plaintiffs, argued the motion for a temporary restraining order and preliminary injunction, drafted and edited briefs, including to the 9th Circuit and the U.S. Supreme Court. I headed a team of lawyers and paralegals. The most notable colleagues on the case at my firm were Mark Meuser and Gregory Michael.
- **Date of Representation:** Complaint filed 04/13/2020; SCOTUS issued ruling in favor of client (grant, vacate, remand) on March 12, 2021. The case terminated as of April 3, 2023 upon stipulation of the parties.
- **Name of Court:** The underlying matter was filed in the United States District Court, Central District of California on April 13, 2020. An appeal was heard by the Ninth Circuit and the Supreme Court of the United States.
 - **Trial Judge:** Jesus G. Bernal, District Judge
 - **Ninth Circuit panel:** Judge Kim Wardlaw, Judge Richard Clifton, Judge Timothy Hillman
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B. *Tandon v. Newsom:*

- **Represented Parties:** The Center for American Liberty retained outside counsel to represent Ritesh Tandon and the other plaintiffs. Neither my firm nor Center for American Liberties formally represented them.
- **Capsule Summary:** The case was brought by Ritesh Tandon, a candidate for Congress seeking to be able to campaign more effectively than allowed by California COVID regulations, and several other California residents, including a group who wished to regularly gather for home Bible studies and prayer meetings, as they had done before COVID. They argued that the state's restrictions on home gatherings, which were part of broader efforts to control the spread of COVID-19, violated their rights to the free exercise of religion. There were other arguments related to other groups of plaintiffs.
 - The defendant was California Governor Gavin Newsom, along with other state officials, who had issued executive orders limiting gatherings, including those for religious activities, to prevent the spread of the virus
 - The core of the lawsuit was whether California's restrictions discriminated against religious activities by treating them more harshly than comparable secular activities. The plaintiffs argued that while their home Bible studies were limited, other in-home activities, like hair salons or fitness classes, were allowed under certain conditions.
 - Equal Treatment: The argument was that if the state allowed any in-home gatherings, religious gatherings should be allowed under the same or similar restrictions, unless the state could prove the restriction was narrowly tailored to serve a compelling state interest.
- **Procedural Posture:** Initially, the district court denied the plaintiffs' request for a preliminary injunction, and this decision was upheld by the Ninth Circuit Court of Appeals, which found that the state's restrictions were justified under public health concerns.
 - The case was then appealed to the U.S. Supreme Court. In a *per curiam* (unsigned) opinion issued on April 9, 2021, the Supreme Court granted an application for injunctive relief, effectively reversing the lower courts' decisions. The Court held that California's restrictions on at-home religious gatherings must be subject to strict scrutiny, meaning the state had to show that the restrictions were the least restrictive means of achieving a compelling government interest.
 - **Court's Reasoning:** The Supreme Court criticized the state's approach for not treating religious gatherings the same as secular gatherings where similar risks of transmission were present. The Court noted that if the state allowed exceptions for other activities, it should also accommodate religious practices unless the state could prove otherwise under strict scrutiny.
- **Legal Precedent:** This case set a significant precedent for how states could regulate religious gatherings during public health emergencies. It emphasized that states must apply any restrictions on religious activities in a manner that is neutral and generally applicable to both religious and secular activities. It is one of the most significant
- **Role in litigation:** My role in this case was mainly at the outset and in the background. I initially helped identify and work with all the plaintiffs, together with Mark Meuser at my firm and colleagues at the Center for American Liberty. We vetted the legal theories, selected outside counsel to handle the case day to day, and also raised all funds to pay the plaintiffs' counsel at Eimer Stahl. I did not appear on the papers, as I was handling over 20 other COVID lawsuits in federal courts, but I did review briefs, manage fundraising for the case, and facilitate client communication with outside counsel.

- **Date of Representation:** Complaint filed on 10/13/2020; SCOTUS granted application for injunctive relief on 04/02/2021. The case was terminated in July, 2021 following award of attorney fees at trial court level.
- **Name of Court:** The underlying matter was filed in the United States District Court, Central District of California on October 13, 2020. An appeal was heard by the Ninth Circuit and the Supreme Court of the United States.
 - **Trial Judge:** Assigned to Judge Lucy Koh; Referred to Judge Virginia DeMarchi
 - **Ninth Circuit panel:** Judge Milan D. Smith; Judge Bridget S. Bade; Judge Patrick J. Bumatay.
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C. *South Bay United Pentecostal Church v. Newsom*

- **Represented Parties:** Plaintiff South Bay United Pentecostal Church
- **Capsule summary:** The plaintiff church sought to continue in-person worship services despite state-imposed restrictions. Governor Gavin Newsom, through executive orders, limited religious gatherings while allowing various “essential” activities to proceed without such restrictions. The case dealt with issues concerning free exercise of religion and equal treatment.
- **Procedural Posture:** The United States District Court for the Southern District of California initially denied the Church’s request for a preliminary injunction. The Ninth Circuit affirmed the district court’s decision reasoning were justified under public health concerns.
- **Final Disposition:** In the first review for May 2020, the U.S. Supreme Court declined to grant an injunction pending appeal in an unsigned order, allowing the state’s restrictions to continue. However, Justices Alito, Thomas, and Kavanaugh dissented, indicating concerns over the restrictions’ impact on religious freedom. In the second review in November 2020, after the state modified its rules but placed limits on religious gatherings, the Supreme Court revisited the case. This time, in a 5-4 decision, the Court issued a per curiam opinion granting an injunction against the state’s restrictions. Chief Justice Roberts, who had previously voted to uphold the restrictions, now voted with the majority. The Court held that the state’s restrictions must be subject to strict scrutiny, meaning they must be narrowly tailored to serve a compelling government interest.
- **Legal Precedent & Implications:** This case set an important precedent for how religious gatherings could be regulated during public health emergencies. It underscored that states must apply restrictions in a neutral and generally applicable manner or justify under strict scrutiny why religious activities are treated differently. The ruling influenced numerous similar cases nationwide, leading to a reevaluation of many state and local regulations on religious gatherings during the ongoing health crisis.
- **Role in Litigation:** I played an active role in this matter as co-counsel with LiMandri & Jonna lawyers. We talked daily and shared drafts of briefs and edited each other’s work. We helped moot court each other’s arguments in COVID religion cases for the 9th Circuit arguments, which happened one after the other as the cases were consolidated for appeal.
- **Date of Representation:** May 2020 - 2021
- **Name of Court:** United States District Court for the Southern District of California (Case No. 3:20-cv-00865); Ninth Circuit (Case No. 20-55533); Supreme Court of the United States (Case No. 20-A136 (20-746))
 - **Trial Judge:** Assigned to Judge Cynthia Bashant; Referred to Judge Allison Goddard
 - **Ninth Circuit panel:** Judge Kim McLane Wardlaw, Judge Richard R. Clifton, and Judge Timothy Hillman.
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D. *Konen v. Caldeira:*

Konen v. Caldeira was a lawsuit involving a parent, Jessica Konen, and her daughter, challenging actions taken by teachers and the Spreckels Union School District in California.

- Plaintiffs: Jessica Konen and her minor daughter, referred to as “A.G.” in the lawsuit, were the plaintiffs. The lawsuit was brought against the Spreckels Union School District, including specific educators Lori Caldeira and Kelly Baraki from Buena Vista Middle School in Salinas, California.
- Defendants: The defendants included the school district, teachers Caldeira and Baraki, and the school’s principal, Katelyn Pagan.

- The case, filed in 2022, alleged that the school district and teachers allegedly facilitated or encouraged A.G.'s social transition to a different gender identity without informing or getting consent from Konen, the parent. This included using a different name and pronouns for A.G. at school, which was kept secret from her mother.
 - Parental Notification: The lawsuit challenged the school's "Parental Secrecy Policy" whereby staff were instructed to conceal from parents information about their children expressing or exploring gender identity changes unless the student explicitly allowed parental notification.
 - Legal Claims: The complaint asserted several claims, including:
 - Violation of parental due process rights under 42 U.S.C. § 1983, arguing that parents have a fundamental right to direct the upbringing of their children.
 - Conspiracy to violate civil rights under 42 U.S.C. § 1985(3).
 - Intentional infliction of emotional distress.
 - Negligence and negligence per se.
 - Violation of the Bane Act (California Civil Code § 52.1), which protects against interference with civil rights by threats, intimidation, or coercion.
 - Civil conspiracy.
 - Procedural: The lawsuit was initially filed in January 2022, following public attention after a leaked audio recording where teachers Caldeira and Baraki discussed tactics for running a Gay-Straight Alliance (GSA) in conservative/rural communities, including how to recruit students into these clubs without parental knowledge.
 - Settlement: The case ended with a settlement agreement on June 22, 2023 where the plaintiffs received a total of \$100,000.
 - Public and Policy Debate: This case fueled national discussions on school policies regarding gender identity, the role of educators in students' identity exploration, and the rights of parents to be informed about significant changes in their children's school life.
 - My role included initial communications with the plaintiffs after Ms. Konen spoke publicly about the matter, reviewing and editing pleadings and briefs, directing legal strategy, raising funds for the litigation, and media advocacy.
-
- **Date of Representation:** Complaint filed on June 14, 2022; Case settled on 06/22/2023
 - **Name of Court:** Filed in the Superior Court of California County of Monterey.
 - **Trial Judges:** Judge Beth Freeman; Assigned to Judge Edward Davila; Referred to Judge Virginia Demarchi
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E. *Young America's Foundation v. Napolitano:*

Young America's Foundation v. Napolitano concerned free speech rights on college campuses, specifically at the University of California, Berkeley (UC Berkeley).

- Plaintiffs: The plaintiffs were Young America's Foundation (YAF), a conservative youth organization, and the Berkeley College Republicans (BCR), a student group at UC Berkeley. They filed the lawsuit against UC Berkeley's administration.
- Defendant: Janet Napolitano, then President of the University of California system, was named as the defendant in her official capacity.

Capsule Summary:

- Free Speech and Campus Policy: The case centered on allegations that UC Berkeley was restricting free speech, particularly for conservative speakers, through its policies and actions. After violent protests disrupted a conservative speaking event in which the Berkeley College Republicans had sought to host Milo Yiannopoulos, UC Berkeley implemented new policies that the plaintiffs argued unfairly targeted conservative groups.
- Specific Policies:
 - High-Profile Speaker Policy: An unwritten policy that allegedly restricted the time, place, and manner of events involving “high-profile” speakers, which disproportionately affected conservative groups.
 - Security Fees: The plaintiffs claimed they were charged security fees for hosting controversial speakers including Ann Coulter and David Horowitz, which they argued was not equally applied to all groups or speakers.
- First Amendment Violations: YAF, which funded the speakers affected by the challenged policies, and BCR argued that these policies violated their First Amendment rights by:
 - Applying speech restrictions in a discriminatory manner.
 - Allowing a “heckler’s veto” where the fear of potential disruption by protesters effectively silenced speech.
 - Imposing burdensome security fees that acted as a deterrent for hosting certain speakers.
- Filing: The lawsuit was filed in April 2017 in the U.S. District Court for the Northern District of California.
- Motion to Dismiss: The defendants moved to dismiss the complaint, arguing that the policies were content-neutral and necessary due to security concerns.
- Court Decisions:
 - Partial Dismissal: In May 2018, Judge Maxine M. Chesney partially granted the defendants’ motion to dismiss. She dismissed claims related to the security fees but allowed other claims to proceed, particularly those concerning the High-Profile Speaker Policy and allegations of viewpoint discrimination.
 - Settlement: Ultimately, the case was settled in January 2018 after a judicial settlement conference. Under the settlement agreement, UC Berkeley agreed to:
 - Stop charging security fees for speakers invited by student groups.
 - Provide clearer guidelines for event planning that would ensure equal treatment of all speakers, regardless of viewpoint.
 - Implement training for certain administrators on First Amendment rights.
- The case highlighted critical issues about free speech on college campuses and how universities manage security and event planning without infringing on constitutional rights.
- The case was viewed as so significant on First Amendment issues that the Civil Rights Division of the U.S. Department of Justice filed a statement of interest in the case, supporting free speech and the claims made by the plaintiffs.
- Public and Policy Debate: The case sparked national discussions on the balance between free speech and campus safety, the role of universities in maintaining open discourse, and the rights of student groups to host speakers of all political persuasions. The settlement was seen as a victory by free speech advocates, reinforcing the notion that universities should not use security concerns as a pretext to limit speech. This case has been frequently cited in discussions and legal actions concerning free speech rights in educational settings.

- My role in this case was lead counsel at every stage, from intaking the matter to drafting the demand letter, response letter, and lawsuit with Krista Baughman and Gregory Michael at the Dhillon Law Group, drafting and editing briefs, arguing the motions in court, leading the settlement discussions at the judicial settlement conference, and helping to monitor compliance after the settlement.
- **Date of Representation:** Complaint filed on 04/24/2017; Notice of conditional settlement entered on 12/03/2018.
- **Name of Court:** US District Court for the Northern District of California, San Francisco Division
 - **Trial Judge:** Hon. Maxine Chesney
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F. *Chloe Brockman a/k/a Chole Cole v. Kaiser Foundation Hospitals:*

Chloe Brockman v. Kaiser Foundation Hospitals, Inc. is an ongoing lawsuit filed by Chloe Brockman, also known as Chloe Cole, against Kaiser Foundation Hospitals, Inc., and other related defendants.

Background:

- Plaintiff: Chloe Brockman, who is also known publicly as Chloe Cole, a detransitioner and advocate against gender transition medical procedures and drug therapy for minors.

- Defendants: The defendants include Kaiser Foundation Hospitals, Inc., The Permanente Medical Group, Inc., and several individual medical professionals associated with these organizations, such as Lisa Kristine Taylor, M.D., Hop Nguyen Le, M.D., and Susanne E. Watson, Ph.D.

Key Issues:

- Medical Malpractice: The lawsuit alleges medical negligence and fraud, claiming that when Brockman was a minor, she was coerced into undergoing transgender hormone therapy and a double mastectomy (top surgery) without proper informed consent. It asserts that her psychological issues, including gender dysphoria, were mishandled, leading to irreversible physical and psychological damage.
- Consent and Informed Decision: The complaint argues that Brockman and her parents were not adequately informed about the risks, alternative treatments, or the potential for regret post-transition. It also claims that the defendants promoted hormone treatments and surgery as the only viable solution, ignoring less invasive psychological or psychiatric interventions.
- Fraudulent Misrepresentation: Brockman's legal team alleges that the medical professionals falsely informed her and her family that she was at a high risk for suicide if she did not transition, using this as leverage to push for medical transition.

Legal Journey:

- Filing: The lawsuit was filed on February 22, 2023, in the San Joaquin County Superior Court in California.
- Court Actions:
 - Motion for Arbitration: Kaiser attempted to move the case into arbitration, arguing that Brockman's parents had agreed to arbitration through their employment benefits with Kaiser. However, this motion was denied by Judge Robert T. Waters on April 15, 2024, allowing the case to proceed in court, a decision the defendants have appealed, causing the case to be presently stayed while the arbitration issue is decided on appeal.
 - Amended Complaint: In April 2024, Brockman's legal team filed an amended complaint seeking punitive damages, supported by declarations from various medical professionals and others, detailing Brockman's medical history and the psychological assessments she underwent.

Impact and Broader Context:

- Legal and Social Debate: This case has become emblematic of the broader debate over transgender healthcare, particularly for minors. The legal merits of the case focus on the specifics of consent, medical practice, and patient autonomy.
- Publicity: The lawsuit has received significant international attention, and is the first of several medical malpractice lawsuits filed by attorneys on similar facts and issues.
- Future Implications: The outcome of this case could influence how medical consent and practices regarding transgender healthcare are approached, especially concerning minors. It also touches on issues of malpractice, informed consent, and the role of medical providers in managing alleged gender dysphoria.
- **Date of Representation:** Complaint filed 02/22/2023—present

- **Name of Court:** Superior Court of the State of California, County of San Joaquin, Stockton Branch
- **Trial Judge:** Judge Robert Waters
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G. *James Damore et al. v. Google:*

Plaintiff: James Damore was a senior software engineer at Google when he wrote and circulated an internal memo titled “Google’s Ideological Echo Chamber” in July 2017.

Defendant: Google LLC, where Damore was employed until he was fired on August 7, 2017.

Capsule Summary:

- Content of the Memo: In his memo, Damore criticized Google’s diversity efforts in detail, proposing that Google’s approach to diversity was creating an “ideological echo chamber” that discriminated against conservative viewpoints and potentially against certain groups in hiring practices. He was fired for circulating this memo internally.
- Lawsuit Claims:
 - Discrimination: Damore alleged that Google discriminated against white men, particularly those with conservative views, in its hiring and employment practices.
 - Political Viewpoints: He claimed that Google had created a hostile work environment for conservative employees, including through alleged “blacklists” and by punishing employees for expressing conservative political views.
 - Class Action: The lawsuit was initially filed as a class action, aiming to represent other employees similarly situated, including white, male, and conservative individuals.
- Damore, along with another former Google engineer, David Gudeman, filed the lawsuit in January 2018 in the Santa Clara County Superior Court in California.
- Evidence: The lawsuit included numerous screenshots from Google’s internal communications, which Damore claimed demonstrated a bias against conservative viewpoints and certain demographics.
- Court Proceedings:
 - Motion to Dismiss: Google moved to dismiss the lawsuit, but this was partially denied by Judge Brian Walsh in June 2019, allowing certain claims to proceed to discovery.
- Resolution: In May 2020, Damore and the other plaintiffs moved to dismiss the lawsuit entirely, with Google agreeing to the dismissal. The terms of the resolution were not disclosed publicly.
- Public Discourse: The case and the memo sparked a significant public debate over workplace diversity policies, free speech in the workplace, and the role of biological differences in professional representation.
- Corporate Culture: The lawsuit highlighted issues surrounding political ideology in tech companies, leading to discussions about inclusivity versus ideological conformity within corporate environments.
- My role in this case was extensive and hands-on from beginning to end, including numerous meetings with the clients, drafting the complaint, arguing the motion to dismiss, supervising discovery, engaging with various interests, media advocacy, and participating in settlement discussions. I also appeared once before the NLRB to discuss the clients’ complaint that preceded the lawsuit.
- **Date of Representation:** January 2017 - 2020
- **Name of Court:** Superior Court of the State of California, County of Santa Clara
- **Trial Judge:** Hon. Brian Walsh
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H. Cases against Gurbaksh Chahal and Gravity 4

Encarnita Alonso v. Gurbaksh Chahal et al. (Case No. CGC-15-545426) (Employment) (San Francisco Superior Court)

Encarnita Alonso v. Gurbaksh Chahal et al. (Case No. CGC-16-551721) (Defamation) (San Francisco Superior Court)

Yousef Khraibut v. Gurbaksh Chahal et al. (Case No. 3:15-CV-04463) (United States District Court - Northern District of California)

- **Represented Parties:** Encarnita Alonso and Yousef Khraibut.
- **Capsule summary:** These three cases involve claims brought by former employees of Mr. Chahal and/or his company, Gravity4.
 - With respect to Ms. Alonso’s employment case, she alleged that Mr. Chahal and his company engaged in discriminatory employment practices, including but not limited to, discrimination and harassment of female employees. Ms. Alonso also alleged that she was unlawfully terminated after raising concerns about workplace conditions and reported illegal conduct.
 - With respect to Ms. Alonso’s defamation claim, she alleged that Mr. Chahal and Gravity4 caused defamatory statements to be published about her which negatively impacted her reputation and ability to obtain new employment. Ms. Alonso was awarded \$12,102,994.07 by the Court.
 - With respect to Mr. Khraibut’s claims, he alleged that Mr. Chahal and Gravity4 discriminated against and harassed him because of his religion, ethnicity, and/or national origin. He also brought retaliation claims, wage and hour claims, and breach of contract claims. Mr. Khraibut was awarded \$1,35,452.20 by the Court.
- **Final Disposition:**
 - Ms. Alonso was awarded \$4,017,938.38 by the Court for her employment action.
 - Ms. Alonso was awarded \$12,102,994.07 by the Court for her defamation action.

- Mr. Khraibut was awarded \$1,35,452.20 by the Court.
- **Role in Litigation:** I oversaw all aspects of the litigation and managed it over the years. I had an active role in the initial discussions, negotiations, and settlement attempts. I reviewed and edited the final pleadings, and participated in investigations and depositions. I personally deposed the defendant. He has moved offshore and I am presently managing collection efforts with co-counsel for collection, Mark Geragos.
- **Date of Representation:**
 - Encarnita Alonso (employment) – April 21, 2015 (filed), September 9, 2020 (judgment).
 - Encarnita Alonso (defamation) – April 28, 2016 (filed) – April 1, 2021 (judgment).
 - Yousef Khraibut – September 28, 2015 (filed) – March 26, 2021 (judgment).
- **Name of Court:** San Francisco Superior Court and the United States District Court, Northern District of California.
- **Trial Judge:** SF Superior Court – Judge Gerardo C. Sandoval / Northern District – Judge Charles R. Breyer
- **Name contact information of co-counsel and counsel for all parties—**
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 - Patricia L. Glaser (intermediate counsel)
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- Defense counsel at Murphy, Pearson, Bradley & Feeney, P.C.
- James Lassart (final counsel of record)
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San Francisco, CA 94104

I. *Trilochan Singh Oberoi v. Department of Corrections and Rehabilitation Case No. 34-2009-00054595:*

Capsule Summary: In 2009, Oberoi sued the California Department of Corrections and Rehabilitation, highlighting that while the CDCR enforced a no-beard policy for safety reasons, exceptions were made for certain individuals with certain medical conditions, allowing beards up to one inch in length. Oberoi argued that similar accommodations should be extended for religious reasons. Sikh serve in the military and peace forces of most western nations and throughout Asia, including where gas masks are required.

During the pendency of this case, the Civil Rights Division of the US Department of Justice opened an investigation into the CDCR's employment practices, including this issue.

In August 2011, the CDCR agreed to a settlement following substantial national publicity on the case, including a press conference in which a broad coalition of civil rights organizations, ranging from the ACLU to the Asian Law Caucus and the Becket Fund joined in demanding fair employment for Mr. Oberoi. The settlement terms included a payment of \$295,000 to Oberoi and his appointment to a managerial position within the department's Regulation and Policy Management Branch, with an annual salary of approximately \$61,000.

I actively handled this case from start to finish, including interacting with and retaining the client, who had been referred by the Sikh Coalition, funding the case including substantial discovery expenses for nearly four years, researching and arguing novel legal theories and obtaining evidence from other jurisdictions about gas mask adaptations and uses by bearded law enforcement officers, arguing the motion to dismiss, preparing the summary judgment motion and opposition, responding to media requests, organizing national awareness of the case and building a coalition of over 20 civil rights organizations that joined me in demanding that Attorney General Harris resolve this matter, and negotiating the settlement.

- **Date of Representation:** The court case was active in court from approximately July 31, 2009 to October 12, 2011, preceded by two years of administrative action including a merits trial.
- **Name of Court:** Superior Court of California for the County of Sacramento
- **Trial Judges:** Hon. Shelleyanne W.L. Chang; Hon. Michael G. Virga
- **Name contact information of co-counsel and counsel for all parties—**
- Plaintiff co-counsel from Dhillon & Smith (now Dhillon Law Group)
- Krista Shoquist (Baughman)
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- Defendant counsel from California AG's Office
- Kamala Harris
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- Barbara Seidman
- Susan Slager

**J. *Planned Parenthood Federation of America, Inc. et al. v. Center for Medical Progress et al.*
Case No. 3:16-cv-00236 (N.D. CA 2016):**

Clients: Center for Medical Progress and David Daleiden

Capsule Summary: Planned Parenthood and National Abortion Federation alleged that the Center for Medical Progress and its associates engaged in unlawful activities, including fraud, RICO, and secret recordings, during their undercover operations targeting Planned Parenthood's practices of selling body parts of aborted fetuses.

After a jury trial spanning six weeks against multiple defendants, the jury found for the plaintiffs on most claims. The case was appealed to the 9th Circuit, which upheld the verdict, and the Supreme Court denied cert.

My role in this case was an active trial role. I joined the trial team in the months leading up to trial and helped prepare it for trial. I made opening statements and closing arguments for David Daleidin and Center for Medical Progress, handled witnesses, in limine arguments, cross examination, jury selection, and in camera legal arguments as well as proposing and arguing jury instructions. I also managed the trial demonstrative and exhibits teams with my associate, Dorothy Yamamoto.

- **Date of Representation:** January 14, 2016 (Filed) – November 15, 2019 (Jury Verdict); appeals continued through 2024.
- **Name of Court:** United States District Court, Northern District of California.
- **Trial Judges:** Assigned to Hon. William H. Orrick III; Referred to Hon. Donna Ryu
- **Name contact information of co-counsel and counsel for all parties—**
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Oakland, CA 94607
- Michael Robert Goldstein
- Charles Furlonge Robinson
- Margaret Louisa Wu

16. **Legal Activities:** Describe the most significant legal activities you have pursued including significant litigation which did not progress to trial or legal matters that did not involve litigation. Describe fully the nature of your participation in these activities. List any client(s) or organization(s) for whom you performed lobbying activities and describe the lobbying activities you performed on behalf of such client(s) or organizations(s). (Note: As

to any facts requested in this question, please omit any information protected by the attorney-client privilege.)

A. Settled Private Discrimination Claims. During my career, especially in the last 18 years since founding my current law firm, I have successfully handled numerous plaintiff discrimination cases that were privately resolved before litigation was filed, resulting in tens of millions of dollars of settlements for victims of sexual harassment, sexual assault, gender discrimination, racial bias, national origin discrimination, age discrimination, sexual orientation discrimination, national origin discrimination, and disability discrimination. Through our advocacy, we have been able to provide substantial compensation for our clients while maintaining their privacy, dignity, and reputations. I have been the lead lawyer in these cases, with the assistance of partners and associates. Sometimes these cases take years of pre-litigation discovery and multiple mediations or settlement discussions to resolve.

B. *Hu et al. v. Plehn-Dujowich*, 3:18-cv-01791 (N.D. CA 2018) is a class action lawsuit my firm filed on behalf of three named plaintiffs and a class of hundreds of foreign students who sued a U.C. Berkeley and UCLA business school professor, Jose Plehn-Dujowich, for selling them a counterfeit University of California online business course credential while really exploiting them as unpaid labor for his private consulting business. As part of a stipulated summary judgment before Judge Donato, the class was certified and the case settled for reimbursement to the students of the thousands of dollars each of them paid, plus fees and costs. The defendant began paying but defaulted, and our firm has continued to pursue justice and payment for the students for many years and continue to do so.

**C. *Givens v. Newsom*, Case No. 2:20-cv-00852-JAM-CKD (District Court)
Case No. 20-15949 (Court of Appeals, Ninth Circuit)**

Ron Givens and Christine Bish sued Gavin Newsom in his official capacity as the Governor of California. The case was filed in 2020, and upon denial of the injunction and dismissal, the case was appealed to the United States Court of Appeals for the Ninth Circuit with the case number 20-15949, decided on December 4, 2020.

- Summary: The plaintiffs sought a temporary restraining order (TRO) to enjoin (stop) the enforcement of public health directives that restricted gatherings, which they argued infringed upon their rights. Specifically, Givens wanted to protest restrictions on issuance of firearms licenses during the pandemic and Bish, a congressional candidate, wanted to hold rallies, both of which were restricted under the state's orders.

During the pendency of this case, the U.S. Department of Justice, Civil Rights Division, filed a statement of interest, siding with the plaintiffs in arguing that the state's restrictions on free speech and assembly violated the First Amendment.

Due to the constantly shifting nature of the state's restrictions, this case was ruled moot by the courts.

- **Name of Court:** U.S. District Court for the Eastern District of California; and U.S. Court of Appeals for the Ninth Circuit (Hons. Jon S. Tigar, Ferdinand F. Fernandez and Richard A. Paez)

- **Trial Judge:** Hon. John A. Mendez
- **Court of Appeals Judges:** Hons. Jon S. Tigar, Ferdinand F. Fernandez and Richard A. Paez
- **Name contact information of co-counsel and counsel for all parties—**
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 - Amie Medley
 - Mark Beckington
 - Thomas Patterson
 - Michael Mongan
 - Xavier Becerra

E. *Hernandez et al. v. City of San Jose et al.*, Case No. 16-CV-03957-LHK

Our clients Juan Hernandez and over a dozen others alleged that the City of San Jose and its Mayor and police department violated the plaintiffs’ constitutional rights during and after a Donald Trump for President rally on June 2, 2016. The lawsuit claimed that police officers intentionally funneled Trump supporters into a canyon of violence, leaving the rally into areas where violent protesters were waiting, resulting in physical attacks, harassment, and verbal abuse. The plaintiffs argued that the police acted with deliberate indifference, failing to intervene or protect them, despite being aware of the danger. They contended this violated their Fourteenth Amendment rights to equal protection and their First Amendment rights to freedom of speech and assembly by deterring their participation in the political event. Additional claims included negligence and gross misconduct by the police department. The plaintiffs sought compensatory and punitive damages for physical and emotional harm, as well as injunctive relief to prevent similar incidents at future events. This case underscored concerns about public safety, law enforcement responsibilities, and the protection of constitutional rights during politically charged gatherings.

I handled this case from beginning to end, including interviewing witnesses, drafting the complaint, negotiating with opposing counsel, arguing the motion to dismiss before Judge Koh, and arguing the qualified immunity appeal before the 9th Circuit. My colleagues from my firm assisting on the case were partner Krista Baughman and associate Gregory Michael (now at Michael Yamamoto).

a. The case was filed on or about July 14, 2016. On or about July 27, 2018, the U.S. Court of Appeals for the Ninth Circuit issued a decision affirming the district court's denial of qualified immunity to the officers, in a ruling that collected and explained circuit law on the state-created danger exception to qualified immunity.

b. The case was settled in April, 2020 after magistrate settlement conference in a settlement that required the city to change its policies in dealing with crowd situations and to require additional training for officers deployed to such events.

b. U.S. District Court for the Northern District of California (Hon. Lucy Koh)
U.S. Court of Appeals for the Ninth Circuit (Hons. A. Wallace Tashima, William A. Fletcher, Richard A. Paez)

- o Richard Doyle (deceased)
Matthew Pritchard
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F. *Bentkey Services, LLC, dba The Daily Wire v. OSHA, et al.*

Case No. 21A260 (2021)

Client: The Daily Wire

In November 2021, the Daily Wire, a media and entertainment entity, filed a constitutional lawsuit challenging the Biden administration's vaccine mandate for private employers with 100 or more employees. This mandate, issued by the Occupational Safety and Health Administration (OSHA), required employees to be vaccinated against COVID-19 or undergo weekly testing and wear masks at work. The Daily Wire's legal challenge argued that the federal government lacked the authority to impose such a mandate on private employers and that the mandate was unconstitutional. The case progressed through the federal courts and was eventually considered by the Supreme Court in consolidation with other, similar challenges. In January 2022, the Supreme Court issued a ruling that blocked the enforcement of the OSHA vaccine-or-test mandate for large employers, stating that OSHA had exceeded its authority. This decision effectively nullified the mandate, aligning with the Daily Wire's position against the federal government's overreach in imposing vaccination requirements on private businesses.

a. The case was filed in or around December of 2021 and appealed to the U.S. Supreme Court along with other such cases around the country. The Supreme Court ruled on a benchmark case in the group of cases or about January 13, 2022, holding 6-3 that OSHA had

exceeded its statutory authority. The justices noted that OSHA had never before imposed such a mandate, and Congress had not enacted any similar measure. The Supreme Court emphasized that while OSHA has the power to regulate occupational dangers, this mandate was seen as an overreach into broader public health regulation, which was not within OSHA's jurisdiction

b. I played an active role throughout this case, managing the client relationship, complaint drafting, briefing, discussions with co-counsel at ADF, and media advocacy concerning the case.

c. Supreme Court of the United States (Chief Justice John Roberts and Justices Clarence Thomas, Stephen Breyer, Samuel Alito, Sonia Sotomayor, Elena Kagan, Neil Gorsuch, Brett Kavanaugh, and Amy Coney Barrett)

d. Defense counsel: Elizabeth B. Prelogar
Solicitor General
United States Department of Justice

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G. *Trump v. Anderson*

This is one of over 100 cases brought in the US in 2023 and 2024 making 14th Amendment challenges to President Donald J. Trump's eligibility to run for President in 2024. *Trump v. Anderson* was brought in Colorado, and after a trial and appeal in state court it was appealed by President Trump to the U.S. Supreme Court. In a unanimous *per curiam* ruling, the Supreme Court held in an opinion based on federalism principles, that States cannot enforce Section 3 of the Fourteenth Amendment against federal officeholders or candidates. This power lies solely with Congress.

Throughout the country in the related lawsuits, I played an active role in identifying and securing local counsel to work with our law firm in various jurisdictions. My role in the case was also at the Supreme Court level, where I appeared on the briefs with my colleagues, and reviewed and commented upon the briefs internally. Jonathan Mitchell argued the case at the Supreme Court for President Trump.

17. Teaching: What courses have you taught? For each course, state the title, the institution at which you taught the course, the years in which you taught the course, and describe briefly the subject matter of the course and the major topics taught. If you have a syllabus of each course, provide four (4) copies to the committee.

n/a

18. Deferred Income/ Future Benefits: List the sources, amounts and dates of all anticipated receipts from deferred income arrangements, stock, options, uncompleted

contracts and other future benefits which you expect to derive from previous business relationships, professional services, firm memberships, former employers, clients or customers. Describe the arrangements you have made to be compensated in the future for any financial or business interest.

I am entitled to a share of fees in a concluded litigation matter in the amount of up to approximately four million dollars. The exact amount is unknown and pending international collection efforts being conducted by my co-counsel.

I am entitled to a share of the fees in pending contingent litigation matters also in the amount of potentially several million dollars, amounts to be determined upon conclusion of the cases.

I am in the process of negotiating an agreement with my law firm successor owner over the disposition of these funds to which I am entitled. I will also be entitled to my profit share of fees collected and paid on matters originated before I leave the firm, also being negotiated. These may amount to several hundred thousand dollars.

19. Outside Commitments During Service: Do you have any plans, commitments, or agreements to pursue outside employment, with or without compensation, during your service? If so, explain.

No.

20. Sources of Income: List sources and amounts of all income received during the calendar year preceding your nomination and for the current calendar year, including all salaries, fees, dividends, interest, gifts, rents, royalties, licensing fees, honoraria, and other items exceeding \$500 or more (if you prefer to do so, copies of the financial disclosure report, required by the Ethics in Government Act of 1978, may be substituted here).

- See Attached Form OGE-287.

21. Statement of Net Worth: Please complete the attached financial net worth statement in detail (add schedules as called for).

22. Potential Conflicts of Interest:

- a. Identify the family members or other persons, parties, affiliations, pending and categories of litigation, financial arrangements or other factors that are likely to present potential conflicts-of-interest when you first assume the position to which you have been nominated. Explain how you would address any such conflict if it were to arise.

I do not believe any family members of mine are likely to have relevant legal matters that might pose any conflict of interest. This said, it is possible that my current law firm, which I plan to sell to my brother (who is currently a partner in the firm) and the nonprofit Center for American Liberty, could have legal matters that come to the attention of the Civil Rights Division.

- b. Explain how you will resolve any potential conflict of interest, including the procedure you will follow in determining these areas of concern.

In any matter likely to pose a conflict of interest, I would flag the matter for my supervisors in the Department, and follow their guidance, which might include recusal, an ethical wall, or other ethical screen/separation.

- 23. Pro Bono Work:** An ethical consideration under Canon 2 of the American Bar Association's Code of Professional Responsibility calls for "every lawyer, regardless of professional prominence or professional work load, to find some time to participate in serving the disadvantaged." Describe what you have done to fulfill these responsibilities, listing specific instances and the amount of time devoted to each. If you are not an attorney, please use this opportunity to report significant charitable and volunteer work you may have done.

Throughout my career, I have devoted a substantial portion of my time (10-25% or more, so hundreds of hours a year) to pro bono work, including as a senior partner in supervising other attorneys' work and encouraging every attorney at my law firm to perform public service through pro bono work. During 2020-2021, the vast majority of my law firm's legal work involved representing citizens whose civil rights were impacted by COVID emergency orders, without any charge to the clients. Through the nonprofit I founded, the Center for American Liberty, I have raised over \$15 million to fund pro bono legal services. I have served on the boards of several nonprofits, and I have personally handled several court-sponsored panel pro bono legal matters.

A. Domestic Violence Advocacy I started my domestic violence advocacy by training as a state-certified domestic violence advocate during law school, which required 40 hours of training. I began handling calls and giving advice after that. During my time at Shearman & Sterling I volunteered for a complex domestic violence case involving a Muslim woman who claimed abuse by her husband, who also refused to divorce her. Through my advocacy, I was able to obtain a divorce for her. I also have volunteered for domestic violence matters for several women in the San Francisco Bay Area. My work in this regard led me to serve on the board of a domestic violence nonprofit and shelter for several years, the Support Network for Battered Women, alongside a prosecutor, city attorney, and other legal volunteers.

B. Numerous Asylum Cases My first trial as an attorney was for an asylum seeker from Kashmir, India, in exclusion proceedings during my early years at Shearman & Sterling. This was a complex case involving torture, extrajudicial killing of family members, and "disappearing" the brother of the claimant. I obtained expert testimony from physicians at NYU and collected evidence from the home country. At trial, which I handled solo, I was able to prove my client's case and win his asylum and get him on his way to a new life in the US. I personally escorted my client from the detention facility to the airport where I bought him a plane ticket to fly to Florida to stay with his deceased mother's brother. He has built a family and life in Florida, where he still lives.

Other asylum cases I led at both Sidley Austin and Cooley Godward, included victims of religious discrimination from Tibet and Eritrea.

C. Four Victims of Sex Trafficking in Infamous Lakireddy Bali Reddy Case. While at Cooley Godward, in 2001 I led a group of women attorneys who helped four victims of Berkeley landlord and restaurateur Lakireddy Bali Reddy, who was accused of bringing dozens of poor young women from India to work as sex slaves for his immediate family and unpaid labor for his large landlord business. I volunteered for this case that came through Maitri, a South Asian domestic violence shelter and organization for which I was a panel volunteer. Some of these women had been witnesses in the criminal case against Reddy. We applied for sex trafficking visas for these women and had to prove up their case. We overcame hurdles including interpreter difficulty (Reddy was known to threaten the families of his victims back in Andhra Pradesh, India, and many area people from the subcontinent, including interpreters, were leery of getting involved.) The cases ended successfully with the victims being granted visas. Some of them went on to sue the Reddy family in civil court. As the names of most of them are not public, I will not name them here.

D. Judicial Panel Work. I have handled several matters as a volunteer pro bono attorney for the Northern District of California court referral program, and one for the 9th Circuit program. My cases included one case for the parents of a troubled young man who committed suicide while in custody for a drug offense, allegedly not properly supervised or given medical treatment after expressing suicidal ideation. We obtained compensation for the family. One 9th Circuit case involved a prisoner's rights case claiming substantive due process in denying him the right to take his legal papers with him to a court proceeding over dental malpractice. I did not prevail in that case, but it required substantial preparation and time, including oral argument.

E. *United States v. Pablo Fernandez*, Docket 96-1023 (2d Cir. 1997). In this matter, I worked closely on the criminal appeal of a defendant convicted of a single count of conspiracy to distribute narcotics, which was the fruit of an informant's solicitation of the offense. I volunteered as the associate on the matter at Shearman & Sterling, assisting former federal prosecutor Jeremy Epstein, my supervisor in the litigation department. I interviewed the client in prison and then researched and drafted the briefs, where my name appears (I had not yet qualified for admission to the 2d Circuit, so the brief designation is "of counsel."). The arguments included challenging the sufficiency of the evidence and the application of the sentencing guidelines, which were then mandatory and included certain challenged enhancements. The Second Circuit panel upheld the conviction.

F. Appointed Deputy District Attorney in Queens, NY. During my time at Shearman & Sterling in the mid 1990s, I volunteered for an appellate program whereby a private practice attorney could take on the defense of an appeal from a conviction. In my case I defended a traffic stop involving a broken taillight, that had led to the discovery of narcotics on the defendant, who claimed a Fourth Amendment violation. I briefed and defended the appeal before the Appellate Division of the court, and I successfully defended the appeal.

G. Religious Liberty Advocacy Related to 9/11. In the immediate aftermath of 9/11, after many Sikhs were attacked and even killed in vengeance for the Saudi Arabian terror attacks on our country, I led a group of Sikh Silicon Valley professionals from law, business, medicine, and finance to immediately implement a national educational and advocacy effort to inform our fellow Americans about Sikhism, our articles of faith, the distinct appearance of observant Sikhs, and more. This informal working group was called the "Sikh Communications Council." Members included Paul Grewal, who went on to become a federal magistrate judge. While my brother, a turbaned Sikh lawyer, was being called "Osama" at Candlestick Park and Sikh taxi drivers were being assaulted, we made it a priority to keep Sikhs and other Americans safe from this irrational and discriminatory violence. I spent hundreds of hours drafting legal memoranda and advocacy materials for publications, trainings for law enforcement, and more. This work let the American Civil Liberties Union of Northern California to invite me to join their board in 2002 after I appeared on a bar panel with James Brosnahan, prominent Bay Area civil rights and business attorney who was also advocating for religious minority communities at that time. The work of the Sikh Communications Council eventually was absorbed by newly formed Sikh civil rights organizations, including the Sikh Coalition. I have been a substantial donor to several Sikh civil rights and human rights organizations, including SALDEF, Sikh Coalition, and

ENSAAF.

H. Religious Liberty Advocacy more broadly. My law firm has represented religious discrimination plaintiffs and potential litigants on numerous occasions on a pro bono basis. Within the past year my colleagues, with my blessing, supervision and input at settlement, engaged in pre-litigation work resulting in two Sikhs being able to serve as Sheriff's deputies in California counties. We have also counseled and provided legal advice and advocacy to Jewish students facing discrimination on college campuses in 2023 and 2024.

I. Voting Rights/Integrity. I have served as a volunteer legal observer in many election cycles in California, including serving as a poll watcher and recruiting poll workers and poll watchers. I have also trained legal observers on poll watching and led teams of volunteer lawyers on how to assist voters legally. I have answered hotlines of voter calls and provided free guidance to them on various issues that arise during early and election day voting. I have trained hundreds of volunteer lawyers on election integrity, get out the vote, and election-day operations advocacy. Lawyers at my firm, with my guidance and support, have served as volunteer election observers in every one of the last several general election cycles, in multiple jurisdictions.