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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Housing Works, Los Angeles Catholic
Worker, Independent Living Center of
Southern California, Inc., and Timothy
Laraway,

Plaintiffs,

v.

County of Los Angeles, County of
Los Angeles Board of Supervisors, and Los
Angeles County Department of Public
Social Services,

Defendant.

Case No. 2:15-cv-08982 GW
(RAOx)

MEMORANDUM OF POINTS
AND AUTHORITIES IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION

Date: July 11, 2016
Time: 8:30 a.m.
Place: Courtroom 10, Before
The Hon. George H. Wu

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1 **I. INTRODUCTION**

2 Defendants County of Los Angeles, its Board of Supervisors and Department
3 of Public Social Services provide subsistence-level benefits to indigent residents
4 through their General Relief (GR) program. GR has long been the program of last
5 resort for those who are desperately in need and do not qualify for any other aid
6 program to “obtain the means of life.” *Mooney v. Pickett*, 4 Cal. 3d 669, 681
7 (1971). Defendants have implemented a burdensome and complex application
8 process that denies meaningful access to GR benefits to persons with mental and
9 cognitive disabilities. By this Motion, Plaintiffs seek a preliminary injunction to
10 remove one fundamental barrier in that process: the County’s insistence that GR
11 applications be submitted in person at DPSS offices.

12 Defendants’ mandatory in-person GR application process poses often
13 insurmountable barriers for applicants with mental disabilities. DPSS offices have
14 long lines, crowded lobbies, and loud, chaotic conditions inside. The typical GR
15 application process takes *an entire day*, and often more than one visit, where much
16 of the time is spent standing in lines or in the waiting room straining to hear one’s
17 name called over all the noise. As explained by Dr. Mark Ragins in his
18 accompanying declaration, many people suffering from mental and cognitive
19 disorders simply cannot overcome these barriers. Instead, such people frequently
20 give up and leave the DPSS office before completing the application process. As a
21 result, individuals with mental and/or cognitive disabilities are denied meaningful
22 access to the GR benefits to which they are entitled and which are critical to their
23 survival.

24 The County already accepts applications for CalWORKs cash aid, CalFresh
25 food stamps, and Medi-Cal healthcare services by mail, online, and through
26 numerous community organizations and partners. But Defendants refuse to allow
27 GR applicants to submit applications off-site. If Defendants modified their policy
28 to permit remote applications, individuals with mental disabilities could prepare

1 their GR application forms at home or in an advocate’s office and submit these
2 forms without having to visit a DPSS office.

3 The County’s discriminatory policies have caused Plaintiff Housing Works
4 and Plaintiff Independent Living Center of Southern California (ILC) to expend
5 significant resources on assisting their clients with mental disabilities to apply for
6 and receive GR. Because the in-person application process is so burdensome and
7 complicated, the case managers at Housing Works are forced to spend full days
8 accompanying their clients to the DPSS offices, thus diverting their time and
9 resources away from Housing Works’ core mission.

10 For these reasons, Plaintiffs bring the instant motion for a preliminary
11 injunction prohibiting the County from requiring mentally disabled individuals to
12 submit their GR applications in-person at DPSS offices. Plaintiffs meet all the
13 requirements for issuance of a preliminary injunction. Defendants’ conduct clearly
14 violates the Americans with Disabilities Act and related federal and state statutes.
15 Further, Plaintiffs face irreparable harm and the balance of hardships clearly tips in
16 their favor, because of the urgent need for low-income people with mental
17 disabilities to obtain GR benefits, and the ongoing harm to Plaintiffs’ clients,
18 diversion of Plaintiffs’ resources, and frustration of Plaintiffs’ organizational
19 missions. Finally, the public interest clearly favors the enforcement of the anti-
20 discrimination laws. Accordingly, the Court should grant Plaintiffs’ motion.

21 **II. FACTUAL BACKGROUND**

22 **A. The General Relief Program**

23 Welfare & Institutions Code § 17000 requires counties to “relieve and
24 support all incompetent, poor, indigent persons, and those incapacitated by age,
25 disease, or accident, lawfully resident therein, when such persons are not supported
26 and relieved by their relatives or friends, by their own means, or by state hospitals
27 or other state or private institutions.” To fulfill this mandate, the County provides
28

1 financial assistance known as General Relief to indigent residents. GR is
2 administered by DPSS. Defendants' First Amended Answer (FAA) ¶ 4.

3 GR is the program of last resort for Los Angeles County residents.
4 According to DPSS, approximately 60% of GR recipients are unsheltered homeless.
5 See Declaration of Heriberto Alvarez Exhibit A at 1. Eligibility for the County's
6 GR program is limited to those destitute residents who have \$50 or less and whose
7 income is less than \$221 per month. See County of Los Angeles General Relief
8 Policy¹ §§ GR 42-211.1 & GR 44-101.1. A GR recipient living alone receives a
9 maximum monthly grant of \$221, which ostensibly covers the recipient's housing,
10 food, clothing, and personal needs. *Id.* at § GR 44-201.

11 A significant percentage of those eligible for GR suffers from mental
12 disabilities. The Los Angeles Homeless Services Authority estimates that in 2016
13 30-40% of the homeless in the County suffered from mental illness, developmental
14 disability, or brain injury. See H. Alvarez Exh. B at 25. Other estimates vary, but a
15 significant portion of GR applicants have a mental disability.²

16 **B. Defendants' Mandatory In-Person GR Application Process Is**
17 **Long, Complex, Intimidating, and Confusing**

18 Defendants only accept GR applications *in-person at DPSS offices*, and
19 refuse to accept applications by mail, fax, email, or online. FAA ¶ 32. For persons
20 with mental disabilities, "the most difficult part of applying for GR benefits is
21 going to the DPSS office. The process of applying for GR is complex, frustrating,
22 and time-consuming." Declaration of Anthony Ruffin ¶ 10. The process includes
23

24 ¹ Available at https://dpss.lacounty.gov/dpss/GR/pdf/general_relief_policy.pdf.

25 ² See, e.g., J. Cook, et al., "Prevalence of Psychiatric and Substance Use Disorders
26 Among Single Mothers Nearing Lifetime Welfare Eligibility Limits," 66 *Arch Gen.*
27 *Psychiatry* 249-58 (2009) (finding 44% of TANF recipients to have a mental
28 disorder).

1 the following steps:

2 **Step One:** Travel to DPSS Office: Defendants require indigent residents to
3 apply in-person at one of the 14 DPSS offices. FAA ¶ 32.

4
5 **Step Two:** Stand in Outside Line: Once GR applicants arrive at the DPSS
6 office, they must stand outside in line, often for a long period of time, just to
7 enter the office. Declaration of Karen Carson ¶ 10 (“we usually wait forty-five
8 minutes in line”); Ruffin Decl. ¶ 12; Declaration of Ivan Galvez ¶ 15;
9 Declaration of Strider Lloyd ¶ 9; Declaration of Charles Jarret ¶ 16; FAA ¶ 32
10 (“Defendants admit that GR applicants. . . may encounter lines during this
11 process”). The lines are “especially problematic” for persons who suffer from
12 anxiety and depression as they become restless, agitated and want to go home.
13 Ruffin Decl. ¶ 12. Security guards generally refuse requests to allow persons
14 with mental disabilities to skip the line. Carson Decl. ¶ 12; Declaration of Dr.
15 Mark Ragins ¶ 6.

16
17 **Step Three:** Pass Through Security: At the end of the outside line, applicants
18 must pass through a security checkpoint which often includes a pat-down
19 inspection by security guards. FAA ¶ 33; Carson Decl. ¶ 11; Ruffin Decl. ¶¶ 13-
20 16; Declaration of Judy Diaz ¶ 6. Persons with post-traumatic stress and other
21 mental disorders are often frightened and intimidated by the security guards.
22 Carson Decl. ¶ 11; Ruffin Decl. ¶¶ 13-16; Diaz Decl. ¶ 6; Ragins Decl. ¶ 32.

23
24 **Step Four:** Stand in Line to Receive GR Application: When they get inside,
25 applicants must wait in another line to check in and obtain an application packet
26 from a DPSS worker. FAA ¶ 34; Carson Decl. ¶ 14; Ruffin Decl. ¶ 17; Ragins
27 Decl. ¶ 6; Declaration of Timothy Laraway ¶¶ 12-14; Diaz Decl. ¶ 7; Galvez
28 Decl. ¶¶ 10, 16. The DPSS lobbies are crowded and have numerous different

1 lines providing different services, and thus it is very difficult for applicants with
2 mental disabilities to figure out which line they are supposed to stand in. *See* H.
3 Alvarez Exhs. C (showing forty-one individuals waiting in the lobby), D
4 (showing forty-nine individuals waiting in the lobby); Ragins Decl. ¶¶ 10-11;
5 Laraway Decl. ¶¶ 12-14; Diaz Decl. ¶ 8; Lloyd Decl. ¶ 10. Even if they do find
6 the correct line, it can be almost an hour long. Carson Decl. ¶ 14; Ruffin Decl. ¶
7 17; Galvez Decl. ¶¶ 15-16. Persons with mental disorders are often
8 overwhelmed by noisy and sometimes chaotic conditions in the DPSS lobby.
9 Carson Decl. ¶ 15; Ragins Decl. ¶¶ 8-12, 27-29; Laraway Decl. ¶ 13; Diaz Decl.
10 ¶ 9. And it is extremely difficult for such persons to hear and understand DPSS
11 employees behind the glass partitions. Ruffin Decl. ¶¶ 18-19.

12
13 **Step Five:** Fill Out GR Application Paperwork: Once they have the GR
14 application packet, applicants have to find a place in the lobby to fill it out.
15 Ruffin Decl. ¶ 20; Ragins Decl. ¶ 6; Laraway Decl. ¶ 14; Lloyd Decl. ¶¶ 10-11.
16 As this packet asks “complicated questions about an individual’s background,
17 personal and financial situation,” mentally disabled applicants frequently “are
18 unable to complete the GR paperwork on their own due to their mental health
19 issues.” Ruffin Decl. ¶ 20; Ragins Decl. ¶¶ 18-20. Yet DPSS employees rarely,
20 if ever, help GR applicants fill out the paperwork. Ruffin Decl. ¶ 21; *see also*
21 Diaz Decl. ¶¶ 14-17; Lloyd Decl. ¶¶ 15-16; Jarrett Decl. ¶ 19; Carson Decl. ¶ 17.

22
23 **Step Six:** Wait for an Eligibility Worker to Accept the Application:
24 Applicants who manage to complete the application packet cannot submit it
25 immediately. Instead, they are required to wait in the DPSS office to meet with
26 an eligibility worker. FAA ¶ 36 (“GR applicants are required to submit their
27 application packet to and meet with a DPSS caseworker” and they “may
28 encounter some waiting time during this process.”). The wait can take hours, or

1 even the entire day, as applicants strain to hear their name called in the noisy
2 waiting room. *See* H. Alvarez Exhs. E (showing estimated wait time of three
3 hours to be called by eligibility worker), F (showing some individuals waiting
4 for at least four hours to be interviewed), G (showing some individuals waiting
5 for at least six hours to be interviewed); Carson Decl. ¶ 14-15; Ruffin Decl. ¶ 22;
6 Laraway Decl. ¶¶ 14-15; Diaz Decl. ¶¶ 9-10; Lloyd Decl. ¶¶ 11-12. Applicants
7 are afraid to leave the lobby for any reason—even to go to the bathroom—out of
8 fear that they will miss their name being called. Carson Decl. ¶ 16; Ruffin Decl.
9 ¶ 23; Diaz Decl. ¶ 11; Jarrett Decl. ¶ 17. Applicants cannot leave the lobby
10 without being required to wait in the outside line again and go through another
11 security check. Carson Decl. ¶ 16; Diaz Decl. ¶ 11. The long wait in a noisy
12 DPSS office can be intolerable for persons with mental disorders, and the
13 disputes that often break out among other DPSS clients are frightening to people
14 with mental disorders. Carson Decl. ¶ 15 (mentally disabled applicants “spend
15 the majority of their time worrying, wanting to leave . . . or dealing with other
16 symptoms of their disease”); Ragins Decl. ¶¶ 33-34; Laraway Decl. ¶ 26; Diaz
17 Decl. ¶ 11; Galvez Decl. ¶ 15.

18
19 **Step Seven: Meet with an Eligibility Worker:** When applicants finally meet
20 with an eligibility worker, that worker reviews the application and decides
21 whether the applicant is eligible for GR. FAA ¶ 37; Laraway Dec. ¶ 16. The
22 worker also must categorize the applicant as “employable” or “unemployable.”
23 FAA ¶ 37. If an applicant appears to have serious mental disabilities, the
24 eligibility worker is supposed to categorize the applicant as “unemployable” and
25 refer him to “Needs Special Assistance” (NSA) screening, but in practice
26 eligibility workers frequently categorize mentally disabled applicants as
27 “employable” and fail to provide them with NSA assistance. *See, e.g.*, Ruffin
28 Decl. ¶ 29 (“DPSS caseworkers have always classified my participants as

1 employable,” even those “who are schizophrenic and suffer the typical
2 symptoms of talking to themselves and acting erratically.”); Galvez Decl. ¶¶ 10-
3 20; Laraway Decl. ¶¶ 7-9; Lloyd Decl. ¶¶ 15-17; Jarrett Decl. ¶ 18.

4
5 **Step Eight:** Mental Health Evaluation: If the DPSS eligibility worker
6 believes an applicant is potentially NSA, then the applicant is required to
7 continue waiting in the lobby, sometimes for hours, until a Department of
8 Mental Health (DMH) or Adult Protective Services (APS) representative is
9 available to evaluate the applicant. FAA ¶ 38; Laraway Decl. ¶ 19; Diaz Decl. ¶
10 19; Declaration of David Cash ¶ 8; Jarrett Decl. ¶¶ 19-20. If a DMH or APS
11 evaluator is unavailable, applicants are scheduled for a future appointment,
12 requiring them to return to the DPSS office, go through the security lines again,
13 and wait in the DPSS office again. *See* FAA ¶ 38 (“evaluations are typically
14 scheduled to occur on the same day . . . but may . . . be scheduled for a later
15 date” and “applicants may encounter wait times during this process”); Ruffin
16 Decl. ¶¶ 29-30; Ragins Decl. ¶ 6; Cash Decl. ¶ 9; Jarrett Decl. ¶¶ 19-20.

17
18 **Step Nine:** Fingerprinting: Whether or not they are given a mental health
19 evaluation, all GR applicants must wait additional time in the lobby for their
20 names to be called for fingerprinting. *See* H. Alvarez Exh. E (showing estimated
21 wait time of one and a half hours to be called for fingerprinting); FAA ¶ 39;
22 Ragins Decl. ¶ 6; Laraway Decl. ¶¶ 22-23; Galvez Decl. ¶ 10; Lloyd Decl. ¶ 14.

23
24 **Step Ten:** Receive EBT Card: After providing fingerprints, applicants
25 must continue waiting in the lobby for additional time until they are called to
26 receive an electronic balance transfer (EBT) card. FAA ¶ 39; Ragins Decl. ¶ 6.
27 After spending an entire day in the DPSS office, applicants are finally permitted
28 to leave. *See, e.g.,* Laraway Decl. ¶¶ 12, 23 (Mr. Laraway arrived at the DPSS

1 office at 9:00 a.m., and was required to wait in the DPSS waiting room until
2 4:06 p.m. to complete his application).

3
4 **Step Eleven:** Return to DPSS Office Within 30 Days with Documents:

5 Within 30 days of their initial application, GR applicants are required to return
6 to the DPSS office, wait in line, go through security, check in, and then provide
7 documentary proof of eligibility to their eligibility worker. Ragins Decl. ¶ 6;
8 Lloyd Decl. ¶ 18; FAA ¶ 40. If applicants miss the appointment or are unable to
9 provide documents to the satisfaction of DPSS workers, their GR applications
10 are denied. Ragins Decl. ¶ 6; Lloyd Decl. ¶ 18; FAA ¶ 40.

11
12 **C. Defendants’ Mandatory In-Person GR Application Presents**
13 **Unreasonable Barriers to Persons with Mental Disabilities**

14 Dr. Mark Ragins—Medical Director of the Mental Health America Village
15 Integrated Service Agency in Long Beach, California—has examined the GR
16 application process. *See* Ragins Decl. ¶¶ 1-5. In his expert opinion, the “GR
17 application process presents barriers to persons with mental and developmental
18 disabilities” in that DPSS has imposed a series of tasks that “are either impossible
19 or exceedingly difficult for these persons to complete because of their disabilities”
20 and that also “exacerbate these individuals’ disabilities, making them sicker to the
21 extent that they cannot complete the task.” *Id.* ¶ 6; *see also id.* ¶¶ 7-30.

22 First, persons with certain mental disorders, such as schizophrenia,
23 psychosis, Post-Traumatic Stress Disorder, autism, and other developmental
24 disabilities struggle with sorting relevant foreground information from unimportant
25 background details. *Id.* ¶¶ 9, 11. Thus, when such persons find themselves in large
26 and confusing DPSS lobbies, with multiple lines and windows and no instructions
27 telling them what to do, they quickly become confused and fixate on unimportant
28 details, rendering them unable to focus on the essential information necessary to

1 carry out the application process. *Id.* ¶¶ 8-10, 12. Similarly, persons with mania
2 and anxiety easily become overstimulated by the DPSS lobby’s many signs,
3 pictures, crowds of people, announcement of names, and lack of an obvious
4 “starting point.” *Id.* ¶ 11. Applicants with Obsessive-Compulsive Disorder also
5 become overwhelmed by the office’s large amount of information presented in a
6 disorderly manner, and become distressed as they attempt to organize the
7 information. *Id.* As such, many mentally disabled applicants “will find it
8 impossible to begin the GR application process.” *Id.* ¶ 12.

9 Second, the GR application process presents barriers to persons with mental
10 disabilities because it requires them to sustain attention during an extended waiting
11 period, struggling to hear their names called by DPSS workers in a noisy lobby on
12 multiple occasions throughout the course of a day. *Id.* ¶¶ 14-16. Persons with
13 mental disorders such as schizophrenia have severely curtailed attention spans and
14 it is impossible for them to wait in this manner from an extended period of time.
15 *Id.* ¶ 14. And persons with other mental disorders such as social anxiety or
16 paranoia may become preoccupied with trying to remain calm in the noisy, crowded
17 environment, which can easily cause them to miss their name being called. *Id.* ¶
18 15.

19 Third, Defendants’ complex ten-page GR application form presents an
20 enormous barrier to persons with mental and/or cognitive disabilities. *Id.* ¶¶ 18-26;
21 *see also* H. Alvarez Exh. H (Defendants’ GR Application). The form requires
22 applicants to answer 22 complicated, multi-step questions and to “read through
23 another 5 pages of dense wording written in ‘legalese.’” Ragins Decl. ¶ 19. But
24 “persons with virtually any mental disorder have extreme difficulty completing
25 multi-step, complex commands separated over time.” *Id.* ¶ 18. Persons with
26 schizophrenia or developmental disabilities frequently are unable to understand
27 questions and make abstract distinctions. *Id.* ¶¶ 18-23. And persons with mental or
28 developmental disabilities often are functionally illiterate and cannot read or

1 understand complex legal language. *Id.* ¶ 24. Hence, many GR applicants with
2 disabilities “cannot successfully apply for GR, either because they will make
3 mistakes in the application or . . .they will not understand the instructions and give
4 up in frustration.” *Id.* ¶ 20.

5 Fourth, the GR application process discriminates against people with mental
6 or developmental disabilities by requiring them to complete tasks that exacerbate
7 their disabilities and make them sicker to the extent that they cannot complete the
8 task. *Id.* ¶¶ 6, 31-42. The security inspection process, which frequently includes a
9 pat-down and walking in front of a one-way mirror, can exacerbate the delusions of
10 people suffering from paranoia. *Id.* ¶ 32. Conditions in the DPSS office lobby can
11 also trigger and worsen symptoms for those whose mental disability is related to a
12 past trauma, such as PTSD, sexual abuse and panic disorders. *Id.* ¶¶ 33-34.

13 Similarly, the noise and crowds in the lobby can trigger trauma and cause persons
14 with anxiety disorders or PTSD to become “hypervigilant,” or extremely agitated
15 and stressed. *Id.* ¶¶ 35-37. The GR application process can also worsen symptoms
16 of depression and “learned helplessness,” causing mentally ill persons to feel
17 worthless and powerless to the point where they shut down and become unable to
18 complete the process. *Id.* ¶¶ 38-42.

19 **D. Defendants’ NSA Program Is Insufficient to Overcome These** 20 **Barriers**

21 Defendants have adopted a “Needs Special Assistance” program intended to
22 accommodate persons with mental disabilities. *See* FAA ¶ 41. As currently
23 implemented, however, the NSA program is utterly inadequate to address the
24 barriers imposed by the mandatory in-person application process.

25 To begin with, Defendants generally do not screen for NSA until *after*
26 applicants have stood in at least two long lines, passed through a security
27
28

1 checkpoint, and waited for hours in in a crowded and noisy DPSS lobby to be
2 called by an eligibility worker.³ See FAA ¶¶ 32-37. For example, although
3 Plaintiff Timothy Laraway repeatedly identified himself as mentally disabled to
4 DPSS employees, Defendants forced him to wait three-and-one-half hours in the
5 lobby before screening him for NSA. Laraway Decl. ¶¶ 12-20.

6 Having an NSA process thus does nothing to assist those persons whose
7 mental disabilities render them unable to go to the office, wait in long lines, and
8 suffer for hours in a crowded lobby. Nor does the NSA process assist applicants
9 whose social or cognitive difficulties cause them to give up and leave the DPSS
10 office without completing their application packet.

11 Further, Defendants' singular focus on employability prevents them from
12 identifying significant numbers of mentally ill people who need special assistance.
13 Ragins Decl. ¶ 7; Ruffin Decl. ¶¶ 28-29. For example, Defendants have wrongly
14 decided that Declarant Ivan Galvez is "employable" notwithstanding his mental
15 disorders, and have failed to provide him any NSA assistance, which has prevented
16 him from accessing GR benefits. See Galvez Decl. ¶¶ 10-20.

17 Moreover, even if applicants are identified and designated as NSA,
18 Defendants still require them to spend up to a whole day, or longer, in the DPSS
19 office, waiting to be called for eligibility worker meetings, mental health screening,
20

21 ³ While Defendants supposedly conduct "lobby sweeps," FAA ¶ 45, Defendants
22 have stated that it is a "false premise[]" that "'sweeps of the lobbies at each DPSS
23 OFFICE' . . . are intended to be 'effective in identifying GR APPLICANTS with
24 MENTAL DISABILITIES.'" H. Alvarez Exh. I (Defendants' Responses to
25 Plaintiff's First Set of Interrogatories) at 16. To the extent that lobby sweeps occur,
26 they are too short and superficial in most instances to assess whether a person has a
27 mental disability. Ragins Decl. ¶ 13. Further, Defendants' lobby sweeps routinely
28 fail to identify mentally disabled applicants, even when they exhibit obvious
unusual behavior. See Lloyd Decl. ¶¶ 15-17. And lobby sweeps certainly cannot
hope to identify persons with mental disorders who are too afraid to come into the
DPSS lobby in the first place.

1 fingerprinting, and EBT card distribution. In theory, applicants designated NSA
2 can request accommodations during the application process, but Defendants have
3 not yet trained DPSS staff on providing appropriate accommodations, and NSA
4 designees are often forced to endure the same lines, long waits, and chaotic
5 conditions as other applicants. Ruffin Decl. ¶ 7; *see also* Laraway Decl. ¶¶ 11-23
6 (despite designating Mr. Laraway as NSA, Defendants required Mr. Laraway to
7 wait for seven hours in the DPSS lobby to complete his application).

8 **E. Defendants Refuse to Lower These Barriers by Accepting Off-Site**
9 **Applications**

10 Many of the barriers described above could be eliminated or lowered if
11 Defendants would simply allow mentally disabled individuals to apply for GR
12 without having to experience the trauma and confusion of going to the DPSS office.
13 With remote applications by mail, fax, email, online or through satellite community
14 organization locations, GR applicants whose mental disorders make it impossible
15 for them to endure the DPSS offices could calmly prepare their applications and
16 supporting documents and send these materials to DPSS. Ragins Decl. ¶ 43; Lloyd
17 Decl. ¶ 21. In addition, applicants who could not complete the GR application form
18 due to their mental or cognitive disorders could get help from friends, relatives, and
19 community advocates before sending the documents to DPSS. Ragins Decl. ¶ 43;
20 Lloyd Decl. ¶ 21. After receiving the off-site application, Defendants could also
21 follow up by telephone as necessary to complete additional screening and make
22 appointments for fingerprinting and health evaluations that are tailored to the
23 individual applicant's needs and abilities.

24 Despite the benefits of accepting off-site applications, Defendants continue to
25 mandate in-person applications for GR. Clearly an off-site application process is
26 feasible, however, because Defendants currently accept off-site and online
27
28

1 applications for all their major aid programs except GR, including CalFresh⁴ food
2 assistance, CalWORKs⁵ cash aid, and Medi-Cal⁶ healthcare services. *See* FAA ¶ 5.

3 **F. Defendants’ Mandatory In-Person GR Application Policy Has**
4 **Diverted Plaintiffs’ Resources and Frustrated Their Mission**

5 An off-site GR application process would also greatly reduce the resources
6 that Plaintiff Housing Works and other advocacy groups such as Plaintiff ILC must
7 expend to help GR applicants. As set forth in the attached declarations, the
8 mandatory in-person application policy requires Housing Works to send advocates
9 to accompany GR applicants during the all-day, in-person application process. An
10 off-site GR application process would allow Housing Works to conserve resources
11 for its core mission.

12 Plaintiff Housing Works is a nonprofit organization whose mission is to
13 create accessible housing and service options that model, with respect and dignity,
14 sustainable, environmentally sensitive, and affordable communities with people of
15 limited resources. Declaration of Celina Alvarez ¶ 2; Carson Decl. ¶ 2; Ruffin

16
17 ⁴ *See* DPSS Website, “How to Apply”
18 (<https://dpss.lacounty.gov/dpss/calfresh/apply.cfm>) (instructing CalFresh applicants
19 that they may apply for benefits online, “[a]t your Community and Faith-Based
20 Organizations,” “[a]t convenient community CalFresh Outreach Sites,” “[b]y mail,”
or at a DPSS office).

21 ⁵ DPSS Website, “CalWorks – HOW TO APPLY”
22 (<http://dpss.lacounty.gov/dpss/calworks/default.cfm>) (“Needy families may apply
23 for assistance online or by coming in to one of our local DPSS Office locations.
However, the easiest and quickest way to apply for CalWORKs is online at
<https://www.dpssbenefits.lacounty.gov/ybn/SignInPage.html>”) (accessed 3/4/2016).

24 ⁶ *See* DPSS Website, Health Care, “How to Apply”
25 (<https://dpss.lacounty.gov/dpss/health/>) (explaining that “Your Benefits Now! is a
26 website for Los Angeles County Residents to apply for and to view their benefits
27 online. Currently, Your Benefits Now! supports CalFresh, Medi-Cal, and
28 CalWORKs applications”; alternatively, Medi-Cal “Applications can be mailed to
the Medi-Cal Mail-in Application Office,” or applicants can go to the DPSS office).

1 Decl. ¶ 2. Housing Works' primary goal is to secure permanent supportive housing
2 for its chronically homeless clients, the majority of whom suffer from mental
3 disabilities. C. Alvarez Decl. ¶¶ 3-4, 9; Carson Decl. ¶¶ 3-4; Ruffin Decl. ¶¶ 3-4.
4 Once its clients are housed, Housing Works continues to promote their housing
5 stability through on-site, holistic services such as mental health counseling, job
6 placement, and assistance with applying for public benefits, such as GR and
7 Supplemental Security Insurance. C. Alvarez Decl. ¶ 5; Carson Decl. ¶ 5; Ruffin
8 Decl. ¶ 5.

9 Because of Defendants' mandatory in-person GR application policy, Housing
10 Works is forced to divert significant resources and employee time away from its
11 core mission of placing its clients in permanent supportive housing. Because its
12 mentally disabled clients generally cannot endure the long lines and waits at DPSS
13 offices alone, Housing Works employees frequently must accompany clients and
14 shepherd them through the all-day, in-person application process, providing
15 advocacy and emotional support as needed. C. Alvarez Decl. ¶¶ 9-10; Carson Decl.
16 ¶¶ 8-18; Ruffin Decl. ¶¶ 10-27. Although Housing Works case managers routinely
17 ask Defendants to designate their clients as NSA, this designation does nothing to
18 reduce the interminable waiting in crowded DPSS lobbies that mentally disabled
19 clients must endure to apply for GR. C. Alvarez Decl. ¶ 11. Nor have Defendants
20 ever granted Housing Works' requests to allow clients to apply without spending all
21 day in the DPSS office. C. Alvarez Decl. ¶ 17.

22 If this Court were to prohibit Defendants from requiring mentally disabled
23 individuals to submit their GR applications in person, Housing Works would
24 prepare and submit its clients' GR applications, and assist with telephonic follow-
25 up interviews, from its offices in Hollywood. C. Alvarez Decl. ¶ 16; Carson Decl. ¶
26 19; Ruffin Decl. ¶ 33. Such a procedure would save Housing Works' staff and
27 clients from the enormous burden of traveling to, and spending an entire working
28 day in, a DPSS office. C. Alvarez Decl. ¶ 16; Carson Decl. ¶ 19; Ruffin Decl. ¶ 33.

1 This solution would greatly reduce the stress on Housing Works' clients, as well as
2 the drain on Housing Works' resources and staff time, which Housing Works could
3 then rededicate to its core mission. C. Alvarez Decl. ¶¶ 14-15. Such an injunction
4 would also reduce the resources that Plaintiff ILC must expend to obtain GR for its
5 disabled clients. Declaration of Norma Vescovo ¶ 16.

6 **III. LEGAL STANDARD**

7 In deciding whether to grant a preliminary injunction, the court "must
8 consider four factors: (1) whether the plaintiff has shown a likelihood of success on
9 the merits; (2) whether the plaintiff has shown a likelihood of irreparable harm in
10 the absence of preliminary relief; (3) whether the balance of equities tips in the
11 plaintiff's favor; and (4) whether preliminary relief is in the public interest." *Vivid*
12 *Entm't, LLC v. Fielding*, 774 F.3d 566, 577 (9th Cir. 2014). Courts analyze these
13 factors on a "sliding scale," such that "a stronger showing of one element may
14 offset a weaker showing of another." *Alliance for the Wild Rockies v. Cottrell*, 632
15 F.3d 1127, 1131 (9th Cir. 2011). All four factors favor issuance of a preliminary
16 injunction in this case.

17 Although injunctions requiring some affirmative conduct are subject to a
18 higher standard, Ninth Circuit precedent holds that mandatory preliminary
19 injunctions should issue where the facts and law clearly favor the moving party, as
20 they do here. *Dahl v. HEM Pharma. Corp.*, 7 F.3d 1399, 1403 (9th Cir. 1993); *see*
21 *also Rouser v. White*, 707 F. Supp. 2d 1055, 1061-73 (E.D. Cal. 2010) (granting a
22 mandatory injunction ordering prison to implement actions that would allow inmate
23 to practice Wiccan religion).

24 Further, "[a]n injunction benefiting nonparties is permissible if such breadth
25 is necessary to give prevailing parties the relief to which they are entitled." *Price v.*
26 *City of Stockton*, 390 F.3d 1105, 1117 (9th Cir. 2004). Here, the requested
27 injunction would benefit large numbers of mentally disabled persons by allowing
28 them to apply for GR without going to a DPSS office. Such an injunction is

1 appropriate under *Price* because it is the only way to prevent Plaintiffs Housing
 2 Works and ILC from suffering irreparable harm from the diversion of their
 3 resources and staff time caused by Defendants' unlawful policy.

4 **IV. ARGUMENT**

5 **A. Plaintiffs Are Likely to Prevail on Their Claim that Defendants'** 6 **Mandatory In-Person GR Application Violates the Americans with** 7 **Disabilities Act, the Rehabilitation Act, and California** 8 **Government Code § 11135**

9 By forcing people with mental disabilities to apply for GR in person at a
 10 DPSS office, Defendants violate Title II of the ADA, Section 504 of the
 11 Rehabilitation Act, and California Government Code § 11135. The ADA provides
 12 that: “[N]o qualified individual with a disability shall, by reason of such disability,
 13 be excluded from participation in or be denied the benefits of the services,
 14 programs, or activities of a public entity, or be subjected to discrimination by any
 15 such entity.” 42 U.S.C. § 12132. Section 504 of the Rehabilitation Act, 29 U.S.C.
 16 § 794(a), and California Government Code § 11135, similarly prohibit the denial of
 17 benefits to the disabled by entities receiving federal and state funds, respectively,
 18 and the violations of all three statutes are properly evaluated together.⁷

19 To establish that Defendants' mandatory in-person GR application
 20 requirement violates the ADA, Plaintiffs must show that (1) Defendants are subject
 21 to the ADA.⁸ (2) the clients of Housing Works and ILC are “qualified individual[s]

22 ⁷ See *Zukle v. Regents of Univ. of Cal.*, 166 F.3d 1041, 1045 (9th Cir. 1999) (“There
 23 is no significant difference in analysis of the rights and obligations created by the
 24 ADA and the Rehabilitation Act.”); *D.K. v. Solano Cty. Office of Educ.*, 667 F.
 25 Supp. 2d 1184, 1191 (E.D. Cal. 2009) (“[I]f Plaintiffs state a claim under the
 26 Rehabilitation Act, they have also stated a State law cause of action under Cal. Gov.
 27 Code § 11135, provided there is an additional allegation of State financial
 28 assistance.”).

⁸ Defendants do not dispute this element, and further admit they receive federal and
 state funds. FAA ¶¶ 101, 113.

1 with a disability”; and (3) Defendants are denying these persons the opportunity to
2 participate in or benefit from the GR program because of their disabilities. *See*
3 *Lovell v. Chandler*, 303 F.3d 1039, 1052 (9th Cir. 2002).

4 **1. The Clients of Housing Works and ILC Are Qualified**
5 **Individuals with a Disability**

6 The ADA defines a “qualified individual with a disability” as “an individual
7 with a disability who, with or without reasonable modifications to rules, policies, or
8 practices, the removal of . . . barriers, or the provision of auxiliary aids and services,
9 meets the essential eligibility requirements for the receipt of services or the
10 participation in programs or activities provided by a public entity.” 42 U.S.C. §
11 12131(2). The definition of “disability” includes “[a]ny mental or psychological
12 disorder, such as an intellectual disability . . . emotional or mental illness, and
13 specific learning disabilities.” 29 C.F.R. § 1630.2.

14 Many clients of Housing Works and ILC, as well as thousands of other GR
15 applicants, are qualified individuals with disabilities. Housing Works, for instance,
16 assists clients who have moderate to severe symptoms of social anxiety, post-
17 traumatic stress, memory issues and other cognitive disabilities. Carson Decl. ¶ 8;
18 Ruffin Decl. ¶ 10; C. Alvarez Decl. ¶ 9. Indeed, Housing Works’ clients often are
19 direct referrals from the Los Angeles County Department of Mental Health. Carson
20 Decl. ¶ 4; Ruffin Decl. ¶ 4; C. Alvarez Decl. ¶ 4. Many of these clients are
21 qualified for GR because they are County residents, have less than \$50 in assets,
22 and have incomes of less than \$221 per month. Carson Decl. ¶ 7; Ruffin Decl. ¶ 9.

23 **2. Defendants’ Policy Denies Mentally Disabled Applicants**
24 **Meaningful Access to General Relief Benefits**

25 The ADA prohibits Defendants from utilizing methods of administration that
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27
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1 substantially impair access to individuals with disabilities.⁹ In *Alexander v. Choate*,
2 469 U.S. 287, 295 (1985), the Supreme Court concluded that Congress intended to
3 protect disabled persons from discrimination arising out of both discriminatory
4 animus and “thoughtlessness,” “indifference,” and “benign neglect.” Thus, the
5 Court held that ADA is violated when disabled persons were denied “meaningful
6 access” to state-provided services. *Id.* at 302; *see also Ferguson v. City of Phoenix*,
7 157 F.3d 668, 679 (9th Cir. 1998).

8 The Ninth Circuit addressed this standard of meaningful access in *Crowder v.*
9 *Kitigawa*, 81 F.3d 1480 (9th Cir. 1996). There, plaintiffs were visually impaired
10 users of guide dogs who challenged Hawaii’s 120-day quarantine for certain
11 animals coming into Hawaii. *Id.* at 1482-83. The defendant argued that the
12 quarantine did not violate the ADA because it was not a “service or benefit” of the
13 state but instead a public-health measure. The Ninth Circuit squarely rejected that
14 argument:

15 [T]he state’s quarantine requirement denies visually-impaired persons
16 the ability to make meaningful use of services the state provides. The
17 plaintiffs rely upon their guide dogs to assist them in negotiating
18 public streets and using transportation systems. Without their dogs to
19 guide them, the plaintiffs are severely restricted in their ability to use
20 state services.

21 *Id.* at 1482. The court compared the quarantine to other types of barriers widely
22 accepted to be discriminatory:

23
24
25 ⁹ *See* 28 C.F.R. § 35.130(b)(3) (“A public entity may not . . . utilize . . . methods of
26 administration . . . [t]hat have the purpose or effect of defeating or substantially
27 impairing accomplishment of the objectives of the public entity’s program with
28 respect to individuals with disabilities.”).

1 Few would argue that architectural barriers to disabled persons such
2 as stairs, or communication barriers such as the preference for the
3 spoken word, are intentionally discriminatory. Yet, stairs can deny
4 the wheelchair-bound access to services provided on the second floor
5 of a government building; and communicating only by the spoken
6 word can deny deaf persons the ability to find out that it is the second
7 floor where they must go to obtain the services they seek.

8 These and other types of barriers to participation by the
9 disabled in public life do not provide any benefits themselves.
10 Neither stairs nor the spoken word is a “service, program, or activity”
11 of a public entity, yet each can effectively deny disabled persons the
12 benefits of state services, programs or activities.

13 *Id.* at 1483-84 (alterations omitted). The court held that, like stairs or
14 communication barriers, the animal quarantine functioned as a barrier preventing
15 visually impaired people from meaningful access to state services. *Id.* at 1485.

16 As in *Crowder*, the Defendants here have erected multiple, cumulative
17 barriers that block GR applicants with mental disabilities from meaningful access to
18 essential public benefits. *See generally*, Ragins Decl. ¶¶ 6-42. These qualified
19 individuals with disabilities are thus “burdened . . . in a manner different from and
20 greater than . . . non-disabled residents, solely as a result of [their] disabling
21 condition.” *McGary v. City of Portland*, 386 F.3d 1259, 1265 (9th Cir. 2004). *See*
22 *Rodde v. Bonta*, 357 F.3d 988, 998 (9th Cir. 2004); *Communities Actively Living*
23 *Indep. & Free v. City of L.A.*, No. CV 09-0287 CBM RZX, 2011 WL 4595993, at
24 *13 (C.D. Cal. Feb. 10, 2011) (finding that individuals with disabilities lacked
25 meaningful access to the City’s emergency preparedness program due to, among
26 other things, lack of provisions “to evacuate, transport, or temporarily house
27 individuals with disabilities during or immediately following an emergency or
28 disaster”).

1 Indeed, the consequences of the denial of meaningful access may be even
2 worse in this case than in *Crowder*. While the plaintiffs in *Crowder* were barred
3 from meaningful access to public streets and transportation, Defendants’
4 discriminatory policies prevent disabled GR applicants from meaningful access to
5 subsistence benefits critical to their very survival. *Cf.* 81 F.3d at 1482. As
6 explained above in section II.C, the GR application process effectively bars
7 mentally disabled GR applicants from meaningful access to life-sustaining
8 government benefits.

9 In *Henrietta D. v. Bloomberg*, 331 F.3d 261 (2d Cir. 2003), the Second
10 Circuit confronted a comparable case involving public benefit applicants whose
11 AIDS-related disabilities “sharply limited . . . their ability ‘to travel, stand in line,
12 attend scheduled appointments, complete paper work, and otherwise negotiate
13 medical and social service bureaucracies.’” *Id.* at 278 (alterations and citation
14 omitted). The Court of Appeals held that “injunctive relief to remedy a violation of
15 the ADA or Rehabilitation Act is appropriate if it provides the injured plaintiff with
16 ‘meaningful access’ to the programs or services to which the plaintiff is facially
17 entitled.” *Id.* at 291. Accordingly, the court affirmed an injunction requiring New
18 York City and State benefit administrators to adopt affirmative steps to provide
19 meaningful access to such persons, including by “provid[ing] ‘intensive case
20 management’ and . . . maintain[ing] specified ratios of caseworkers and supervisors
21 to cases at each field office.” *Id.* at 271, 291. Similarly here, the Court should
22 issue an injunction requiring Defendants to provide Housing Works’ and ILC’s
23 clients with meaningful access to GR benefits.

3. Remote GR Applications Are a Reasonable Accommodation

The ADA obligates Defendants to adopt reasonable modifications to provide meaningful access to disabled individuals.¹⁰ Having met the burden of producing evidence that Plaintiffs are qualified under Title II of the ADA, Plaintiffs must show the existence of a reasonable accommodation. *Zukle*, 166 F.3d at 1047. Once that showing is made, the burden shifts to Defendants to prove that the accommodation sought would require a fundamental or substantial modification of its programs and standards. *Id.* “[M]ere speculation that a suggested accommodation is not feasible falls short of the ... requirement.” *Wong v. Regents of Univ. of Cal.*, 192 F.3d 807, 818 (9th Cir. 1999) (alterations and quotation marks omitted).

As explained above in section II.E, permitting mentally disabled individuals to apply for benefits from off-site is a reasonable accommodation that would provide a substantial improvement in the ability of mentally disabled individuals to access GR benefits. To date, however, Defendants have refused to adopt this basic change, despite the fact that they provide the very kind of out-of-office application process for obtaining a number of other public benefits, including CalFresh, CalWORKs, and Medi-Cal.

Because Defendants cannot show that accepting off-site applications would “fundamentally alter the nature” of their GR program, refusing to adopt this simple modification clearly violates the ADA. *See, e.g., PGA Tour, Inc. v. Martin*, 532 U.S. 661, 690 (2001) (allowing a disabled golf tournament contestant to use a golf cart would not fundamentally alter the nature of the tournaments); *Lentini v. Cal.*

¹⁰ 28 C.F.R. § 35.130(b)(7) (“A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.”).

1 *Ctr. for the Arts, Escondido*, 370 F.3d 837, 845-46 (9th Cir. 2004) (requiring a
2 concert hall to admit a service animal that had previously barked during a concert
3 was not a fundamental alteration to the service provided by the hall).

4 For the foregoing reasons, Plaintiffs have demonstrated that Defendants'
5 mandatory in-person GR application policy is illegal under the ADA, the
6 Rehabilitation Act, and California law because the policy bars mentally disabled
7 persons from meaningful access to County-provided benefits. Plaintiffs are
8 therefore likely to succeed on the merits of their claims.

9 **B. Plaintiffs and Their Clients Face Irreparable Harm, and the**
10 **Balance of Hardships Tips Sharply in Their Favor**

11 Unless enjoined by this Court, Defendants will continue to enforce their
12 mandatory in-person GR application policy, causing irreparable harm to persons
13 with mental disabilities, including Plaintiffs' clients. It is beyond dispute that
14 irreparable harm results when Defendants prevent mentally disabled persons from
15 accessing GR benefits. *See, e.g., Goldberg v. Kelly*, 397 U.S. 254, 264 (1970)
16 (holding that denial of welfare "may deprive an eligible recipient of the very means
17 by which to live"; where a recipient "lacks independent resources, his situation
18 becomes immediately desperate."); *Beno v. Shalala*, 30 F.3d 1057, 1063-64 n.10
19 (9th Cir. 1994) ("Numerous cases have held that reductions in AFDC benefits, even
20 reductions of a relatively small magnitude, impose irreparable harm on recipient
21 families.").

22 To be eligible for GR, "a resident must have no income, no savings or
23 resources, and no financial support from family or friends." *Robbins v. Super. Ct.*,
24 38 Cal. 3d 199, 207 (1985). Thus, the California Supreme Court held that the
25 plaintiffs in *Robbins* would "suffer great and immediate harm from the denial" of
26 the requested preliminary injunction since they "would inevitably suffer substantial
27 hardship if forced to live" without GR benefits until the lawsuit was resolved on the
28 merits. *Id.* As one Housing Works case manager explains: the "slightest mistake"

1 which results in “losing their GR benefits means that they will be unable to pay
2 their rent or buy their next meal . . . GR income is the only money they have.”
3 Carson Decl. ¶ 18.

4 The attached declarations of Ivan Galvez and Charles Jarrett provide concrete
5 examples of the urgent irreparable harm that occurs each and every day that
6 Defendants prevent mentally disabled applicants from obtaining life-saving GR
7 payments. Because Defendants’ discriminatory policies denied them meaningful
8 access to GR, Ivan has been forced to live with abusive relatives in a one-room
9 shack without running water, and Charles has been forced to live under a bridge.
10 See Galvez Decl. ¶¶ 6-8; Jarrett Decl. ¶¶ 10, 21.

11 Moreover, as explained in Section II.F, Defendants’ illegal policy also forces
12 Plaintiffs Housing Works and ILC to divert their scant resources to addressing the
13 immediate harm to their mentally disabled clients seeking GR. This case is much
14 the same as *Woods v. Alexandria Hous. Partners, L.P.*, No. CV-07-08262 MMM
15 (JWJx), 2008 U.S. Dist. LEXIS 120289, at *86, *88 (C.D. Cal. May 22, 2008),
16 where the court held that an advocacy organization “face[d] the possibility of
17 irreparable harm” if the defendant harmed its clients, “because [the organization]
18 will be forced to assist them with numerous housing and social service needs,” and
19 further “its other . . . clients will be harmed as well, because [the organization]’s
20 limited resources will be diverted . . . if an injunction does not issue.” See also
21 *Caron Found. of Fla., Inc. v. City of Delray Beach*, 879 F. Supp. 2d 1353, 1373
22 (S.D. Fla. 2012) (court grants mandatory preliminary injunction in part because
23 “[f]rustration of a rehabilitation provider’s mission can cause irreparable harm.”);
24 *Stewart B. McKinney Found., Inc. v. Town Plan & Zoning Comm’n*, 790 F. Supp.
25 1197, 1208-09 (D. Conn. 1992) (plaintiff nonprofit foundation “would suffer
26 irreparable harm if a preliminary injunction did not issue” since “[m]onetary
27 damages would not adequately compensate the plaintiff for its inability to achieve
28 its purpose of providing housing . . . to needy HIV-infected persons”). Quite

1 recently, the court in *Step by Step, Inc. v. City of Ogdensburg*, No. 7:15-CV-925,
2 2016 WL 1319081, at *15-16 (N.D.N.Y. Apr. 5, 2016), issued a preliminary
3 injunction as it found that the city’s actions had deprived the plaintiff not-for-profit
4 corporation “of its ability to pursue its mission and to provide housing and services
5 to its mentally ill clients and this denial constitutes irreparable harm.” Here, too,
6 monetary damages will not adequately compensate Housing Works and ILC if the
7 Court does not grant the requested preliminary injunction.

8 In contrast to the irreparable harm faced by Plaintiffs and their disabled
9 clients, Defendants face only a minimal burden if prohibited from enforcing their
10 mandatory in-person GR application policy during the pendency of this lawsuit.
11 Notably, Defendants do not insist on in-person applications for the other three
12 major benefit programs that they administer, *i.e.*, CalFresh, CalWORKs, and Medi-
13 Cal. On the contrary, Defendants accept applications for all these programs
14 through the mail, by fax, online, and through community organizations and
15 partners. Thus, requiring Defendants to accept off-site applications for one
16 additional benefit program is unlikely to cause a significant burden.

17 **C. The Public Interest Favors Enforcement of the ADA and the Other**
18 **Anti-Discrimination Laws**

19 The last factor for this Court to consider is whether preliminary relief is in
20 the public interest. “In enacting the ADA, Congress demonstrated its view that the
21 public has an interest in ensuring the eradication of discrimination on the basis of
22 disabilities This public interest is served by requiring entities to take steps to
23 ‘assure equality of opportunity’ for people with disabilities.” *Enyart v. Nat’l*
24 *Conference of Bar Exam’rs, Inc.*, 630 F.3d 1153, 1167 (9th Cir. 2011) (citations
25 omitted). In *Enyart*, the Ninth Circuit held that the issuance of the preliminary
26 injunctions allowing a legally blind law school graduate to take the bar exam using
27 assisting software “served the public’s interest in enforcement of the ADA and in
28 elimination of discrimination on the basis of disability.” *Id.*

1 So, too, a preliminary injunction allowing destitute County residents with
2 mental disabilities to apply for GR without having to go to the DPSS offices serves
3 the public interest in enforcement of the ADA, the Rehabilitation Act and
4 California Government Code § 11135. The public has an interest in eliminating
5 discrimination on the basis of disability and in providing the County’s most
6 vulnerable residents with the GR benefits to which they are entitled.

7 **V. CONCLUSION**

8 For the foregoing reasons, this Court should issue a preliminary injunction
9 providing that, during the pendency of this litigation, Defendants shall be
10 prohibited from requiring mentally disabled individuals to submit their GR
11 applications in-person at DPSS offices.

12 Dated: June 9, 2016

Respectfully submitted,

13 LEGAL AID FOUNDATION OF
14 LOS ANGELES

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