

November 19, 2024

Honorable Frances Rothschild, Presiding Justice Honorable Gregory J. Weingart, Associate Justice Honorable Helen I. Bendix, Associate Justice California Court of Appeal Second Appellate District, Division One Ronald Reagan State Building 300 S. Spring Street 2nd Floor, North Tower Los Angeles, CA 90013

Re: Nelson v. Bridgers
Court of Appeal Case No. B325454
Superior Court Case No. 21STCV35635
Request for Publication of Decision filed October 30, 2024

To the Honorable Presiding Justice Rothschild, Justice Weingart, and Justice Bendix:

Family Violence Appellate Project (FVAP) respectfully requests publication of the above-captioned case pursuant to California Rules of Court, rule 8.1120(a). We are joined in this request by 28 domestic violence, sexual assault, legal aid, and public interest organizations, and academics: Alliance for HOPE International, Asian Americans for Community Involvement, California Protective Parents Association, California Women's Law Center, Community Legal Aid SoCal, Community Overcoming Relationship Abuse, Domestic Violence Legal Empowerment and Appeals Project, Family Violence Law Center, FreeFrom, Healthy Alternatives to Violent Environments, Human Options, Jenesse Center, Inc., Lassen Family Services, Inc., Law Offices of Seth L. Goldstein, Legal Momentum, The Women's Legal Defense and Education Fund, Maitri, National Association of Women Lawyers, National Network to End Domestic Violence, Professor Jane Stoever, Professor Margaret Drew, Public Counsel, Public Law Center, Queen's Bench Bar Association, Saint Vincent De Paul Society, Sikh Family Center, Stopping

Domestic Violence, Survivor Justice Center, and Walnut Avenue Family & Women's Center. (Statements of interest of each organization are below.*)

Nelson v. Bridgers (Nelson) should be certified for publication because it articulates two novel holdings, not yet addressed in prior California published decisions. First, it clarifies that psychological, economic, and emotional abuse toward women, including grooming, by well-known public figures constitutes a matter of public interest under subdivision (e) of Code of Civil Procedure section 425.16, subdivision (e), California's Anti-SLAPP statute. Second, it clarifies that tagging, corroborating, and commenting on a social media post accusing a public figure of domestic abuse is protected conduct under the anti-SLAPP statute. Given that defamation lawsuits are increasingly being used to silence survivors in the wake of the #MeToo movement, 1 certifying Nelson for publication will also help safeguard survivors' right to publicly speak out, preventing the chilling effect that arises from retaliatory lawsuits, and protect survivors' voices and advocacy from being weaponized against them. Accordingly, this case should be certified for publication as it meets at least (See Cal. Rules of Court, rule five of the standards for certification. 8.1105(c)(2), (c)(3), (c)(4), (c)(6) & (c)(8).

1. Nelson Would Be the First Published Opinion to Explain That Publicly Discussing Psychological, Economic, and Emotional Abuse by Prominent Figures Is a Matter of "Public Interest" Under California's Anti-SLAPP Statute.

In *Nelson*, this Court held that Bridgers' Instagram post that corroborated and boosted the visibility of a social media account accusing a well-known music executive of misconduct, including domestic abuse, qualified as a public interest issue under the anti-SLAPP statute. (Opn. at pp. 3, 14-15.) As this Court explained, Bridgers' post referenced "grooming' by Nelson 'being brought to light," and directed "readers to [another Instagram post]" alleging "[Nelson] 'abuses women." (*Id.* at p. 14.) The other Instagram post made by

¹ Medina, <u>How Defamation Is Used to Silence Survivors</u>, Harv. C.R.-C.L. L.Rev. (March 14, 2024) p. 3-6 (as of Nov. 13, 2024).

² All further rule references are to the California Rules of Court unless specified otherwise.

Emily Bannon—Nelson's former romantic partner—also "referred to [Bannon] being 11 years younger than Nelson when they began their relationship and how [Nelson] took advantage of [Bannon], and further attached a screenshot of a text from another woman saying she later came to recognize Nelson's behavior as grooming." (*Id.* at pp. 14-15.) "Given this context," this Court concluded that Bridgers' post stating that "[she] witnessed and can personally verify much of the abuse (grooming, stealing, violence) perpetuated by Chris Nelson," "implicated the issue of men using psychological, economic, and other means of manipulation to gain control over, and abuse, women," which is "a topic of widespread public interest." (*Id.* at p. 15.)

Nelson therefore contemplates a broad conception of abuse, holding that mental, emotional, and economic forms of abuse could be issues of public interest under Code of Civil Procedure section 425.16, subdivision (e).³ No other published decision clarifies that the type of abuse articulated in *Nelson* is a matter of public interest under this statute.

The few published anti-SLAPP cases that have considered whether domestic abuse may constitute a public interest issue focus very narrowly on physical abuse or the sexual abuse of minors. For instance, two published cases consider whether child molestation is an issue of public concern—a fact not at issue in *Nelson*. (See *Terry v. Davis Community Church* (2005) 131 Cal.App.4th 1534, 1547 [protection of "minors from predators, particularly in places such as church programs that are supposed to be safe," was an issue of public interest under section 425.16(e)]; *M.G. v. Time Warner, Inc.* (2001) 89 Cal.App.4th 623 ["child molestation in youth sports" was an issue of significant public interest].)

One published decision in California has recognized that "[d]omestic violence is an extremely important public issue in our society," but the facts of that case differ significantly from *Nelson*. (See *Sipple v. Foundation for Nat. Progress* (1999) 71 Cal.App.4th 226, 238.) *Sipple*—a case decided more than 15-years ago—concerned a news outlet's publication of allegations that a prominent political consultant physically beat and verbally abused his two ex-wives. (*Ibid.*) There, the court held that because the political consultant had "capitalized on domestic violence issues in order to further his career" by engaging in "gender-based advertising against domestic violence," the

³ All further statutory references are to the Code of Civil Procedure unless specified otherwise.

publication of his ex-wives' domestic violence allegations was an issue of public interest. (*Id.* at pp. 238-240.)

In contrast, *Nelson* addresses "grooming"—a non-physical, psychological and emotional form of abuse in which the abuser employs predatory tactics to gain power and control over the victim." (Opn. at pp. 14-15.) *Nelson* also involves social media posts—not an article published by a magazine—and places no weight on whether Nelson publicly advocated to prevent violence against women in its decision. (Opn. at pp. 14-15.) These differences are significant. When *Sipple* was decided nearly two decades ago, domestic violence was largely understood as physical abuse (i.e., wifebeating) and social media barely existed. Since then, the definition has expanded to include less visible forms like psychological and emotional abuse, and social media has become a primary platform for raising awareness about domestic abuse. *Nelson* is therefore more relevant today as it expands the law to include a broader range of behaviors recognized as domestic abuse and provides a fuller understanding of what qualifies as a matter of public interest under the anti-SLAPP statute.

Coleman v. Grand (E.D.N.Y. 2021) 523 F.Supp.3d 244 is the only other case with similar facts to Nelson. (See opn. at p. 15.) However, as an out-of-state decision, Coleman is not binding in California courts, highlighting the need for a published decision on this issue in this state. As no existing precedent in California holds that a public figure's alleged psychological, economic, and emotional abuse constitutes an issue of public interest under section 425.16(e), Nelson should be certified for publication. (See Rule 8.1105(c)(2) ["[a]pplies an existing rule of law to a set of facts significantly different from those stated in published opinions"]; (c)(3) ["explains . . . an existing rule of law"]; and (c)(4) ("[a]dvances a new . . . clarification . . . of a provision of . . . a statute"].) Furthermore, given that Sipple was published over 15-years ago, Nelson also merits publication under Rule 8.1105(c)(8), as it "reaffirms a principle of law not applied in a recently reported decision."

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⁴ Domestic Violence Services Network, Inc., *The Manipulative "Romance" of Grooming & Love Bombing* (Feb. 2024) at https://www.dvsn.org/february-2024-the-manipulative-romance-of-grooming-love-bombing/ (as of Nov. 15, 2024).

2. Nelson Clarifies That Tagging and Commenting on a Social Media Post Accusing a Public Figure of Domestic Abuse Furthers the Public Discourse on an Issue of Public Interest, and Thus Falls Within the Scope of Conduct Protected by the Anti-SLAPP Statute.

As this Court explained, a "writing made in . . . a public forum" that "contribute[s]" to public discussion" about a public interest issue qualifies as protected activity under section 425.16(e)(3). (Opn. at pp. 12-13, 17.) Previously published opinions have held that websites accessible to the public on the internet constitute a public forum for the purposes of the anti-SLAPP statute. (Wong v. Tai Jing (2010) 189 Cal.App.4th 1354, 1366.) However, existing precedent on anti-SLAPP protections for social media posts primarily addresses original, stand-alone posts, such as reviews on a website or publication of an article or other commentary. (See, e.g., Kieu Hoang v. Phong Minh Tran (2021) 60 Cal.App.5th 513, 521 [publishing an article on Facebook alleging Vietnamese billionaire participated in unethical business practices was protected by the anti-SLAPP statute]; Abir Cohen Treyzon Salo, LLP v. Lahiji (2019) 40 Cal.App.5th 882, 888 [critical Yelp reviews alleging improper business practices constitutes protected activity].)

By contrast, *Nelson* would be the first published opinion in California to explain how tagging another individual's social media post containing accusations of abuse by a public figure and corroborating the accusations also "contributes to [the] public discussion" about abusive conduct. As this Court explained, "Bridgers 'participated in' and 'furthered' the public discussion of abuse by commenting on Bannon's post, which itself was made in a public forum and was protected conduct. When public allegations of abuse are corroborated, it serves not only to further the discussion of the specific claims at issue, but also to embolden others who are being victimized to come (Opn. at p. 18.) Indeed, supporting or corroborating another survivor's experiences by tagging or reposting their social media accounts of abuse can create "a chorus bolstering the credibility of victims of sexual assault and harassment." (Ibid., quoting Elliott v. Donegan (E.D.N.Y. 2020) 469 F.Supp.3d 40, 51-52.) As such, *Nelson* uniquely instructs how referencing another social media post can advance the public conversation about a public figure's alleged abuse.

Nelson also offers useful guidance to trial courts, advising them to consider the details and context of the original social media post when determining whether the subsequent, referencing post properly addresses a public issue and contributes to public discourse. (Opn. at p. 20 [rejecting Nelson's argument that it was "improper to consider the claims by Bannon's [original] post," and instead instructing that because "Bridgers's post referenced and corroborated Bannon's post...Bannon's post provides critical context to determine what issues Bridgers's post implicated"].)

Finally, while prior published opinions have established that social media posts can qualify as protected activity under the anti-SLAPP statute, no other California decision has applied this principle to a social media post addressing allegations of non-physical forms of domestic abuse, including grooming, directed at a public figure. Domestic abuse has only been tangentially addressed in other anti-SLAPP cases involving social media posts. (See, e.g., Jackson v. Mayweather (2017) 10 Cal.App.5th 1240, 1252 [although Mayweather's ex-girlfriend accused him of abuse and privacy invasion for disclosing her abortion on social media, his posts did not include any allegations of domestic abuse]; Kieu Hoang, supra, 60 Cal.App.5th at p. 522 [Facebook post made no allegations of domestic abuse but criticized billionaire for using his relationship with a model and actress who was "as young as his grandchild" to sell products].) Given that domestic abuse survivors remain vulnerable to ongoing coercion after the relationship ends, including the threat of meritless litigation, it is essential to have case law that directly resolves this issue.

Accordingly, *Nelson* clarifies for the first time that tagging and commenting on a separate social media post detailing abuse allegations by public figures contributes to the public discourse on abuse, offering important guidance on how to evaluate the reposting of social media posts. Additionally, no published decision directly addresses whether social media posts accusing a public figure of domestic abuse are protected under the anti-SLAPP statute. Because *Nelson* applies established law to a new set of facts, explains an existing rule of law, and provides a significant clarification of the statute, it should be published pursuant to Rule 8.1105(c)(2), (3), & (4).

3. Nelson Addresses a Legal Issue of Continuing Public Interest—Californians' Constitutional Right to Publicly Discuss a Prominent Figure's Alleged Domestic Abuse.

Domestic abuse is a legal issue of continuing public interest, with incidents occurring "more frequently than every three seconds." Each year, an estimated 7 million women in California are physically, sexually, or psychologically abused, or stalked, by an intimate partner. That's more than the combined populations of Los Angeles and Chicago. As such, the California Legislature calls domestic abuse "a pervasive public safety and public health problem," with an estimated cost to Californians of \$73.7 billion.8

Recently, an increasing number of abuse survivors have been targeted by defamation lawsuits as a tool of litigation abuse. U.N. Special Rapporteur for Freedom of Opinion and Expression, Irene Khan, notes: "In a perverse twist in the #MeToo age...women who publicly denounce alleged perpetrators of sexual violence online are increasingly subject to defamation suits or charged with criminal libel or the false reporting of crimes." One advocacy

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⁵ See National Coalition Against Domestic Violence, *Domestic Violence* (2020) p.1 at https://assets.speakcdn.com/assets/2497/domestic_violence-2020080709350855.pdf?1596828650457 (as of Nov. 14, 2024) (hereinafter NCADV).

⁶ See Smith et al., *The National Intimate Partner and Sexual Violence Survey:* 2010-2012 State Report (2017) p. 128, 136 at https://stacks.cdc.gov/view/cdc/46305 (as of Nov. 12, 2024); see also *id.* at p. 118, 120 (annually, over 20 million women in the U.S. report being physically, sexually, or psychologically abused, or stalked).

⁷ See Stats. 2014, ch. 635 (A.B. 2089), § 1, subd. (b).

⁸ Klugman et al., <u>The Costs of Intimate Partner Violence in California</u> (2024) p. 3 (as of November 13, 2024).

⁹ Medina, <u>How Defamation Is Used to Silence Survivors</u>, Harv. C.R.-C.L. L.Rev. (March 14, 2024) pp. 3-6 (as of Nov. 13, 2024) (hereinafter <u>How Defamation Is Used to Silence Survivors</u>); see also Hiatt & Blaize, *The Cultural Gagging of Women Through the Lens of Johnny Depp v. Amber Heard: How Prominent Male Abusers Use Defamation Claims as a Retaliatory Mechanism to Silence Their Victims* (March 11, 2023) pp. 13, 35-39 at https://ssrn.com/abstract=4705065 (as of Nov. 13, 2024).

¹⁰ Harsey & Freyd, <u>Defamation and DARVO</u> (Aug. 18, 2022) vol. 23, No. 5, J. of Dissociation & Trauma 481, 482 (as of Nov. 13, 2024) (hereinafter <u>Defamation and DARVO</u>); see also <u>NCADV</u>, <u>supra</u>, at p. 1 (A substantial percentage—between 40% 449 15th Street, Suite 104, Oakland, CA 94612 | Business Tel: (510) 858-7358 | Helpline: (510) 380-6243

group for student survivors of sexual violence reported that a *quarter* of students who make Title IX complaints are threatened with defamation suits. ¹¹ The Journal of Trauma & Dissociation similarly reports a "worldwide increase in perpetrators filing defamation lawsuits against victims of gender-based abuse." ¹²

These defamation suits offer a new way that abusers can silence their victims and "induce a profound chilling effect." ¹³ They are also often effective because these lawsuits employ the common perpetrator tactic of DARVO (Deny, Attack, Reverse Victim and Offender). ¹⁴ Survivors must then weigh the benefit of speaking out against the threat of a lawsuit to silence, discredit, or financially cripple them.

If published, *Nelson* would help combat this trend, guiding trial courts to reject retaliation against survivors through the court system. The opinion provides essential legal clarity that will help protect survivors who choose to speak out about their abuse, particularly in the context of social media. By affirming that posts discussing domestic abuse, including non-physical forms

like psychological abuse and grooming, are constitutionally protected under the anti-SLAPP statute, this case would create a safer environment for survivors to share their truth without fear of legal retaliation. Harvard's Civil Rights & Civil Liberties Law Review aptly articulates what is at stake when survivors' voices are suppressed:

When survivors speak up either publicly, anonymously, or interpersonally, they create informal information sharing networks where abusers are identified, thereby warning individuals who may interact with them. This also provides the opportunity

and 45%—of women in abusive relationships also report being sexually assaulted by their partner at some point during the relationship).

^{11 &}lt;u>How Defamation Is Used to Silence Survivors</u>, supra, at p. 3.

¹² <u>Defamation and DARVO</u>, supra, at p. 481.

¹³ <u>How Defamation Is Used to Silence Survivors</u>, supra, at p. 4.

¹⁴ <u>Defamation and DARVO</u>, supra, at pp. 482-483.

for other individuals who have been victimized by the same perpetrator to come forward and create a body of accusations that can successfully discredit and deplatform the abuser. Maintaining a survivor's right to speak through these informal, non-legal channels is, therefore, vital to creating accountability outside of a courtroom in addition to maximizing survivor autonomy by providing a viable alternative to pressing charges. ¹⁵

Survivors already face significant barriers to speaking out—fear of lawsuits should not be one of them. Publishing *Nelson* would reassure survivors that their voices are protected, encouraging more individuals to come forward and participate in the public discourse around abuse, knowing that their right to speak freely and advocate for justice is legally safeguarded. This would help shift the power dynamic, empowering survivors and fostering greater accountability for abusers. Accordingly, this opinion should also be published, as it involves a "legal issue of continuing public interest." (Rule 8.1105(c)(6).)

An opinion meeting at least one of the Rule 8.1105(c) standards "should be certified for publication." (Rule 8.1105(c), italics added.) For this, for the reasons aforementioned, and for the countless survivors of abuse grappling with whether to stay silent or speak up, we respectfully request that this Court certify *Nelson* for publication.

Sincerely, FAMILY VIOLENCE APPELLATE PROJECT

Shuray Ghorishi Senior Managing Attorney

^{15 &}lt;u>How Defamation Is Used to Silence Survivors</u>, supra, at p. 4.

*Statements of Interest

Family Violence Appellate Project (FVAP) is a California and Washington state non-profit legal organization whose mission is to ensure the safety and well-being of survivors of gender-based abuse by providing effective appellate legal representation for free. FVAP provides legal assistance to survivors of abuse at the appellate level through direct representation, collaborating with pro bono attorneys, advocating for survivors on important legal issues, and offering training and legal support for legal services providers and domestic violence, sexual assault, and human trafficking counselors. FVAP's work contributes to a growing body of case law that provides the safeguards necessary for survivors of abuse and their children to obtain relief from abuse through the courts.

Alliance for HOPE International (Alliance) is a non-profit organization launched in 2003. The Alliance has five core programs: National Family Justice Center Alliance, Training Institute on Strangulation Prevention, Camp HOPE America, Justice Legal Network and VOICES Survivor Network. The Justice Legal Network is an innovative public interest law firm made up of approximately 15 solo attorneys who have pledged to work with the Alliance in providing civil legal services to domestic violence/sexual assault victims and their children, including protection orders, family law, immigration, personal injury, landlord issues, criminal law and victim rights.

Asian Americans for Community Involvement (AACI) is a nonprofit, community-based organization that provides health, behavioral health, and wellness services to the community regardless of immigration status and/or ability to pay. AACI's Asian Women's Home (AWH) serves survivors of domestic violence and human trafficking and provides a range of services such as 24-hour emergency shelter, peer counseling, individual and group therapy, and client advocacy. As is the case with all of AACI's services, AWH believes in putting the client at the center of our work, ensuring that they have access to treatment, resources, and support services that meet their individual needs.

California Protective Parents Association (CPPA) strives to protect children from incest and family violence through research, education

and advocacy. CPPA seeks to improve and reform family court to ensure that children are not placed at risk because of unsafe custody and visitation decisions.

The **California Women's Law Center** (CWLC) is a statewide, nonprofit law and policy center dedicated to advancing the civil rights of women and girls. Since its inception in 1989, CWLC has placed a particular emphasis on eradicating all forms of discrimination and violence against women.

The mission of **Community Legal Aid SoCal** is to provide civil legal services to low-income individuals and to promote equal access to the justice system through advocacy, legal counseling, innovative self-help services, indepth legal representation, economic development and community education.

Community Overcoming Relationship Abuse (CORA) is the only agency in San Mateo County solely dedicated to helping individuals affected by intimate partner violence. (www.corasupport.org). CORA provides free and confidential services to victims and survivors of domestic/dating violence and abuse. Our services include a 24-hour hotline, support groups, legal services, emergency and transitional housing, and more. We believe that abuse is taking power and control over someone else's life. Everyone has the right to make her or his own choices and decisions. We may not always agree with or understand these decisions, but we must respect them. Our support of survivors of domestic violence is unconditional and non-judgmental. In this light, CORA is dedicated to helping survivors help themselves. Consistent with these beliefs, we work toward social change through community education and support.

The **Domestic Violence Legal Empowerment and Appeals Project** (DV LEAP) is a project of Network for Victim Recovery of DC, a unique nonprofit organization whose local and national advocacy on behalf of crime victims spans acute response through litigation. Adding to this broad spectrum of critical services, DV LEAP makes the law work for domestic violence survivors through appellate advocacy, technical training, and policy initiatives. DV LEAP is the sole national appellate program in the United States providing survivors pro bono representation and advocacy to fight unjust trial outcomes and protect their rights. DV LEAP's amicus briefs in

state and federal courts, as well as in the United States Supreme Court, advance judicial understanding of the law's critical role in protecting domestic violence survivors.

Family Violence Law Center is a 501(c)(3) nonprofit organization and works to end family violence in Alameda County through violence prevention education as well as providing support and legal and counseling services for survivors of domestic violence.

FreeFrom is a national non-profit based in Los Angeles, California, creating pathways to financial security and long-term safety for survivors of intimate partner violence. We envision a world where survivors have sustaining income, savings and credit with which to build wealth and the resources to support individual, intergenerational and community healing—enabling them to thrive. We're building an ecosystem in which survivors can thrive through the use of data, technology, peer-to-peer networks, training programs for shelters, policy advocacy, social enterprise models and cross-sector solutions.

Healthy Alternatives to Violent Environments (Haven) provides intervention, prevention, and supportive services to over 2,000 survivors of domestic and sexual abuse each year. Originally founded as the Stanislaus Women's Refuge Center, Haven has been providing safe shelter and crisis intervention for domestic abuse victims in Stanislaus County since 1977.

Human Options has offered comprehensive services to victims of domestic violence (DV) for over 39 years. Its mission is to ignite social change by educating Orange County to recognize relationship violence as an issue that threatens everyone, advocating for those affected by abuse, extending a safe place for victims and empowering survivors on their journey of healing. Human Options is a multi-service DV organization with a full array of programs that address the specific needs of abused adults and children, including a 24-hour crisis hotline, shelter, transitional housing, counseling, legal advocacy, community outreach, and prevention education.

Jenesse Center is the oldest domestic violence intervention program in South Los Angeles. Through our emergency shelter, transitional residence program, and drop-in center, we provide culturally sensitive services to

transition families from crisis to self-sufficiency through a range of programming including education, counseling, housing assistance, and advocacy through a courthouse-based clinic, LAPD DART partnership, and in-house legal team.

Lassen Family Services, Inc. is a domestic violence/sexual assault crisis agency committed to ending abuse in our community through prevention, healing, advocacy, safety, education, compassionate intervention, and effective partnerships with local community and social service agencies that will support and empower the participant's journey to success.

The **Law Offices of Seth L. Goldstein** is dedicated to the protection of women and children in cases of domestic violence and child abuse.

Legal Momentum, The Women's Legal Defense and Education Fund is the nation's oldest legal advocacy organization for women and girls. Legal Momentum advances the rights of women and girls by using the power of the law and creating innovative public policy. Legal Momentum was a leading advocate for the landmark Violence Against Women Act and its subsequent reauthorizations, which seek to redress the historical inadequacy of the justice system's response to gender violence. Legal Momentum has a particular interest in ensuring that the judicial system adequately protects the rights of victims of sexual and domestic violence and their children.

MAITRI is a free, confidential, nonprofit organization based in the San Francisco Bay Area, that primarily helps families from South Asia (Bangladesh, India, Nepal, Pakistan, Sri Lanka among others) facing domestic violence, emotional abuse, cultural alienation, human trafficking or family conflict.

The mission of the **National Association of Women Lawyers** (NAWL) is to provide leadership, a collective voice, and essential resources to advance women in the legal profession and advocate for the equality of women under the law. Since 1899, NAWL has been empowering women in the legal profession, cultivating a diverse membership dedicated to equality, mutual support, and collective success.

The National Network to End Domestic Violence (NNEDV) represents the 56 U.S. state and territorial coalitions against domestic violence. NNEDV was instrumental in the passage and implementation of the Violence Against Women Act. NNEDV is dedicated to creating a social, political, and economic environment in which domestic violence no longer exists. NNEDV works to make domestic violence a national priority, change the way society responds to domestic violence, and strengthen domestic violence advocacy at every level.

Professor Jane Stoever is a faculty member at the University of California, Irvine School of Law (UCI). She has extensive experience representing abuse survivors, teaching domestic violence law clinics, and engaging in scholarship in the areas of domestic violence law, family law, and feminist legal theory. As the Director of the Domestic Violence Clinic at UCI, Professor Stoever and her students represent abuse survivors in civil, criminal, and immigration cases as they seek to increase their clients' safety and autonomy. Professor Stoever is also the Director of the UCI Initiative to End Family Violence, which unites faculty from 21 departments at UCI and community partners in research and clinical interventions in family violence. She also co-chairs the Orange County Domestic Violence Death Review Team. Professor Stoever previously taught at Georgetown University Law Center, American University Washington College of Law, and Seattle University School of Law.

Professor Margaret Drew is associate professor of law at the University of Massachusetts Law School. Professor Drew has a decades-long history of representing women who have experienced violence. She researches and writes in the field of gender violence, particularly on issues of intimate partner abuse. Professor Drew often represents victims of violence in their appeals of trial court decisions. Professor Drew appreciates the power of a client's ability to appeal and has an extensive history of pro bono appellate work.

Public Counsel is a nonprofit public interest law firm dedicated to advancing civil rights and racial and economic justice, as well as to amplifying the power of our clients through comprehensive legal advocacy. Founded on and strengthened by a pro bono legal service model, our staff and volunteers seek justice through direct legal services, promote healthy and

resilient communities through education and outreach, and support community-led efforts to transform unjust systems through litigation and policy advocacy in and beyond Los Angeles. Public Counsel works closely with survivors of violence and families involved in domestic violence, family, probate, and dependency court proceedings through our Children's Rights Project and the Audrey Irmas Gender Justice Project.

The **Public Law Center** (PLC) is a non-profit legal services organization in Santa Ana, California that provides free civil legal services to low-income residents of Orange County, California. The substantive work performed by PLC staff and volunteers is varied, including family law, immigration, health, housing, veterans, microbusiness, and consumer. PLC's Family Law Unit diligently serves the diverse needs of individuals and families facing domestic violence, sexual assault, and human trafficking, among other legal issues.

Queen's Bench Bar Association, formed in 1921, is a non-profit voluntary membership organization made up of attorneys, judges and law students that seeks to foster professional and social relationships among women lawyers and to promote equality and opportunity for all women through education, programs, and community outreach. Queen's Bench seeks to advance the interests of women in law and society and plays an integral part in furthering the progress of women in the legal profession throughout the Bay Area and beyond.

The mission of **St. Vincent de Paul Society of San Francisco** is to offer hope and service on a direct person-to-person basis, working to break the cycles of homelessness and domestic violence.

Sikh Family Center is the only national gender justice nonprofit for the Sikh community in the U.S., and since 2009 has been working to enhance the health, trauma healing, and well-being of Sikh families across the U.S. In working with victim-survivors of violence since 2009 we know that nonmarital intimate partner violence can be even more difficult to speak about in many cultural and faith communities, and we urge against any case law or policies that are out-of-step with the reality of dating violence in the twenty-first century. Danger and lethality of intimate violence is not determined by a marriage license and/or ceremony.

With the overall goal of promoting non-abusive behavior in today's world, **Stopping Domestic Violence** is a California-based domestic violence victim service organization that provides free, no-cost, wide-ranging services (including shelter, transportation, health care, education, food, clothing, advice, support, guidance, technology, and communication) to all affected by domestic violence.

The mission of **Survivor Justice Center** (formerly known as Los Angeles Center for Law and Justice) is to secure justice for survivors of domestic violence, sexual assault and human trafficking and empower them to create their own future. Located in East Los Angeles, Survivor Justice Center is a 33-person non-profit law firm serving survivors throughout Los Angeles County. Survivor Justice Center's primary practice areas are family law and immigration. However, Survivor Justice Center strives to provide clients with holistic legal services and has both a robust criminal justice advocacy and appellate practice. Through our integrated legal/social worker service model, Survivor Justice Center Community Care Advocates provide supportive services such as education, safety planning, accompaniment, and linkages to other service providers as part of the legal team. Survivor Justice Center is committed to a trauma-informed and culturally-responsive workplace and service provision.

Walnut Avenue Family & Women's Center envisions ending family violence of all kinds. We do this through empowering individuals and families to acquire the skills and resources they need to thrive. Programs provided include services for survivors of domestic violence, housing and employment advocacy, counseling, legal advocacy, crisis intervention and emergency accommodations including food support, early childhood education, mentoring for all ages, parenting classes, clinical counseling, support groups, and community awareness-raising campaigns.