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Attorneys for Plaintiffs

10
 11
 12 UNITED STATES DISTRICT COURT
 13 SOUTHERN DISTRICT OF CALIFORNIA

14 ELIZABETH MIRABELLI, an individual,
 15 and LORI ANN WEST, an individual,

16 Plaintiffs,

17 v.

18 MARK OLSON, in his official capacity as
 19 President of the EUSD Board of
 20 Education, et al.,

21 Defendants.

Case No.: 3:23-cv-0768-BEN-WVG

**Declaration of Plaintiff Lori Ann
 West in Support of Motion for a
 Preliminary Injunction**

Judge: Hon. Roger T. Benitez
 Courtroom: 5A
 Hearing Date: June 26, 2023
 Hearing Time: 10:30 a.m.

1 I, Lori Ann West, declare and state as follows:

2 1. I am a plaintiff in this action. I am a primary school teacher employed by
3 the Escondido Union School District. I have been teaching middle-school Physical
4 Education at Rincon Middle School in Escondido since 1999. The matters discussed
5 below are based on my own personal knowledge. I could and would testify to them if
6 called upon to do so in court.

7 **REACTION TO THE LAWSUIT**

8 2. I am submitting this declaration to update the testimony that I provided
9 in the verified complaint. As stated in the complaint, I have been teaching physical
10 education for 32 years—since 1991—and have been teaching with EUSD for 29
11 years. I have a juris doctorate that I obtained from Thomas Jefferson School of Law
12 and was twice named the Escondido Elementary Educators Association Teacher of
13 the Year. I currently teach eighth grade Physical Education.

14 3. Also as stated in the complaint, I am a devout Christian. The teachings
15 of my faith are extremely important to me. Because of my faith, I have always sought
16 the best for my students. For nearly 30 years, I have done everything I can to make a
17 positive impact in the lives of young people. To me, a student’s sex, sexual
18 orientation, race—or any other category—is irrelevant. What matters to me is the
19 hope that I can teach them how to take care of their physical health and be life-long
20 athletes.

21 4. When the Escondido Union School District first advised me of its new
22 gender identity policies, I became worried. My first thought was that the policies
23 were not good for the children. But I was also afraid of bullying and retaliation if I
24 spoke up. Ultimately, however, I decided that I had a moral duty to stand up and fight
25 for these children and their parents. Since I filed this lawsuit on Thursday, April 27,
26 2023, I have experienced some harassment and retaliation—although not nearly as
27 bad as Elizabeth Mirabelli.

28 ///

1 5. First, on Thursday, April 27—the day the lawsuit was filed—a Rincon
2 Middle School special education teacher called me out during the 2:30 p.m. eighth
3 grade team meeting. At the meeting, he brusquely and harshly said words to the
4 effect of: “Lori, I just saw your name in the news. Is this true?” I responded simply
5 “Yes.”

6 6. The next day, April 28, that special education teacher sent an email to
7 the “All Rincon” email address that emails the entire staff. In that email, he included
8 a link to a webpage from the ACLU titled “LGBTQ Student Rights.” I was not
9 teaching class on Friday, April 28, but I received my emails. A true and correct copy
10 of a printout of that webpage is attached as **Exhibit 38**.

11 7. On Monday, May 1, I discovered that somebody had left a pamphlet on
12 my desk titled, “Know Your Rights: LGBTQ Student Rights at School,” published
13 by the ACLU of California. Although this would seem related to the special
14 education teacher’s prior actions, my desk is in the Girl’s Locker Room. So either
15 someone unrelated to him placed the pamphlet on my desk or he asked a female to do
16 so. A true and correct copy of photos showing my desk with the pamphlet on it are
17 attached as **Exhibit 39**.

18 8. For the rest of the week, I noticed that many of my fellow teachers were
19 wearing Rainbow Pride colors—either as part of their clothing itself or in the form of
20 ribbons, pins, or lanyards. This appears to me to clearly be a concerted effort by
21 various teachers to protest this lawsuit.

22 9. It also appears that those teachers wear the “Equality” shirt mentioned
23 by Elizabeth every Thursday specifically because we have our staff meetings on
24 Thursdays. That is the only day where I would see the teachers. I rarely see any other
25 teachers during the school day because I stay in the P.E. building area all day, which
26 has its own break room with a microwave and a refrigerator. It is known by all that I
27 do not eat lunch in the main break room where all the other teachers eat.

28 ///

1 10. These new efforts by teachers (since the lawsuit was filed) to make a
2 large showing with the “Equality” t-shirt and Rainbow Pride Colors seem to be in
3 response to this case, and make me feel like a target.

4 11. On Monday, May 8, I started receiving emails from the San Diego
5 LGBT Community Center, www.thecentersd.org, at my work email. I immediately
6 wrote back and asked why I was receiving the email. The response I received was that
7 “Our records show that this email was signed up to our email list via an online form
8 on our website.”

9 12. My work email is not public, so I can only assume that one of my fellow
10 teachers signed me up to receive email blasts. I have since unsubscribed. I also
11 confirmed with Elizabeth that she was signed up to receive the emails, and she has
12 unsubscribed. A true and correct copy of the emails I received are attached as
13 **Exhibits 40 and 41.**

14 13. I also received the email through which the band teacher circulated the
15 video she took of her students singing the song “This is Me.” At that time, I noticed
16 that the band teacher listed preferred pronouns in her signature block, and that she
17 included a hyperlink in her signature block to explain why. The website hyperlinked
18 was www.pronouns.org. A true and correct copy of a printout of the website
19 hyperlinked is attached as **Exhibit 42.**

20 14. In addition, on Thursday, May 11, we had our weekly staff meeting. The
21 teachers that I have previously mentioned as wearing “Equality” t-shirts all sat
22 together at one table. At that meeting, I also received Rincon Middle School’s
23 “Bulldog Strong Award.” We have three monthly awards that are passed from one
24 teacher to another at the monthly meetings. Before presenting the award, another
25 P.E. teacher read a beautiful statement about me.

26 15. As part of common courtesy, the staff usually claps after each award
27 statement is read. But at least one-half of the staff did not clap when my name was
28 read and had annoyed, irritated, and disgusted looks on their faces. Overall, the staff

1 meeting was uncomfortably awkward due to some staff members' behavior.
2 Afterwards, another teacher mentioned the awkwardness to me, so I was not the only
3 one to notice it.

4 16. Finally, on Friday, May 12, I was informed by my students that the band
5 teacher had placed new pro-transgender messages in her window. So I went to go
6 take a look and take some pictures. While I was taking pictures of the new posters,
7 the Rincon Middle School special education teacher that I previously mentioned
8 approached me and asked whether I was "looking for the band teacher." At the time,
9 I was standing at least twelve feet from the band room door (and not knocking on the
10 door). I told him "No," but he kept standing about fifteen feet away from me.
11 Shortly thereafter, the band teacher returned to her classroom door, threw it open,
12 and asked me, "Do you want to come in my classroom and take pictures?" I calmly
13 declined her invitation and continued taking pictures of the new posters. True and
14 correct copies of these photos are attached as **Exhibit 43**.

15 17. In light of the above, I also was offered the opportunity by the Escondido
16 Union School District to go on paid administrative leave, all the way back on
17 Thursday, May 4. I declined because I want to participate in my eighth grade
18 students' graduation and provide them with their end-of-year awards. I love all of my
19 students, and every year I am very proud to send my students on to high school. I do
20 not want to miss that graduation.

21 18. But I am worried about what might happen next year. This year, I know
22 each of my students very well and am confident that my presence will not be
23 distracting to their education, but a benefit. But there is no way to know what group
24 of students I will get next year—including potentially the disruptive seventh graders
25 that Elizabeth has been teaching.

26 ///

27 ///

28 ///

EXHIBIT 38



When you're at school, you have the right to be treated fairly and with respect by other students and all school employees, including teachers, the principal, custodians, and bus drivers. You have the right to be free from bias, harassment and discrimination; to feel comfortable; and, most importantly, you have the right to be yourself!

KNOW YOUR RIGHTS:

You Have the Right to Be Yourself

At times, school can be rough for any student, but it can be even harder for lesbian, gay, bisexual, transgender or questioning youth, or those perceived as LGBTQ. We're lucky to live in California, where laws are among the most progressive in the country and many groups exist to actively support LGBTQ youth. Unfortunately, these laws

often only cover public or charter schools, not private or religious schools. But sometimes the laws protect students in non-religious private schools as well.

Knowing your rights is the first step in making sure you're treated equally, and youth across the state are taking steps to uphold their rights and be themselves.

This guide will show you what the law says about your rights in school, allowing you and your friends to take the lead in making the future of LGBTQ students as bright and fair as possible.

Harassment of LGBTQ students

Bullying, physical threats, hate-graffiti or name-calling of LGBTQ students is harassment, and is no joke. The good news, however, is that California has laws designed to help and protect LGBTQ youth.

The law is on your side. Public, charter, and non-religious private schools that receive state or federal funding are legally required to protect against harassment of LGBTQ students. Sections 200-220 of the California Education Code say that schools must protect students from different kinds of bias and discrimination, including harassment based on actual or perceived sexual orientation, gender identity, or gender expression. This means that you can't be harassed for being LGBTQ, for people thinking you are LGBTQ, or for having friends or family members who are LGBTQ. It also means that transgender and gender non-conforming students can't be harassed for gender-related appearance and behavior, such as a boy wearing a skirt or makeup. School administrators can't just ignore anti-LGBTQ harassment or discrimination of students by saying that such students should "expect" to be harassed or have brought the harassment upon themselves by being open about their gender identity or sexuality. Under Education Code Sections 234-234.5, administrators, faculty and staff are required to intervene when they witness discrimination, harassment or bullying if they can do so safely. In addition, both the

California and U.S. Constitution guarantee all students equal protection under the law.

Unfortunately, harassment still happens. For example, Rochelle Hamilton, a lesbian student from Vallejo, CA, came to the ACLU for help after she was harassed repeatedly by staff at her high school. Rochelle fought for her rights and won. At her school today, every teacher and student attends anti-harassment training and the school district has issued clear guidelines about how LGBTQ students can report harassment to prevent it from happening again in the future.

Know your school policy and how to make complaints. If you're being harassed or see it happening to someone else, you should report it immediately to the principal, a counselor, or another school official. Schools are legally required to have an anti-harassment policy, which must be clearly posted around the school, as well as a clear process for filing complaints. Schools are also responsible for preventing anyone from retaliating against you for reporting them and for keeping complaints strictly confidential.

Respecting Transgender and Gender Non-Conforming Students' Rights

California Education Code Section 220 prohibits discrimination on the basis of gender identity and gender expression—in addition to sexual orientation and other protected characteristics—in public schools or non-religious private schools. This means that a school must respect a transgender or gender non-conforming student's gender identity and/or expression. This includes calling you by your chosen name and gender pronoun, allowing you to dress in conformity with your gender identity or in gender non-conforming ways, and providing access to sex-segregated spaces such as restrooms and locker rooms, and activities such as gym class, in a way that corresponds to your gender identity. If you need or desire more privacy, your school must give you access to a single stall or gender-neutral restroom or changing area. Title IX and the U.S. Constitution provide similar protections by

prohibiting schools from stereotyping based on sex and from reinforcing stereotypical gender norms. For some good examples of the types of policies and practices schools should have in order to ensure transgender and gender non-conforming students are respected, check out

<http://www.casafeschools.org/csscmodelpolicy1209.pdf>

(<http://www.casafeschools.org/csscmodelpolicy1209.pdf>).

Freedom of Speech and Expression

Under the First Amendment of the U.S. Constitution, student expression is protected both on campus and outside the classroom and California's Constitution has even stronger freedom of speech protections. Section 48907 of the California Education Code also protects your right to discuss LGBTQ issues and topics in school. In addition, under Section 48950, no public school, charter school, or non-religious private high school can discipline you for talking about being LGBTQ or for discussing LGBTQ issues.

Of course, this doesn't mean that you can say whatever you want at any time—your speech isn't protected if it disrupts class time, if it's intended to encourage other students to break school rules, if it's obscene, or if it's something untrue about someone that could damage their reputation. Your school can also put some limits on where and when certain kinds of speech are allowed, but generally, if other students are allowed to speak at an event or in class at school, you should also be allowed to talk about LGBTQ issues.

Expressing Your Opinion. Your school is required to let you express your opinion, including about LGBTQ issues, on badges, buttons, armbands, bulletin boards, printed materials, petitions, and school publications.

T-shirts. If your school allows other students to wear t-shirts (or other types of clothes) that express their beliefs or political views, then the school can't tell you to take off something expressing your

opinion on LGBTQ issues. For example, in 2008, when a school in Big Bear Lake, CA, told senior Mariah Jimenez that she couldn't wear a t-shirt opposing Prop. 8, she stood up for her right to express her views, and the school apologized.

Class Projects. Your school also can't prevent you from doing a class project about an LGBTQ topic or book, so long as it meets the requirements of the assignment. For example, officials in Ramona, CA, tried to prevent sixth grader Natalie Jones from giving a report in class on Harvey Milk, the first openly gay elected official in California. This violated both federal and state freedom of speech protections, and with the help of the ACLU, Natalie was allowed to give her presentation in class like all the other students.

Prom. A large part of your freedom of expression is your right to be 'out' about your sexual orientation and/or gender identity. Nobody can censor who you are. This includes the right to bring a same-sex or gender nonconforming date to your prom or other school dances, to wear gender non-conforming clothing and to run for prom king or queen regardless of your sex. For example, Constance McMillen bravely stood up for both her right to bring her girlfriend to her school's prom and wear a tuxedo. With the ACLU's help, Constance established that students have the right to the prom date of their choice and to wear clothing that may not match up to norms for how boys or girls are "supposed" to dress.

Senior Portraits and Yearbook Photos. Your right to be yourself and dress in a gender non-conforming manner extends to what you wear in your school photos. For example, when Ceara Sturgis chose to wear a tuxedo for her senior yearbook photo, rather than the drape typically reserved for girls, her school excluded her picture from the yearbook. With the ACLU's help Ceara fought her school and won: Ceara's photo was added to the wall of senior photos at the school and her school improved its senior photo dress and anti-discrimination policies.

Generally, your school, whether public or private, doesn't have the right to 'out' you as LGBTQ to anyone without your permission, including your parents.

Under the California and U.S. constitutions, you have a protected right to privacy, which includes the right to keep your sexual orientation, gender identity or that you are transgender private (what courts call a “reasonable expectation of privacy”). In other words, you have the right to control to what extent and to whom you disclose highly personal information about your sexual orientation or gender identity. This means that even if you are “out” about your sexual orientation or gender identity at school, if you're not ‘out’ to your parents at home, and you can reasonably expect that they're not going to find out, then school staff can't tell your family that you are LGBTQ without your permission. Being open about your sexuality in school doesn't mean you automatically give up your right to privacy outside school.

However, under some limited circumstances your school can tell your parents something about your sexual orientation or gender identity—but only if they have a very good reason for doing so. It really depends on the circumstances. But they can't do it just to punish you, harass you, discriminate against you, or retaliate against you for complaining about something. For example, if you complain to the principal about a teacher making or allowing anti-LGBTQ comments in class, they can't then call your parents (or threaten to call them) and discuss anything about your actual or perceived sexual orientation. If your principal or teachers are threatening to “out” you to your parents and you need advice, give us a call. You should also explain your desire and your right to keep this information private.

Genders & Sexualities Alliance

Genders & Sexualities Alliances (GSAs) are student clubs that allow youth who are committed to equality to get together for activities and discussion.

GSAs are a great way to promote awareness of LGBTQ issues, and your school's support of a GSA could help the school to meet its obligation to protect students from anti-LGBTQ harassment and discrimination. Unfortunately, sometimes schools want to treat GSAs differently from other clubs, or even try to prevent students from starting one. This is wrong, and the law can help you.

Under the federal Equal Access Act, the First Amendment, and Section 220 of the California Education Code if your public school allows other non-curricular clubs to meet, it must also allow the GSA to meet and treat it like any other non-curricular student group. Non-curricular clubs are groups that aren't directly related to classes taught in school. For example, a Math Club is a curricular club, but a Snowboarding Club is non-curricular. The GSA must get the same privileges and access to meeting facilities as other non-curricular clubs. So if your school lets other clubs meet in classrooms and put up posters, then it has to let the GSA meet in classrooms and put up posters too.

If you're having difficulty forming a GSA, or feel that your GSA is being treated differently, you should raise your concerns with school officials and explain that the law requires the GSA be treated like other non-curricular clubs. Students in Madera, CA, negotiated with administrators who had been blocking the formation of a GSA club for over two years. They explained that the actions of the school violated the law and the club was finally allowed to develop. Student members of a GSA in Hesperia, CA fought back against school administrators who were censoring the GSA's announcements and posters, and not allowing them to screen movies about LGBTQ issues.

Starting a GSA Club. Starting a GSA is like starting any other club. Find out what your school's rules are and then follow those rules carefully. So long as the procedures for setting up the club are the same as for other non-curricular groups, it's okay.

Unbiased and LGBTQ Inclusive Instruction

Under California Education Code Section 51500, public schools can't provide instruction or sponsor activities that promote or reflect bias or discrimination against any person on the basis of their sexual orientation, gender identity, gender expression, or gender. This means that your school can't teach biased or discriminatory things about LGBTQ people or promote and reinforce gender stereotypes. For example, if your teacher discusses gender, sexual orientation, or families, they must discuss all genders, sexual orientations and family types. But your right to LGBTQ inclusive instruction does not end there. The FAIR Education Act (Ed. Code Sections 51204.5 and 60040) require that your school teach the role and contributions of LGBT Americans throughout history. For example, this might include discussion of Harvey Milk or famous transgender rights advocate, Theresa Sparks.

Under Sections 51930-51939 of the California Education Code, a sex ed class, like all other classes, can't reflect or promote bias against any person on the basis of their gender or sexual orientation. This means that your school's sex ed class or required HIV/AIDS instruction can't assume that all students are straight, or teach that being LGBTQ is different, unnatural, unhealthy, or wrong. Nor can your school use religious materials in their instruction. Abstinence-only sex ed is also not allowed in California. If your school has a sex ed class, then it must teach unbiased, comprehensive and accurate information, covering issues such as contraception and sexually transmitted infections. But even with the law on our side, we sometimes still have to fight for our rights; the ACLU of California is now challenging the Clovis Unified School District's abstinence only sex ed curriculum. Check our website for updates on the fight!

General Advice

If you suspect that your school is mistreating you because of your sexual orientation or gender identity, here are some basic rules to

help you out:

Be respectful and follow the rules!

Don't give your school any excuses for treating you badly by behaving badly yourself. This can make things harder to solve in the long run. Explain your grievances in a mature, respectable and respectful manner.

Document everything!

Keep a record of the 'Six Ws' each time you are harassed:

1. WHO was involved,
2. WHAT happened,
3. WHERE it happened,
4. WHEN it happened,
5. WHO you reported it to, whether they did anything about it, and when,
6. And if there were any WITNESSES.

Keep copies of anything in writing that you file with the school and be sure to write down the date (or even better, ask them to stamp it as received, with the date). Also take notes about any additional conversations you have with school administrators and any actions they take (or fail to take), and be sure to write down the dates for those too.

File a complaint!

Your school is required by law to have a clear and publicized process for filing complaints of harassment. If the process is not posted around campus like it should be, ask what this process is, and follow

it—you may also remind your school of their obligation to post these materials. Your school must keep your identity confidential and protect you from retaliation. The California Department of Education also has its own Discrimination Complaint Process, and information will be available on its website at:

www.cde.ca.gov/re/di/eo/complaint.asp
(<https://www.cde.ca.gov/re/di/eo/complaint.asp>)

Contact us

If you have more questions or if you think that your school isn't complying with the law, [please contact us](https://www.aclusocal.org/en/seeking-legal-help-aclu)
(<https://www.aclusocal.org/en/seeking-legal-help-aclu>).

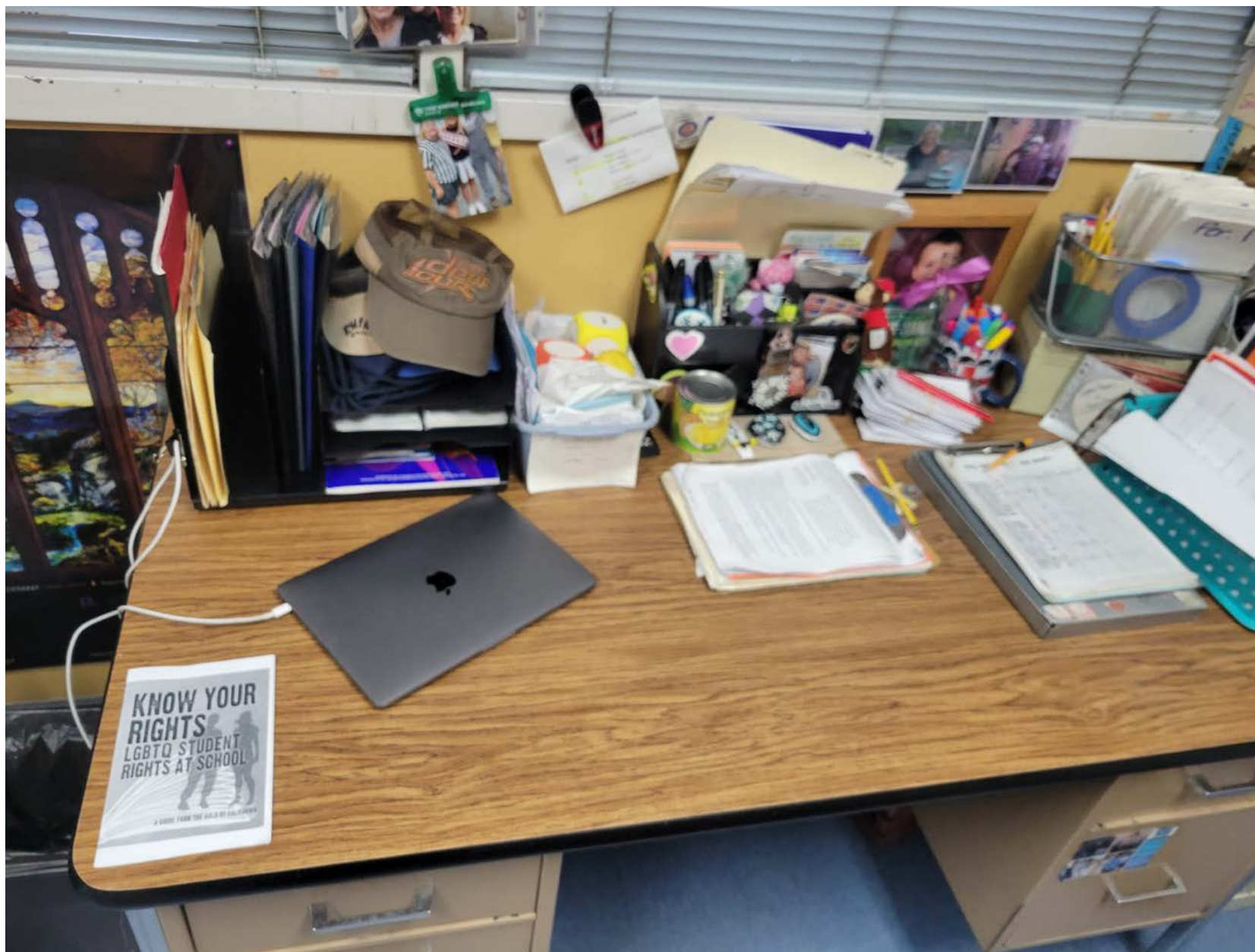
Always remember that you are the most important person in upholding your own rights, and that includes the right to be yourself!

Get more information at:

[myschoolmyrights.com](https://www.myschoolmyrights.com/lgbtq-student-rights/) (<https://www.myschoolmyrights.com/lgbtq-student-rights/>) and [aclusocal.org/education](https://www.aclusocal.org/education)
(<https://www.aclusocal.org/en/issues/education>)

This information is not intended as legal advice.

EXHIBIT 39



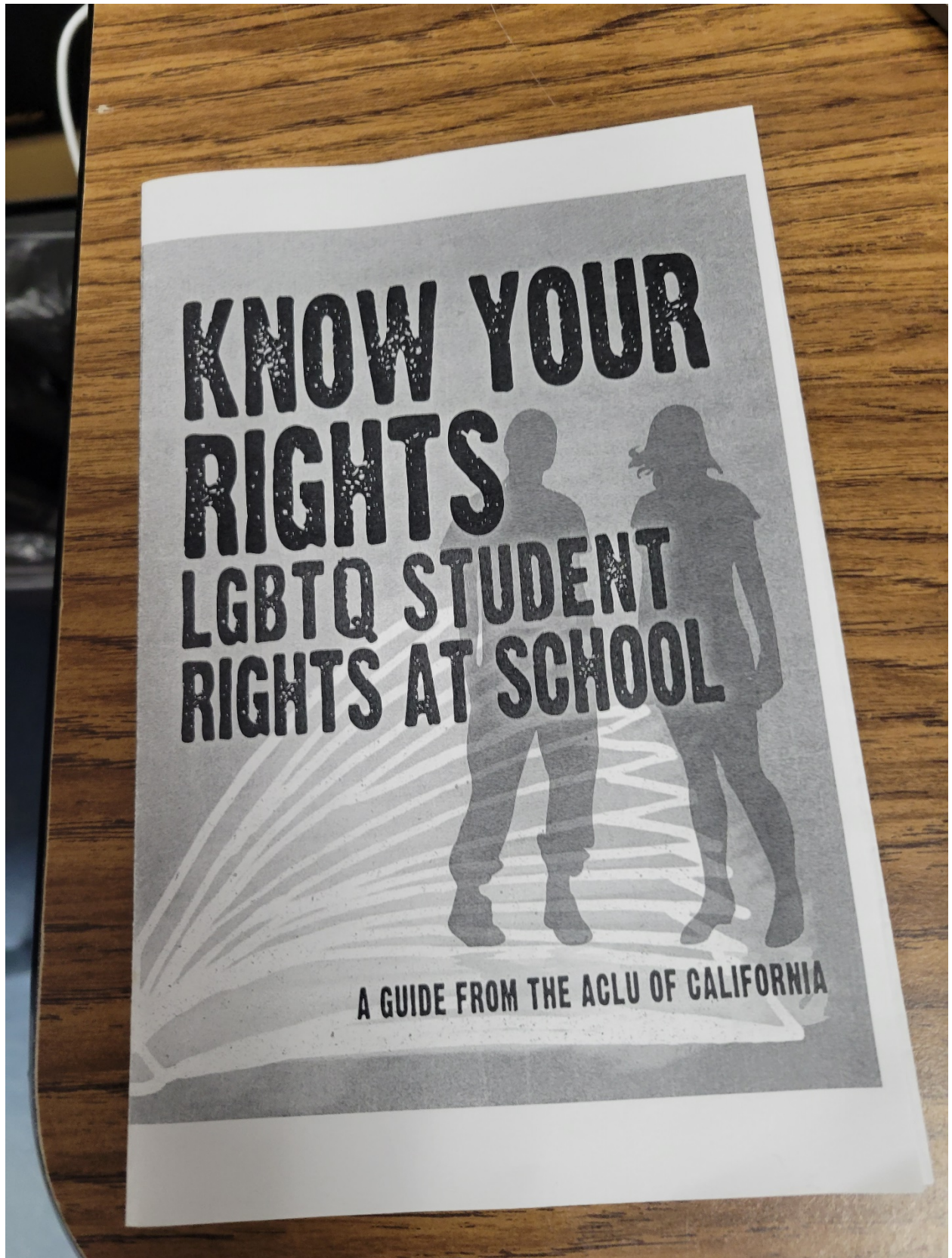


EXHIBIT 40

Jeffrey Trissell

From: Jeffrey Trissell
Sent: Tuesday, May 9, 2023 3:55 PM
To: Jeffrey Trissell
Subject: Your Legacy, Our Future: Join the Stonewall Society

----- Forwarded message -----

From: **The San Diego LGBT Community Center** <communications@thecentersd.org>
Date: Mon, May 8, 2023 at 6:31 PM
Subject: Your Legacy, Our Future: Join the Stonewall Society
To: <[REDACTED]>

[View this email in your browser](#)



The Center E-News | Monday, May 8, 2023



Your Legacy, Our Future Join The Stonewall Society



E-News Guest Author

Ian Johnson
(He/Him)
Senior Director of Development



Dear Center Community,

Today, LGBTQ+ people are facing serious threats to the gains we have made in our efforts to achieve equity and safety for our community. Each week we are seeing more laws being

introduced that threaten our progress, our well-being, and too often, our lives. We see our youth abandoned or vilified by their parents, guardians, and by society at large and we see supportive parents called unfit for doing exactly what a parent should be doing, supporting their LGBTQ+ children. And so often we only hear negative perspectives about our lives and community as if we do not have a rich cultural heritage, worthy of preservation and passing down to future generations. What makes San Diego so different from other places where LGBTQ+ communities have no safety net is that we have physical spaces to call our own. **With our growing network of LGBTQ+ places to meet and gather in community, The Center is an anchor for our community and culture.**



A group that allows The Center to continue its impact from generation to generation is [The Stonewall Society](#). This group lives its values by providing a future gift to The Center, building your legacy by providing support and ensuring the well-being of generations to come. **One way you can solidify your legacy and help create and preserve safe spaces for the next generation of LGBTQ+ people is by joining The Center's Stonewall Society.** There are a variety of ways to give that will fit your needs now while ensuring your legacy lives on in the lives of the LGBTQ+ people you will help through a Stonewall Society gift, including by designating The Center as a beneficiary in a financial account, a will or trust, possibly an IRA, stock gift, or retirement distribution. We highly encourage you to speak with a financial planner to talk through the many options.

One of our Stonewall Society members is Dr. Roger Cornell (he/him), a long-time San Diego resident. Dr. Cornell was raised in Hawaii, and completed his medical degree at Stanford University, and interned at New York Hospital, where Dr. Tony Fauci was his student. Dr. Cornell

worked at Scripps Clinic for 43 years. He's been a strong supporter of The Center and other local nonprofits, and we're excited that he has chosen to pledge such a special gift to The Center.



"The San Diego LGBT Community Center provides essential services to our community in an extraordinary way," says Dr. Cornell. "I felt secure knowing The Center earned a 4-star Charity Navigator score, and was equally impressed with The Center's [Annual Report](#). I am proud to have made an irrevocable pledge to The Center."

In helping to guarantee The Center's future with a gift through a trust, bequest, or other planned gift, your legacy will live on in the tens of thousands of people right here in San Diego who rely on The Center every year.

When you join The Stonewall Society, you can make your pledge with confidence that your donation will be stewarded with the utmost care and respect. If you have named The Center to receive such a gift, or to learn more about the Stonewall society, [visit our website](#) or contact me directly at ijohnson@thecentersd.org.

To a bright future,

Ian Johnson (He, Him)

Senior Director of Development

Join Us *This Friday* For The 15th Annual Harvey Milk Diversity Breakfast



Every year around Harvey Milk's birthday, more than 1,000 diverse San Diegans come together to celebrate Harvey Milk and his vision of civil rights and equality for all. This Friday, celebrating his 93rd birthday, we are excited to be gathering to honor Harvey Milk's legacy in a special way that is not to be missed! After three years, the in-person [Harvey Milk Diversity Breakfast](#) is back and better than ever! This is a fabulous opportunity to come together in support of community! **Join us for the Annual Harvey Milk Diversity Breakfast on Friday, May 12 at the Hilton San Diego Bayfront.**

Last chance to purchase your table or tickets



The poster features a dark blue background with a purple gradient at the bottom. In the top left corner, there is a portrait of Harvey Milk and the text "[15TH ANNUAL] HARVEY MILK DIVERSITY Breakfast". To the right, the word "HONOREES" is written in large, white, bold letters. Below this, five honorees are listed, each with a small portrait or logo to their left. The honorees are: Lorri L. Jean (Former CEO, Los Angeles LGBT Center, 2023 Harvey Milk Lifetime Achievement Award), Mayor Jackie Biskupski (Former Mayor of Salt Lake City, 2020 Harvey Milk Lifetime Achievement Award), San Diego Loyal Soccer Club (2023 Harvey Milk Champion of Equality Award), Paris Quion (2023 Harvey Milk Community Service Award), and Christynne Lili Wrene Wood (2023 Harvey Milk Inspiration Award). At the bottom left, the event details are listed: "FRIDAY, MAY 12, 2023 7:30AM - 9AM" and the website "THECENTERSD.ORG/HMDB". At the bottom right is the logo for "THE CENTER", which depicts a stylized building.

HONOREES

LORRI L. JEAN (she/her)
Former CEO, Los Angeles LGBT Center
2023 Harvey Milk Lifetime Achievement Award

MAYOR JACKIE BISKUPSKI (she/her)
Former Mayor of Salt Lake City
2020 Harvey Milk Lifetime Achievement Award

SAN DIEGO LOYAL SOCCER CLUB
2023 Harvey Milk Champion of Equality Award

PARIS QUION (she/her)
2023 Harvey Milk Community Service Award

CHRISTYNN LILI WRENE WOOD (she/her)
2023 Harvey Milk Inspiration Award

FRIDAY, MAY 12, 2023
7:30AM - 9AM
THECENTERSD.ORG/HMDB

THE CENTER

Celebrating API Heritage Month

API HERITAGE MONTH 2023
Community Programming



FRI 5/19

Everything, Everywhere,
All at ABASD Gala
5:30pm-9:00pm
Hilton San Diego Bayfront
@abasandiego



SUN 5/21

The 7th Annual Fundraising Gala
Reflections of Resistance and Resilience
11:00am-7:00pm
United Domestics Workers
@asiansolidaritycollective

 **THE CENTER**

Asian Pacific Islander Heritage Month is a time to celebrate the diverse history and tremendous contributions of our API community. The Center is proud to share local events put on by our community partners throughout this month!

Veterans Wall of Honor Nominations Now Open



The Benjamin F. Dillingham, III and Bridget Wilson LGBT [Veterans Wall of Honor](#) recognizes LGBTQ veterans with ties to San Diego who served under anti-LGBTQ policies, preventing their ability to serve, and serve safety and openly, as well as those who have served after the ending of those policies. These veterans have taken the oath to serve our country and have done so honorably, and with distinction, acting as role models in advancing equality. The LGBT Veterans Wall commemorates these veterans' lives in hopes that their courage, bravery and sacrifices will continue to inspire future generations.

[The 2023 nomination form is now open](#) until June 30, 2023. Please be sure to review the candidate criteria on our website prior to submitting a nomination.

[Nominate an LGBTQ Veteran](#)

Make A Difference In Our Community!



Are you looking to make a difference, make new friends, *and* give back to the LGBTQ+ community? Why not become a Center Volunteer - there truly is an opportunity for everyone.

[Click here to learn more and sign up.](#)



We want to celebrate you and all the time you have donated to our community! On Monday, May 22, 2023, we will be hosting a [Volunteer Appreciation Party](#) at Park & Rec from 5pm-9pm. Volunteers will receive one complimentary drink, and appetizers will be available. All volunteers in attendance will also receive a ticket for a chance to win some amazing prizes in our opportunity drawings. To RSVP, please click [here](#).



Join us for our [Affirmed Clothing Drive](#) dedicated to our amazing transgender community! Let's come together and fill our Affirmed program inventory with love, care, and plenty of gender affirming goodies! Friday, May 19, 2023, 1pm-4pm, in The Center's Parking Lot.

Free Food Resources At The Center



At The Center, we believe that food is a human right and we want to be sure everyone in our community has access to nutritious food. Our programs include:

- The [Neighborhood Food Distribution](#), part of the Community Cares Project of the [Jacobs & Cushman San Diego Food Bank](#), is free and open to all. Held on the first Tuesday of each month from 8am - 10am. **The next Neighborhood Food Bank is Tuesday, June 6, 2023.**
- The [Senior Food Bank](#), held in partnership with [Jacobs & Cushman San Diego Food Bank](#), is free and open to low-income seniors 60 and older. Held on the 4th Tuesday of each month from 1pm - 3pm. **The next Senior Food Bank is Tuesday, May 23, 2023.**

Both Food Banks have a walk-up or drive-up option for safety. If you, or someone you know needs access to food, know that The Center is here for you. Please reach out to Sarah (she/her) at 619.692.2077 x 214 or smerkbenitez@thecentersd.org.

HIV/HCV and STI Screenings: **FREE AND CONFIDENTIAL**



Having sex?

Free STI Screenings at The Center
Monday-Friday
11am-6pm by appointment
Walk-Ins: based on availability
Email bethegeneration@thecentersd.org
or call (619) 692-2077

BTC
THE CENTER



¿Estás teniendo sexa?

Pruebas SIN COSTO de
infecciones de transmisión sexual
lunes a viernes
11am-6pm con cita
Sin cita: por favor llamanos
¡Contáctanos para hacer tu cita!
bethegeneration@thecentersd.org o (619) 692-2077

SLG
THE CENTER

It's time for self-care with our free, confidential HIV/HCV testing and STI screenings in a compassionate and sex-positive environment with connections to health care and resources.

Make your appointment today - call us at 619.692.2077 or email bethegeneration@thecentersd.org to make an appointment. Monday-Friday 11am-6pm by appointment. Walk-ins will be accepted based on availability.

Please note that we do not offer MPOX testing as part of our testing services, please call 211 for testing assistance.

NEXUS

RECEIVE UP TO \$360

**ARE YOU:
18 YRS OR OLDER &
LATINO/HISPANIC IDENTIFIED
MALE WHO HAS SEX WITH MEN**

ENROLL TODAY!

Contact
Juan Esparza (he/they)
619-837-3187
+52-467-102-2845
jesparza@thecentersd.org

WHAT IS INVOLVED?
* YOU WILL ATTEND 3 STUDY VISITS, AND YOUR INVOLVEMENT WILL LAST FOR 12 MONTHS
* YOU WILL COMPLETE A SURVEY AT EACH VISIT AND AN HIV TEST AT THE FIRST VISIT
* STUDY VISITS CAN TAKE PLACE AT THE CENTER, SAN YSIDRO, UCSF, OR ZOOM.
* RECEIVE UP TO \$360 FOR YOUR TIME AND TRAVEL.

BTG **SLG**

NEXUS

RECIBE HASTA \$360

ERES:

- MAYOR DE 18 AÑOS
- LATINO/HISPANO QUE SE IDENTIFICA COMO HOMBRE QUE TIENE SEXO CON HOMBRES

¿QUÉ ESTÁ INVOLUCRADO?

- * ASISTIRÁS A 3 VISITAS DE ESTUDIO Y TU PARTICIPACIÓN DURARÁ 12 MESES.
- * COMPLETARÁS UNA ENCUESTA EN CADA VISITA Y UNA ENCUESTA DE VIH EN LA PRIMERA VISITA.
- * LAS VISITAS DE ESTUDIO SE PUEDEN HACER EN THE CENTER, SAN YSIDRO, UCSF, O ZOOM.
- * RECIBE HASTA \$360 POR TU TIEMPO Y VIAJE.

INSCRÍBETE HOY

Contact
Juan Esparza (he/they)
619-837-3187
+52-467-102-2845
jesparza@thecentersd.org

BTG **SLG**



This week is National Prevention Week (NPW), a time to promote the world we want to see—where prevention helps keep people and communities healthy and safe. [#NationalPreventionWeek](#) is a national public education platform showcasing the work of communities and organizations across the country dedicated to raising awareness about the importance of substance misuse prevention and positive mental health.

Our mission at The Center is to enhance and sustain the health & well-being of our vibrant LGBTQ community - this includes sexual health, physical health, mental health and everything in between. We are here for you!

- Learn more about NPW: <https://www.samhsa.gov/prevention-week/about>
- Learn more about The Center's Behavioral Health Services: thecentersd.org/behavioral-health-services/
- Learn more about The Center's Sexual Health and Wellness Services: <https://thecentersd.org/bethegeneration/>

- Find a Center discussion or support group to attend: <https://thecentersd.org/support-groups/>

What's New At The Center



The Center moves to Phase 4 of Reopening

In Phase 4, we will no longer be verifying proof of COVID vaccination for anyone who enters The Center, and masks will now be optional at all of our sites; masks are still strongly encouraged.

Room Rentals at The Center

Room rentals are back at The Center and there are many options to choose from! To get more information, [please visit our website](#). We hope to see you and your group soon!

Center Library is Open Monday-Friday, 10am-2pm

The Center's Library is now open! Get your library card, check out one of the LGBTQ+ books from our vast collection, or get a recommendation from one of our library volunteers!



THE CENTER

2023
PROFESSIONAL
DEVELOPMENT FAIR
AT THE CENTER

FRIDAY
02 JUNE

4-6
PM

The Center
Auditorium
3909 Centre St.

Join us for an empowering Professional Development Fair specifically crafted for the LGBTQ+ community.

- Attend some helpful and informative workshops.
- Meet a diverse group of LGBTQ-affirming organizations that are all currently hiring.
- Feel empowered and supported as you grow professionally.

Register below

bit.ly/pd-fair-2023
smerkbenitez@thecentersd.org

If you are an organization that is interested in tabling, please contact: smerkbenitez@thecentersd.org

Join us for an empowering Professional Development Fair specifically crafted for the LGBTQ+ community.

- Attend some helpful and informative workshops.
- Meet a diverse group of LGBTQ-affirming organizations that are all currently hiring.
- Feel empowered and supported as you grow professionally.

Register here: bit.ly/pd-fair-2023

If you are an organization that is interested in tabling, please contact: smerkbenitez@thecentersd.org

Where: The Center's Auditorium, 3909 Centre St.

When: Friday, June 2, 2023, 4-6pm

50+ and Better Together - Senior Services At The Center



THE CENTER

Returns to The Center
May 10, 2023

50+ & Better Together Ageless Art Group

Express your creativity and explore your artistic expression in the **Ageless Art Group!** All skill levels and mediums are welcomed. Bring your supplies and let's have fun! This is a drop-in group, no registration needed.

*Please note, this event is free but art supplies are not provided. All participants must provide their own materials.

In Person
3909 Centre Street

Wednesdays
1:00 PM - 4:00 PM

FOR MORE INFORMATION
seniors@thecentersd.org
(619) 692-2077 Ext. #147



THE CENTER

50+ & Better Together Dinner with Friends

Connect with LGBTQ+ friends at a local restaurant for a fun community-organized dinner meet-up. Volunteer host, Omar (he/him) will be there to greet all participants. We can't wait to see you!

The Red Door
741 W. Washington Street
San Diego, CA 92103

Saturday, May 20, 2023
5:00 PM

* Please note that attendees will pay for their own meal



FOR MORE INFORMATION
seniors@thecentersd.org
(619) 692-2077 Ext. #147

RSVP
<https://bit.ly/maydinnerfriends>



THE CENTER

50+ & Better Together GAME DAY

Join us for an afternoon of fun games and conversation.

Join a game of Canasta, bring your own games, or play one of the many games we have on hand at The Center. Meet new people and have fun!

In Person
The Center's Library
3909 Centre Street

Every Tuesday
12:00 PM - 3:30 PM

FOR MORE INFORMATION
seniors@thecentersd.org
(619) 692-2077 Ext. #147



THE CENTER

50+ & Better Together Feeling Fit

Free low-impact exercise classes!

In Person
3909 Centre Street

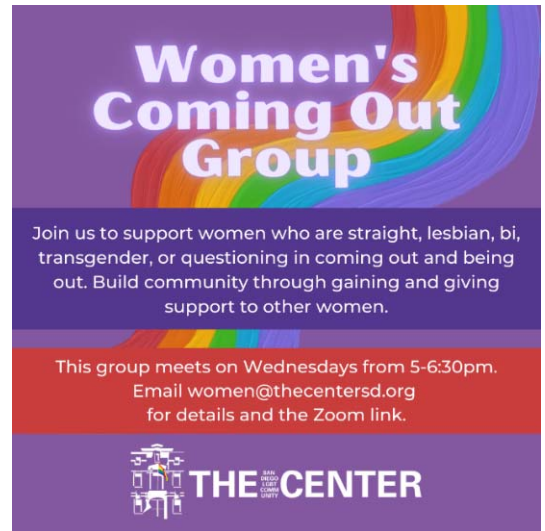
Mondays, Wednesdays, & Fridays
1:30 PM - 2:30 PM



FOR MORE INFORMATION
seniors@thecentersd.org
(619) 692-2077 Ext. #147

Find our full list of events, programs, and services for [50+ & Better Together Senior Services](#) on our website.

Women's Services At The Center



We offer support and discussion groups for women, and more! Check out our [Women's Services at The Center](#) page on our website.

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Email truncated

EXHIBIT 41

Jeffrey Trissell

From: Jeffrey Trissell
Sent: Thursday, May 11, 2023 2:54 PM
To: Jeffrey Trissell
Subject: UNSOLICITED EMAIL SENT TO ME- WHY?

From: **Amanda Lopez (She/Her)** <[REDACTED]@thecentersd.org>
Date: Tuesday, May 9, 2023
Subject: UNSOLICITED EMAIL SENT TO ME- WHY?
To: Lori West <[REDACTED]@eusd.org>

Hi Lori – Our system shows that the email address [REDACTED]@eusd.org was signed up to our email list via that form on May 2, 2023 at 3:45pm. That is the only information we have. Thank you!

Best,

--

Amanda Lopez

Communications and Marketing Manager

The San Diego LGBT Community Center

Pronouns: she/her/hers



From: Lori West <[REDACTED]@eusd.org>
Sent: Tuesday, May 9, 2023 10:52 AM
To: Amanda Lopez (She/Her) <[REDACTED]@thecentersd.org>
Subject: Re: UNSOLICITED EMAIL SENT TO ME- WHY?

Can you give me any info about this? What date & time? What email address did this come from?

On Tue, May 9, 2023 at 10:50 AM Lori West <[REDACTED]@eusd.org> wrote:

Thanks for assistance! HAVe a great day! :)

On Tue, May 9, 2023 at 10:47 AM Amanda Lopez (She/Her) <[REDACTED]@thecentersd.org> wrote:

Hi Lori –

This is the online form: <https://bit.ly/emails-centerSD>

Have a wonderful day!

Best,

--

Amanda Lopez

Communications and Marketing Manager

The San Diego LGBT Community Center

Pronouns: she/her/hers



From: Lori West <[REDACTED]@eusd.org>

Sent: Tuesday, May 9, 2023 10:41 AM

To: Amanda Lopez (She/Her) <[REDACTED]@thecentersd.org>

Cc: Communications <Communications@thecentersd.org>

Subject: Re: UNSOLICITED EMAIL SENT TO ME- WHY?

PLEASE send me that online form. I never signed up for this. I feel that a co-worker might have added my name to your list. I am in the middle of a lawsuit and this will be included in our evidence at trial.

On Tue, May 9, 2023 at 10:38 AM Amanda Lopez (She/Her) <[REDACTED]@thecentersd.org> wrote:

Hi Lori – Our records show that this email was signed up to our email list via an online form on our website. We sincerely apologize for any confusion or inconvenience. You have been unsubscribed from our emails moving forward.

Have a great day!

Best,

--

Amanda Lopez

Communications and Marketing Manager

The San Diego LGBT Community Center

Pronouns: she/her/hers



From: Lori West <[REDACTED]@eusd.org>
Sent: Tuesday, May 9, 2023 10:35 AM
To: Communications <Communications@thecentersd.org>
Subject: UNSOLICITED EMAIL SENT TO ME- WHY?

Hello,

Why are you sending me unsolicited information to my place of business? It appears that you are trying to harass me. Please do not send this nonsense to me again!

Lori West

--

Lori West

P.E. Teacher

Rincon Middle School

EXHIBIT 42

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

PRONOUNS MATTER

LEARN MORE (/WHAT-AND-WHY)

**WHAT ARE PERSONAL PRONOUNS AND WHY DO THEY
MATTER? (/WHAT-AND-WHY)**

HOW DO I USE PERSONAL PRONOUNS? (/HOW)

WHAT IF SOMEONE MAKES A MISTAKE AND MISPRONOUNS

SOMEONE ELSE? (/MISTAKES)

HOW DO I SHARE MY PERSONAL PRONOUNS? (/SHARING)

**HOW DO I ASK SOMEONE THEIR PERSONAL PRONOUNS?
(/ASKING)**

**HOW DO I USE GENDER INCLUSIVE LANGUAGE?
(/INCLUSIVELANGUAGE)**

**WHAT ADDITIONAL RESOURCES AND LINKS CAN HELP ME?
(/RESOURCES)**

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

What and Why



WHAT ARE PERSONAL PRONOUNS AND WHY DO THEY MATTER?

In English, whether we realize it or not, people frequently refer to us using pronouns when speaking about us. Often, when speaking of a singular human in the third person, these pronouns have a gender implied -- such as “he” to refer to a man/boy or “she” to refer to a woman/girl. These associations are not always accurate or helpful.

Often, people make assumptions about the gender of another person based on the person’s

appearance or name. These assumptions aren’t always correct, and **the act of making an assumption (even if correct) sends a potentially harmful message** -- that people have to look a certain way to demonstrate the gender that they are or are not.

Using someone’s correct personal pronouns is a way to respect them and create an inclusive environment, just as using a person’s name can be a way to respect them. Just as it can be offensive or even harassing to make up a nickname for someone and call them that nickname against their will, **it can be offensive or harassing to guess at someone’s pronouns and refer to them using those**

pronouns if that is not how that person wants to be known. Or, worse, actively choosing to ignore the pronouns someone has stated that they go by could imply the oppressive notion that intersex, transgender, nonbinary, and gender nonconforming people do not or should not exist.

When we refer to "personal" pronouns, we don't mean that these pronouns are necessarily private information (generally they are not), we mean that they are pronouns referring to a unique and individual person.

Hopefully, you now have a fundamental understanding about why pronouns matter. If you'd like to know more and to hear stories from trans and gender nonconforming people about their lived experiences with pronouns, please check out some of the videos and links in the resources section of this website (/resources). Once you understand what we're talking about and why, let's learn about how to use personal pronouns (/how).



CONTINUE TO THE NEXT SECTION - HOW (/HOW)

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

How

HOW DO I USE PERSONAL PRONOUNS?

When a person shares their pronouns (/sharing), they are naming the pronouns that they want to be referred to by in the singular third person (when referring to that person while talking to someone else). Singular pronouns in the first person (when referring to yourself) or second person (when referring to a person when talking to that same person) do not vary. For reference, however, we have included examples of singular first person and second person pronouns, as well third person pronouns.

Singular first person pronouns (that you should continue to use, as is):

“I am a writer and wrote that book **myself**. Those ideas are **mine**. Do you like both **me** and **my** ideas?”

Singular second person pronouns (that you should continue to use, as is):

“**You** are a writer and wrote that book **yourself**. Those ideas are **yours**. I like both **you** and **your** ideas.”

Singular third person pronouns (that you should use as appropriate based on the pronouns the person being referred to goes by):

Each of the following sets of pronouns may be the sets that certain people indicate should be used to refer to them. Below, they are presented in the forms of most common usage.



Usually, the “they/them” pronouns set is acceptable to use when you don’t yet know if a person goes by another set or sets of pronouns. You can learn more about the centuries of history behind the singular “they” pronoun to refer to an individual in the resources section (/resources). It is also possible to avoid pronouns, as demonstrated below under “no pronouns.”

Just because a person goes by a certain set or sets of pronouns is not indicative of that person’s gender. A person could be transgender or not transgender (also called “cisgender” - the vast majority of the population is cisgender) and might share the pronouns they go by. A person could be a man or a woman or both or neither and share any number of these sets of pronouns as the correct ones to use for them, but which set they go by is not necessarily indicative of their gender, even though for most people there is an association between the pronouns they go by and the gender they are.

She/Her: “**She** is a writer and wrote that book **herself**. Those ideas are **hers**. I like both **her** and **her** ideas.”

He/Him: “**He** is a writer and wrote that book **himself**. Those ideas are **his**. I like both **him** and **his** ideas.”

They/Them: “**They** are a writer and wrote that book **themselves**. Those ideas are **theirs**. I like both **them** and **their** ideas.” Please note that although “they” pronouns here are singular and refer to an individual, the verbs are conjugated the same as with the plural “they” (e.g. “they are”). Also note that in this singular pronoun set many use “themselves” rather than “themselves,” although both are typically acceptable.

Ze/Hir: “**Ze** is a writer and wrote that book **hirselves**. Those ideas are **hirs**. I like both **hir** and **hir** ideas.” Please note that “ze” is usually pronounced with a long “e” and that “hir” and its forms are usually pronounced like the English word “here.” Some people instead go by “ze/zir” pronouns because of the more consistent pronunciation and spelling - see the resources section for more pronouns sets (/resources).

No Pronouns - Use My Name (example for someone whose name is “Lan”): “**Lan** is a writer and wrote that book. Those ideas are **Lan’s**. I like both **Lan** and **Lan’s** ideas.” If the reflexive component was important to communicate a message, you could use alternative language such as “**Lan** wrote that book unassisted” or “**Lan** was the sole author of that book.” Some might simply say “**Lan** wrote the book **Lan’s self**.”



There are additional sets of pronouns that some people might use (e.g. *ze/zir*, *per/pers*, *ey/em*, *xe/xem*, etc.). Please check with the person who goes by those pronouns and/or look for online resources ([/resources](#)) to determine the proper ways to utilize them. Some people go by multiple sets of pronouns, and usually that means that it is okay to use any of the sets they go by. Some people ask that others vary the pronouns that are used within certain sets of pronouns. If in doubt about what that means for someone or to request examples of how to do that in practice, let the person know you want to be supportive and ask the person for more information or examples so that you can get it right.

Please note that there are also nonbinary, gender-neutral titles (e.g. "Mx." usually pronounced like "mix" instead of "Mr." or "Ms.") and nonbinary, gender-neutral language that can be used for everyone (e.g. "friends and guests" instead of "ladies and gentlemen"). While this website is focused on pronouns, you can find more information about gender-neutral language through our resources page ([/resources](#)).

You can also find more information about some of the more common pronouns sets through these links, which can also be used as a way to point others towards information about that pronoun set:

- <http://pronouns.org/she> (<http://pronouns.org/she>)
- <http://pronouns.org/he> (<http://pronouns.org/he>)
- <http://pronouns.org/they> (<http://pronouns.org/they>)
- <http://pronouns.org/ze> (<http://pronouns.org/ze>)
- <http://pronouns.org/neopronouns> (<http://pronouns.org/neopronouns>)

Now that you know how to use personal pronouns, what if you make a mistake or you see someone make a mistake by using the incorrect pronoun ([/mistakes](#))?

CONTINUE TO THE NEXT SECTION: MISTAKES (MISTAKES)

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

Mistakes

WHAT IF SOMEONE MAKES A MISTAKE AND MISPRONOUNS SOMEONE ELSE?



Depending on the cultural, organizational, and situational context, and the personalities and positionalities of the people interacting, there are many different ways to act if there has been a mistake in referring to someone with the incorrect pronouns. Below are a few example scenarios of ways that people correct themselves or intervene if someone makes a mistake. Please note that these examples focus on times when mistakes are made because of forgetfulness or

ignorance -- different strategies may be necessary when people get pronouns wrong because they are being intentionally and consciously hateful.

If you just recently made a mistake:

Example 1. You are talking about someone who goes by “he/him” pronouns. “She is a great student. I’m sorry, I meant to say he is a great student. He’s been reading all of the assignments very thoroughly and it’s been a pleasure to work with him.” You don’t have to make a big deal out of your mistake or draw a lot of attention to it. You mostly need to fix it. You might have a follow up conversation with the person you referred to incorrectly to apologize or see if there’s something else you can do to correct

it moving forward besides doing better. Making it a bigger deal in the moment is not necessarily helpful and could be harmful unless that's what the person who was incorrectly referred to wants. Depending on the situation, you might be worried that people think you aren't friendly towards transgender people because you made a mistake, but generally it's good to avoid making the situation about you and your intent. A good way to show you are friendly is to get it right in the future and to act upon some of the other guidances you may find through this website or other resources.

Example 2. You are talking in a meeting about someone who goes by "they/them" pronouns. "His idea for that project is going to work very well. Let's try that." Later, after the meeting, you realize that you used the incorrect pronouns for that person, so you go to them and say: "I'm really sorry I used the wrong pronouns for you in that meeting earlier. I know you go by 'they/them' and I will make sure I get it right next time." You don't have to linger on the topic if the other person doesn't want to talk about it further, you can simply work to do better.

If you realize you've been referring to someone with either an assumed set of pronouns or pronouns that might no longer be correct:

Example 3. You have a friend who you've always called "she" because you always thought the friend is a woman and goes by "she." You never had a reason to think anything else would be appropriate, but because you've recently learned that making assumptions about pronouns could be problematic, you realize you might want to ask people -- even those who you think are cisgender -- what pronouns they go by. "Hi Tennishia, how are you? ... I recently was learning about personal pronouns and so I've started to tell people that I go by 'she' and 'hers' pronouns myself. It helps me to create an environment where other people can feel comfortable to tell me what pronouns they go by, because some people really aren't comfortable with the pronouns everyone around them assumes work for them. I know we've known each other a long time, and I've always used 'she' and 'hers' pronouns to refer to you, but I realized I might be making some assumptions. Is 'she' and 'hers' okay or should I be using another set of pronouns to refer to you?"

Example 4. You are facilitating a meeting with people who are familiar with each other. "Good morning, everyone. I know that in some of our past meetings we have shared both our names and our personal pronouns, and we've discussed a bit about why pronouns matter. Even though we all know each other already, I thought it would be a good opportunity for us to share again what names and pronouns we are currently going by, just to remind ourselves that these things can change over time, and we want to get it right and make this an inclusive space. Feel free to share whatever you are comfortable with. My name is still 'Dana' and I am still going by 'he' and 'him' pronouns."

Example 5. You are talking with an acquaintance about a mutual work friend, Nikhil. Nikhil has told you they only go by “they/them” pronouns. “Oh yeah, Nikhil gave me his book to borrow last weekend.” You might respond in a few possible ways. One might be: “Oh? What book did they give you?” This gentle reinforcement could be better than saying “Oh, Nikhil goes by ‘they/them’ pronouns” for several reasons -- Nikhil might not have discussed that with your acquaintance, and the acquaintance might feel put into a corner or not understand much about pronouns. Depending on the relationships you have, there could be an educational conversation. You might also wonder whether Nikhil is consistently wanting “they/them” pronouns in all contexts or if they are only telling that to certain people. That’s why sometimes simply responding to conversations using what you understand to be the correct pronouns can be more helpful than other approaches. Of course, if Nikhil has told you they want you to actively correct other people, go for the educational approach!

Example 6. You are facilitating a workshop in the community with people who mostly don’t know each other, although they are friendly and care about diversity and inclusion. You’ve had a brief discussion about pronouns and included respecting pronouns in your community agreements, and people shared their names and most shared their pronouns at the beginning of the workshop. Later, one workshop participant says “Oh, I really agree with her comment. I also think...” but the person being referred to as “her” actually had earlier said that they go by “they” pronouns. There are many ways you could respond, but one might be speaking to the room: “Maria earlier mentioned they go by ‘they’ pronouns. I know for a lot of folks in this room these concepts about pronouns may seem new or it’s easy to forget them and revert to the assumptions we’ve been programmed to make, but it’s important that we work on this to get it right for folks, just as we’d want to make sure we call people by the right names. I’m happy to chat with anyone during the break who isn’t sure how to do this or what it means or anyone who simply wants to practice. Thanks for your affirmation of Maria’s comment, Dominique, I agree that they really were on point with that one.”

Now that you have some ideas about how to respond when someone makes a mistake, let's talk about how you can share your own personal pronouns (/sharing).

CONTINUE TO THE NEXT SECTION - SHARING (/SHARING)

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

Sharing Your Pronouns

HOW DO I SHARE MY PERSONAL PRONOUNS?

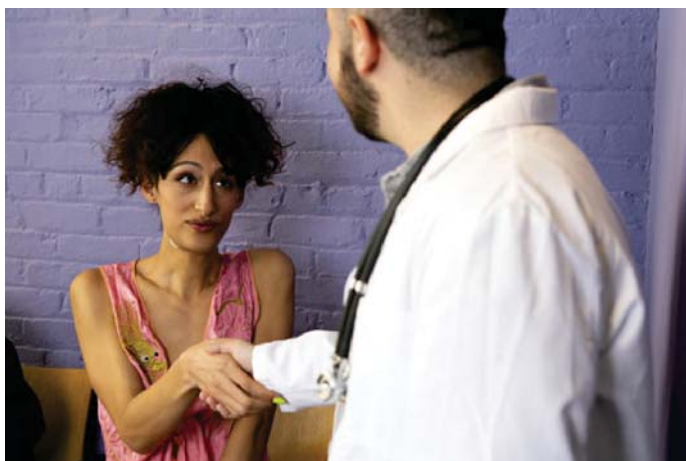
The vast majority of people go by the pronouns sets “he/him” or “she/her.” A small but increasing number of people use “they/them” pronouns or another pronouns set -- sometimes simply because they don’t want to go by pronouns with a gender association (just as some folks go by “Ms.” whether or not they are married, because they don’t think their marital status should be a relevant issue), and sometimes people use pronouns that aren’t associated with one of those two most common (binary) genders because they are nonbinary (i.e. people who are neither exclusively a man nor exclusively a woman -- e.g. genderqueer, agender, bigender, fluid, third/additional gender in a cultural tradition, etc.).



Please note that many nonbinary people identify with the word “trans” (short for “transgender”), but that some do not; and many people who are trans are also men or women (binary). All people, whether they are trans or not trans (cisgender), whether they are men or women or nonbinary -- all people can choose to go by whichever sets of pronouns they are most comfortable with.

So, a great way to create and normalize space for people to share their pronouns is first to share your own. You can do this by saying, for example, “**Hi, my name is Farida and I go by the pronoun ‘she’**” or “**I’m Yoshi and I’m referred to by ‘he/him’ pronouns.**” See also the various pronoun sets (/how) people might use to describe themselves.

Sharing your own pronouns is a great idea, but it isn’t requisite. Keep in mind, however, that there is a privilege of appearing in a way that fits both your gender and the pronouns that many people associate with your gender. In other words, if people’s assumptions are correct, never having to name those assumptions begins to normalize the very process of making assumptions (which for others may be incorrect). Thus, sharing pronouns is a great way to disrupt the normalization and privilege of assumption.



If you are attending an event, you can write on your name tag the pronouns that you go by in the corner, near your name. Sometimes the pronoun alone is sufficient (e.g. “she”), though sometimes it is helpful if there is space to write “pronouns” first before listing which pronouns you go by (e.g. “**Pronouns: he or they**” -- note that some people are open to be referred to by multiple different sets of pronouns, as in this

example).

If you are writing an email, you could include your pronouns in your signature line. You could also include a link to this website or another resource that helps people reading your email to understand why you are listing your pronouns. (e.g. write: “**Pronouns: they/them ~ See www.pronouns.org (/home) to learn more.**”)

You can also share your own pronouns by sharing a link to the pronoun you go by. Here are some of the more common ones:

- <http://pronouns.org/she> (<http://mypronouns.org/she>)
- <http://pronouns.org/he> (<http://mypronouns.org/he>)
- <http://pronouns.org/they> (<http://mypronouns.org/they>)
- <http://pronouns.org/ze> (<http://mypronouns.org/ze>)

If you use business cards, you can also include your pronouns, usually near or below your name, for example:

Jamaal Johnson

Pronouns: he/him

OR

Jamaal Johnson (*pronoun: he*)

There is no singular way to list and share pronouns. Many people say, for example, “she/her/hers” or “she/her” or just “she” and it’s generally understood that this refers to a larger set of pronouns (e.g. that includes “herself”) without having to list every one of those pronouns. You'll also find on our resources page (</resources>) links to additional resources and items that one can get to assist in sharing pronouns.

When you share your pronouns, you may find that you get questions about what that this means or why you are sharing your pronouns. It may be very helpful to review the other sections of this website so that you will feel comfortable explaining the purpose of sharing pronouns.

Now that you understand how to share your own pronouns, let's discuss how to ask other people their personal pronouns (</asking>).

CONTINUE TO THE NEXT SECTION - ASKING (/ASKING)

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

Asking Others Their Pronouns



HOW DO I ASK SOMEONE THEIR PERSONAL PRONOUNS?

First, make sure that you have shared your own pronouns (/sharing) and know how to use others' pronouns correctly (/how). Doing so is the best way to encourage other people to share their pronouns, to help make them more comfortable to share their pronouns with you.

If you are meeting someone new one-to-one, you might say something like: “Hi, I’m Akeem, and I go by ‘they’ pronouns. **How should I refer to you?**” Of course, if you are meeting someone who isn’t familiar with sharing personal pronouns, be prepared to explain that people often make assumptions about whether someone goes by “he” or “she” or another set of pronouns (e.g. “they” or “ze”) based on their appearance, and that the only way to really know how someone will feel respected is to ask what pronouns they go by. Usually offering up that the vast majority of people either go by “he” or by “she” helps indicate to the other person what the typical response is that they might give.

We don’t recommend ever forcing people to share their pronouns. However, people could be invited or encouraged to do so. That is what we mean by “asking” — it’s about invitation. In a group setting where you are a leader, here is one example of how you could conduct a round of introductions:

“Welcome to our meeting. **Before we begin, we’d like to go around and share our names and personal pronouns.** For those who haven’t done this before, this is a way that we can avoid assumptions, particularly about gender. What may seem obvious may actually be incorrect, and please keep in mind that while many people associate “he” or “she” as meaning men or women, respectively, this isn’t always the case.



This is not about sharing your gender or private information, that is not what I’m asking for. I’m only asking for which pronouns you want to be referred to by, because these are a part of the English language in how we typically refer to people. So, for most people, that means they either go by 'she' and 'her' pronouns or they go by 'he' and 'him' pronouns. Some people go by 'they' and 'them' pronouns or another set of pronouns or another way of being referred to. However, for most people in this room you’d simply say something like 'Hi, I’m Lesley and I go by "he" pronouns' or 'Hi, I’m Jamie and I go by "she" pronouns' and then turn to the next person. If you don’t understand what I’m asking, or if you feel that you are uncomfortable sharing or unable to participate in a respectful way, it's okay to just share your name. But if you feel comfortable to share, and you know that typically you go by a certain set of pronouns and are good with that, let us know. Please also keep in mind that what people in this room share today is just what people are sharing today in this space and time, and that people may change their names or pronouns or go by different ones in another space. Does anyone have a question before we begin our introductions?”

Please note that it may be helpful to also have a conversation with the group about how to utilize various pronouns correctly (particularly pronouns sets they may be less familiar with), perhaps also referring them to this website or other resources.

For additional ideas, be sure to check out the additional links and videos on our resources page ([/resources](#)).

CONTINUE TO THE NEXT SECTION - LANGUAGE ([/INCLUSIVELANGUAGE](#))

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

Inclusive Language

HOW DO I USE GENDER INCLUSIVE LANGUAGE?

This reference is meant to provide you with very basic pointers and replacement language to help avoid gender assumptions in your language. Although you might not mean harm, using language that assumes another person's gender or pronouns (if that person has not shared the gender or pronouns to use) can cause harm, as can using language that erases some people's genders by implying there are only two genders (or that only a certain gender is qualified to do a particular job).

Many people have already made the shift in their language to avoid "that's so gay" as a derogatory phrase or to avoid assumptions about sexual orientation (e.g. asking a woman if she has a boyfriend). Many people have stopped using "he" as a universal language to refer to all people, or to exclusive "he" language or "she" language to refer to all fire fighters, all flight attendants, all doctors, all nurses, all administrative assistants, all college students, etc.

Similarly, we need to shift our language to avoid further assumptions that particularly harm transgender and gender nonconforming people. Small changes in language can make a big difference in peoples lives.

Instead of "yes, sir" or "thank you, ma'am" or other language that makes gender-based assumptions, you could simply communicate:

- Good morning!
- Thank you very much.

- It's a pleasure.
- How can I be of assistance today?
- Could I help the next guest?
- Yes, please.
- Yes, absolutely. Coming right up.

Instead of calling upon or remarking about a particular “man” or “woman” (who has not disclosed that identity), you could indicate:

- The person in the red shirt
- The person with their hand raised
- The person who just spoke
- The person over here (gesturing)

Instead of “ladies and gentlemen” or “boys and girls” or other language that assumes only two genders, you could use:

- Friends
- Colleagues
- Friends and colleagues
- Esteemed guests
- Children / Youngsters
- Students

Instead of “he or she” or “s/he” (when speaking of an unknown or universal person) you could communicate:

- They
- That person
- The patron
- The guest

It is fine to use singular pronoun “they” as a way to refer to a specific person who goes by the pronoun “they” or to colloquially refer to a single person of unspecified gender. However, it may not be the best choice of language for a policy or technical writing in which a reference to a single person must be absolutely clear. In this case, instead of writing “he or she” or “s/he” or even “he/she/they” or “they,” it may be best to instead simply repeat the noun: the complainant, the representative, the member, the person, etc. That way, there is total policy clarity. There are also ways to edit sentences to avoid unnecessary repetition.

Instead of “men and women,” you could communicate (depending on what you mean to construe):

- Everyone
- All people
- People of all genders
- Women, men, and nonbinary people

This website also provides much more explanation, examples, and information about pronouns and gender inclusive language. See the appropriate section for more:

WHAT ARE PERSONAL PRONOUNS AND WHY DO THEY MATTER? (/WHAT-AND-WHY)

HOW DO I USE PERSONAL PRONOUNS? (/HOW)

WHAT IF SOMEONE MAKES A MISTAKE AND MISPRONOUNS SOMEONE ELSE? (/MISTAKES)

HOW DO I SHARE MY PERSONAL PRONOUNS? (/SHARING)

HOW DO I ASK SOMEONE THEIR PERSONAL PRONOUNS? (/ASKING)

HOW DO I USE GENDER INCLUSIVE LANGUAGE? (/INCLUSIVELANGUAGE)

WHAT ADDITIONAL RESOURCES AND LINKS CAN HELP ME? (/RESOURCES)

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

ABOUT (/ABOUT)

Additional Resources

WHAT ADDITIONAL RESOURCES AND LINKS CAN HELP ME?

Please note that no resource is perfect or comprehensive, including this website. We encourage you to review many resources, and to really get to know and converse with trans people and gender nonconforming people whose lives are impacted by pronouns more profoundly than for most. Since asking personal questions of acquaintances in order to educate yourself might be a bad idea, and places a burden on already marginalized populations, a good way to learn can be through texts and videos, such as the ones below.

Wikipedia maintains several excellent articles related to personal pronouns:

- Pronoun (<https://en.wikipedia.org/wiki/Pronoun>)
- English Personal Pronouns (https://en.wikipedia.org/wiki/English_personal_pronouns)
- Singular They (https://en.wikipedia.org/wiki/Singular_they)
- Third Person Pronoun (https://en.wikipedia.org/wiki/Third-person_pronoun)

There are many products, such as stickers, buttons, and name tags that can help people share their pronouns.

Once you've learned some things about pronouns and you're ready to educate others, you might want to participate in International Pronouns Day (<https://pronounsday.org/>).

Why Gender Pronouns Matter



Pronouns | Trans | One Word | Cut



Why Pronouns Matter For Trans People



What Are Pronouns?



Additionally, there are many organizations throughout the world supporting transgender, gender non-conforming, and intersex communities and rights. These are just a few of them with websites in English:

- Transgender India (<http://transgenderindia.com/>)
- Transgender Equality Network Ireland (<http://www.teni.ie/>)
- Transgender Europe (<http://tgeu.org/>)
- Transgender and Intersex Africa (<https://www.facebook.com/Transgender-and-intersex-Africa-195694323776480/>)
- The National Center for Transgender Equality (<http://www.transequality.org/>) is a U.S. organization, and includes a web page About Transgender People (<http://www.transequality.org/about-transgender>)
- Intersex Human Rights Australia (<https://ihra.org.au/>)
- International LGBTI Association (<http://ilga.org/>) (ILGA) is a coalition of organizations around the world
- Transgender Resources listing by GLAAD (<http://www.glaad.org/transgender/resources>) - U.S.-focused directory of resources
- GATE - Global Action for Trans* Equality (<https://transactivists.org/>) - international activist organization

PRONOUNS.ORG RESOURCES ON PERSONAL PRONOUNS (/)

HOME (/)

WHAT/WHY (/WHAT-AND-WHY)

HOW (/HOW)

MISTAKES (/MISTAKES)

SHARING (/SHARING)

ASKING (/ASKING)

LANGUAGE (/INCLUSIVELANGUAGE)

RESOURCES (/RESOURCES)

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About

CAN I RE-PUBLISH OR QUOTE THIS WEBSITE?

Pronouns.org was first published on January 22, 2017 and has gone through several updates (including changing its name from MyPronouns.org to Pronouns.org on June 3, 2022). No, you can not re-publish entire pages of this website. But, yes, you can certainly link to the site. You may quote from this site within the principles of fair use.

WHAT IS THIS WEBSITE ABOUT?

Pronouns.org is a practical resource dedicated to the empowering and inclusive use of personal pronouns in the English language. This website will help you understand why and how to use the pronouns someone goes by. In particular, we are focusing on pronouns used to refer to a singular human in the third person.

This website presents one set of perspectives on ways to use personal pronouns in an empowering and inclusive way. You may find that there are many other perspectives, resources, and tools, and we encourage you to seek those out, compare, and decide for yourself the best ways you can be more inclusive and empowering for all, and how that that can match to your own personality, ways of communicating, and cultural or organizational context.

This website refers to “personal pronouns” because “gender pronouns” may not be accurate as some people are agender and their pronouns are not necessarily meant to express any gender. When we refer to "personal" pronouns, we don't mean that these pronouns are necessarily private information (generally they are not), we mean that they are pronouns referring to a unique and individual person.

This website does not use the terms “feminine pronouns” or “masculine pronouns” because pronouns have no universal gendering, although we acknowledge that many people go by certain pronouns in order to express or affirm their gender. Many people may also go by certain pronouns because they are safe or socially accepted, even though those pronouns' typical gender associations may not apply to that person. Some people go by “they” pronouns, which might be thought of as “gender neutral” pronouns, but could be used for a variety of reasons that may have nothing to do with the gender of the person who goes by them.

We do not refer to what pronouns a person “prefers” or “likes” because we believe in most cases people have pronouns that they “go by” and are the correct ones to use to refer to that person. We avoid the language of asking what pronouns someone “uses” because those who are less familiar with personal pronouns can get confused and think that they are being asked which pronouns are a part of their vocabulary and not which pronouns should be used to refer to them as an individual.

EXHIBIT 43





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 *Application forthcoming

Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT
 13 SOUTHERN DISTRICT OF CALIFORNIA

15 ELIZABETH MIRABELLI, an
 16 individual, and LORI ANN WEST, an
 17 individual,

18 Plaintiffs,

19 v.

20 MARK OLSON, in his official capacity as
 21 President of the EUSD Board of
 22 Education, et al.,

23 Defendants.

Case No.: 3:23-cv-0768-BEN-WVG

**Notice of Manual Filing of Flash
 Drive, Tentatively Under Seal, in
 Support of Plaintiffs’ Motion for a
 Preliminary Injunction**

Judge: Hon. Roger T. Benitez
 Courtroom: 5A
 Hearing Date: June 26, 2023
 Hearing Time: 10:30 a.m.

1 **TO: THE COURT, ALL PARTIES, AND THEIR ATTORNEYS**
2 **OF RECORD:**

3 PLEASE TAKE NOTICE that Plaintiffs Elizabeth Mirabelli and Lori Ann
4 West have manually filed a flash drive with the Court, tentatively under seal,
5 containing the following electronic exhibits:


- 6 • **Electronic Exhibit 4:**
 - 7 ○ 19:58 Minute Video of EUSD “Rights of Gender Diverse
 - 8 Students” Presentation
- 9 • **Electronic Exhibit 13:**
 - 10 ○ 1:12:13 Video Presentation of Del Dios Academy February 2, 2023
 - 11 Staff Meeting, specifically Q&A discussion from 0:29:15 to 0:36:10
- 12 • **Electronic Exhibit 37:**
 - 13 ○ 2:31 Minute Video of Rincon Middle School Students Singing:
 - 14 ▪ Part 1 - 20230505_113720 (length 1:20)
 - 15 ▪ Part 2 - 20230505_115433 (length 1:11)

17 Respectfully submitted,

18 LiMANDRI & JONNA LLP

20 Dated: May 15, 2023

By:


 Charles S. LiMandri
 Paul M. Jonna
 Mark D. Myers
 Jeffrey M. Trissell
 Milan L. Brandon II
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*Application forthcoming

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13 SOUTHERN DISTRICT OF CALIFORNIA

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16 individual, and LORI ANN WEST, an
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**Request for Judicial Notice in
Support of Plaintiffs' Motion for a
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Judge: Hon. Roger T. Benitez
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- **Electronic Exhibit 13:** Video of Del Dios Academy Middle School February 2, 2023 Staff Meeting.
- **Exhibit 14:** EUSD Board Policy 4119.21.
- **Exhibit 15:** EUSD Board Policy 0100.
- **Exhibit 16:** EUSD Board Policy 6144 and Administrative Regulation 6144.
- **Exhibit 17:** EUSD Certificated Staff Contract for 2022-2024.
- **Exhibit 19:** EUSD Board Policy 6142.3.
- **Exhibit 20:** EUSD Board Policy 5145.2 and Administrative Regulation 5145.2.
- **Exhibit 21:** Email from Ida Batiste, Rincon Middle School Social Worker, dated April 1, 2022.
- **Exhibit 22:** Email from Gloria Torres Batiste, Rincon Middle School Counselor, dated August 10, 2022.
- **Exhibit 23:** Email Chain from Gloria Torres Batiste, Rincon Middle School Counselor, dated August 12-15, 2022.
- **Exhibit 26:** CDE Frequently Asked Questions page on Assembly Bill 1266, School Success and Opportunity Act.
- **Exhibit 27:** The Interactive Process Meeting (TIPM) Accommodation Assessment Summary for Elizabeth Mirabelli, dated November 15, 2022.
- **Exhibit 28:** The Interactive Process Meeting (TIPM) Accommodation Assessment Summary for Lori Ann West, dated November 15, 2022.
- **Exhibit 30:** EUSD Response to Plaintiffs' First Public Records Request, dated October 19, 2022.
- **Exhibit 32:** EUSD Response to Plaintiffs' Second Public Records Request, dated February 24, 2023.

1 **LEGAL ARGUMENT**

2 Here, Plaintiffs ask that this Court take judicial notice of Defendants’ own
3 generated governmental documents, including (1) EUSD board policies or
4 administrative regulations (Exhibits 1, 2, 3, 14, 15, 16, 19, 20), (2) EUSD documents
5 explaining or implementing its gender identity policies (Exhibits 4, 5, 6, 11, 12, 13, 21,
6 22, 23); (3) the EUSD Certificated Staff Contract (Exhibit 17); (4) documents
7 generated by the parties’ Title VII religious accommodation negotiation (Exhibits 7,
8 9, 27, 28); (5) the CDE Frequently Asked Questions Page regarding Assembly Bill
9 1266, School Success and Opportunity Act (Exhibit 26); and (6) EUSD’s letters
10 responding to Plaintiffs’ public records act requests (Exhibits 30, 32). These are all
11 properly judicially noticeable.

12 For example, “a court may take judicial notice of ‘matters of public record.’ ”
13 *Lee v. City of Los Angeles*, 250 F.3d 668, 689 (9th Cir. 2001) (citing *Mack v. South Bay*
14 *Beer Distrib.*, 798 F.2d 1279, 1282 (9th Cir. 1986)). Government documents that are
15 public records are appropriate subjects for judicial notice. *See, e.g., Cachil Dehe Band*
16 *of Wintun Indians of the Colusa Indian Cmty. v. California*, 547 F.3d 962, 968 n.4 (9th
17 Cir. 2008) (government documents on government website); *Greeson v. Imperial Irr.*
18 *Dist.*, 59 F.2d 529, 531 (9th Cir. 1932) (“[T]he court is bound to take notice of public
19 facts . . . [and] public documents”).

20 Here, the documents at issue are all attached to the Complaint, and
21 authenticated by the Complaint itself, which is verified by both Plaintiffs. (*See*
22 *Compl.*, pp. 65-66.) Twenty-four of the twenty-five exhibits are documents generated
23 by, and originating with, EUSD; the other comes from the website of the California
24 Department of Education. Because there can be no dispute that these documents are
25 authentic government documents, the Court should take judicial notice of them.

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CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that this Court take judicial notice of the above-referenced governmental documents, all of which are attached to the Verified Complaint.

Respectfully submitted,

LiMANDRI & JONNA LLP

Dated: May 15, 2023

By:



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