

1 CLAUDIA MENJIVAR (SBN 291981)
2 CMenjivar@lafla.org
3 LEGAL AID FOUNDATION OF
4 LOS ANGELES
5 5228 Whittier Boulevard
6 Los Angeles, CA 90022
7 Telephone: (213) 640-3940
8 Facsimile: (213) 640-3911

9 ROBERT D. NEWMAN (SBN 86534)
10 rnewman@wclp.org
11 WESTERN CENTER ON LAW AND POVERTY
12 3701 Wilshire Boulevard, Suite 208
13 Los Angeles, CA 90010-2826
14 Telephone: (213) 235-2619
15 Facsimile: (213) 487-4727

16 ANNA RIVERA (SBN 239601)
17 anna.rivera@drlcenter.org
18 DISABILITY RIGHTS LEGAL CENTER
19 256 S. Occidental Boulevard, Suite B
20 Los Angeles, CA 90057
21 Telephone: (213) 736-1031
22 Facsimile: (213) 736-1428

23 ANNE RICHARDSON (SBN 151541)
24 ARichardson@publiccounsel.org
25 PUBLIC COUNSEL
26 610 S. Ardmore Avenue
27 Los Angeles, CA 90005
28 Telephone: (213) 385-2977
Facsimile: (213) 385-9089

(Additional counsel listed on following page)

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)

NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
INJUNCTION

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

1 Additional counsel:

2 YOLANDA ARIAS (SBN 130025)
YArias@lafla.org
3 BARBARA SCHULTZ (SBN 168766)
BSchultz@lafla.org
4 RYAN BRADLEY (SBN 211255)
RBradley@lafla.org
5 MATTHEW CLARK (SBN 233736)
MClark@lafla.org
6 LEGAL AID FOUNDATION OF LOS ANGELES
5228 Whittier Boulevard
7 Los Angeles, CA 90022
Telephone: (213) 640-3923
8 Facsimile: (213) 640-3911

9 ANTIONETTE D. DOZIER (SBN 244437)
adozier@wclp.org
10 WESTERN CENTER ON LAW AND POVERTY
3701 Wilshire Boulevard, Suite 208
11 Los Angeles, CA 90010-2826
Telephone: (213) 235-2619
12 Facsimile: (213) 487-4727

13 KARA JANSSEN (SBN 274762)
Kara.Janssen@drlcenter.org
14 DISABILITY RIGHTS LEGAL CENTER
256 S. Occidental Boulevard, Suite B
15 Los Angeles, CA 90057
Telephone: (213) 736-1031
16 Facsimile: (213) 736-1428

17 DEEPIKA SHARMA (SBN 256589)
dsharma@publiccounsel.org
18 SARAH TRUESDELL (SBN 258642)
struesdell@publiccounsel.org
19 PUBLIC COUNSEL
610 S. Ardmore Avenue
20 Los Angeles, CA 90005
Telephone: (213) 385-2977
21 Facsimile: (213) 385-9089

22 CHARLES S. BARQUIST (SBN 133785)
CBarquist@mofocom
23 RYAN MALLOY (SBN 253512)
RMalloy@mofocom
24 HERIBERTO ALVAREZ (SBN 307048)
halvarez@mofocom
25 MATTHEW HOFER (SBN 307055)
mhofer@mofocom
26 MORRISON & FOERSTER LLP
707 Wilshire Boulevard
27 Los Angeles, CA 90017-3543
Telephone: (213) 892-5200
28 Facsimile: (213) 892-5454

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on Monday, July 11, 2016, at 8:30 a.m., or as soon thereafter as the matter may be heard, in Courtroom 10, United States District Court for the Central District of California, located at 312 North Spring Street, Los Angeles, California, Plaintiffs Housing Works and Independent Living Center of Southern California, Inc. will move the Court for an order that pending final resolution of this case, Defendants County of Los Angeles, County of Los Angeles Board of Supervisors, and Los Angeles County Department of Public Social Services (“DPSS”), their respective successors, agents, employees and those acting in concert therewith are prohibitively enjoined from:

(a) requiring persons with mental and/or cognitive disabilities to apply for General Relief in-person at DPSS offices without any consideration of their disabilities, and

(b) failing to make reasonable accommodations, such as U.S. mail, facsimile transmission, email, online and/or home visits, for persons with mental and/or cognitive disabilities so that they can apply for General Relief without having to go to the DPSS offices.

While motions for preliminary injunction are not subject to the requirements of L.R. 7-3, this motion is made following the conference of counsel which took place on May 25, 2016.

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

This motion is based on this notice of motion, the accompanying memorandum of points and authorities, the declarations, exhibits, request for judicial notice and proposed order filed concurrently herewith in support of this motion, the pleadings, records and papers on file with the Court, and such additional evidence and argument as may be presented at the hearing on this motion.

DATED: June 9, 2016

Respectfully submitted,

LEGAL AID FOUNDATION OF
LOS ANGELES

By: /s/ Matthew G. Clark
Matthew G. Clark

WESTERN CENTER ON LAW
AND POVERTY

By: /s/ Robert D. Newman
Robert D. Newman

MORRISON & FOERSTER LLP

By: /s/ Charles S. Barquist
Charles S. Barquist

PUBLIC COUNSEL

By: /s/ Anne Richardson
Anne Richardson

DISABILITY RIGHTS LEGAL CENTER

By: /s/ Anna Rivera
Anna Rivera