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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN FRANCISCO DIVISION**

18 J.T., et al.,

19 Plaintiffs,

20 v.

21 CITY AND COUNTY OF SAN FRANCISCO, et al.,

22 Defendants.

Case No. 23-cv-06524-LJC

**NOTICE OF MOTION AND MOTION FOR
LEAVE TO FILE BRIEF OF JUVENILE LAW
CENTER ET AL. AS *AMICI CURIAE* IN
OPPOSITION TO DEFENDANTS’ MOTION FOR
SUMMARY JUDGMENT**

Hearing Date: June 4, 2026
Hearing Time: 3:00 PM
Judge: Hon. Lisa J. Cisneros

23 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

24 **PLEASE TAKE NOTICE** that proposed *Amici Curiae* Juvenile Law Center, et al. hereby
25 file the instant motion for leave to file an amicus brief in Opposition to Defendants’ Motion for
26 Summary Judgment in the above captioned case. The proposed brief of *Amici Curiae* and a
27 proposed order are attached.
28

1 *Amici* have sought consent from all parties to this action. Plaintiffs consent to this Motion.
2 *Amici* emailed Defendants on Monday, May 4, 2026 to request consent. On Tuesday, May 5, 2026,
3 Defendants stated their intent to oppose this Motion.

4 This Court may in its “broad discretion” allow the participation of *Amici curiae*,
5 *NetChoice v. Bonta*, 2023 WL 6131619, at *1 (N.D. Cal. Sept. 18, 2023), and does not impose
6 “strict prerequisites that must be established prior to qualifying for *amicus* status.” *In re Dynamic*
7 *Random Access Memory Antitrust Litig.*, No. M-02-1486, 2007 WL 2022026, at *1 (N.D. Cal. July
8 9, 2007). Rather, “an individual or entity seeking to appear as *amicus* must merely make a showing
9 that his/its participation is useful to or otherwise desirable to the court.” *Id.* “The touchstone is
10 whether the *amicus* is ‘helpful,’ and there is no requirement ‘that *amici* must be totally
11 disinterested.’” *California v. Dep’t of Labor*, No. 13-cv-02069, 2014 WL 12691095, at *1 (E.D.
12 Cal. Jan. 14, 2014) (quoting *Hoptowit v. Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982), abrogation on
13 other grounds recognized by *Montijo v. Swaney*, 754 F. App’x 522 (9th Cir. 2018)).

14 *Amici* represent national and local youth justice organizations who are deeply concerned
15 by the mass arrest of children and young people in this case, as well as the alarming police
16 treatment of young Plaintiffs during and in the period immediately following arrest. Drawing on
17 Supreme Court and Ninth Circuit precedent and social science research, *amici* explain why
18 adolescent development, peer socialization, and racialized adultification bias render the doctrine
19 of probable cause inherently flawed when applied to children. In addition, we seek to call the
20 Court’s attention to the specific vulnerability of children to harm and trauma from arrest to
21 contextualize the unreasonableness of the conditions in this case. We respectfully submit that the
22 proposed brief will aid the Court by situating the parties’ briefings within the broader legal and
23 developmental framework uniquely applicable to youth.

1 **STATEMENT OF INTEREST¹**

2 **Juvenile Law Center** fights for rights, dignity, equity, and opportunity for youth. Juvenile
3 Law Center works to reduce the harm of the child welfare and justice systems, limit their reach,
4 and ultimately abolish them so all young people can thrive. Founded in 1975, Juvenile Law Center
5 is the first non-profit public interest law firm for children in the country. Juvenile Law Center’s
6 legal and policy agenda is informed by—and often conducted in collaboration with—youth, family
7 members, and grassroots partners. Since its founding, Juvenile Law Center has filed influential
8 amicus briefs in state and federal courts across the country to ensure that laws, policies, and
9 practices affecting youth advance racial and economic equity and are consistent with children’s
10 unique developmental characteristics and human dignity.

11 **Youth Law Center** is a national organization, founded in 1978, that advocates to transform
12 the foster care and juvenile justice systems so that children and youth can thrive. Through legal,
13 legislative, and policy advocacy, the Youth Law Center works to advance the rights of young
14 people who come into contact with the juvenile justice and child welfare systems and to strengthen
15 the supports available to them so they can transition successfully to adulthood. The Youth Law
16 Center has a particular focus on ensuring that laws and systems account for the unique
17 developmental stages of adolescence, and advocates for reforms that promote healthy development
18 for all young people. Over the course of its history, the Youth Law Center has served as a trusted
19 resource to courts, legislators, and policymakers on the intersection of adolescent development
20 and juvenile justice.

21 **The California Youth Defender Center** (CYDC, formerly known as PJDC), is a state-
22 wide non-profit organization promoting positive outcomes for all young people in California by
23 ensuring excellence in youth defense and advocating for systemic reforms. CYDC provides
24 training and support to youth defenders, works collaboratively on youth justice reform and policy

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26 _____
27 ¹ No counsel for a party authored this brief in whole or in part. No person or entity, other than
28 Amici, their members, or their counsel made a monetary contribution for the preparation or
submission of this brief.

1 advocacy, and authors amicus briefs in significant California appellate and Supreme Court cases.
2 For over 25 years, CYDC has been a recognized source of expertise in youth justice issues both at
3 the state level and nationally. Collectively, CYDC members serve as counsel of record in
4 thousands of juvenile court delinquency cases in California, directly representing youth every day
5 in juvenile court.

6 **Children's Rights** is a national public interest organization based in New York that
7 investigates, exposes, and combats violations of the rights of children. Through strategic advocacy
8 and civil rights impact litigation, Children's Rights holds governments accountable for keeping
9 children and youth safe, healthy, and free from discrimination. Since its founding in 1995,
10 Children's Rights has achieved lasting, systemic change for hundreds of thousands of children
11 throughout the country across over 20 jurisdictions. Children's Rights' litigation has involved
12 multiple child-serving sectors, custodial and non-custodial children, and federal claims of
13 violations of Constitutional rights.

14 **Coleman Advocates** has partnered with San Francisco families and youth through
15 grassroots organizing to improve public schools, strengthen community safety, and shape public
16 policy since 1975. With a dedicated focus on leadership development in communities of color,
17 Coleman believes that preventing adverse outcomes is essential to transforming the future of our
18 communities. By unifying youth, families, and community voices, Coleman Advocates ensures
19 those most impacted have meaningful influence in the decisions shaping our city. Coleman
20 Advocates has helped position San Francisco as a national model through collaborative efforts that
21 advanced such efforts as Ethnic Studies and Wellness Centers in schools. From the Children's
22 Amendment to the Children & Families First Initiative (Prop C), Coleman's member-led
23 campaigns have secured more than \$125 million annually for education, youth, and family
24 programs. Today, Coleman remains dedicated to empowering children, youth, and families to
25 create lasting, positive change in our communities, education systems, and public safety, while
26 fighting injustices and clearing pathways for future generations to succeed.

1 **The Gault Center**, formerly the National Juvenile Defender Center, was created to
2 promote justice for all children by ensuring excellence in youth defense. The Gault Center works
3 to ensure that the constitutional rights of young people in juvenile court are fully protected,
4 recognizing the developmental realities of children and the system’s differential treatment of youth
5 based on race, sexual orientation, gender identity and expression, disability, and poverty. The
6 Gault Center has developed both national standards for the performance of youth defense attorneys
7 and national standards for youth defense and juvenile court systems to ensure that all youth have
8 access to the full range of constitutional protections guaranteed by the U.S. Constitution. The Gault
9 Center also conducts assessments of states’ youth defense delivery systems and works with local
10 leaders to strengthen infrastructures that allow for children to meaningfully access qualified and
11 specialized lawyers. The Gault Center has participated as amicus curiae before the United States
12 Supreme Court and federal and state courts across the country.

13 **Huckleberry Youth Programs (HYP)**, founded in 1967, has been caring for Bay Area
14 youth for over five decades. We seek to empower young people to develop and maintain healthy
15 relationships as well as promote their talents, ideas, leadership and health; to assist youth and their
16 families in overcoming the obstacles they may encounter, which can include family concerns; and
17 to assist young people in navigating complex social welfare, educational and juvenile justice
18 systems. Huckleberry strengthens families and empowers young people with services that promote
19 safety in times of crisis, physical and emotional health and well-being, social justice in
20 communities facing inequity, and educational success. When all youth succeed, the entire
21 community is stronger. More specifically, for 25 years HYP has operated the San Francisco
22 Community Assessment and Referral Center (CARC) a community-based diversion program and
23 assessment center for youth ages 12-18 who are arrested in San Francisco. Our program is a single
24 point of entry for assessment, arrest & crisis intervention, service integration, justice system
25 navigation & individualized referrals to community-based organizations.

26 **Legal Services for Children (LSC)** provides free legal representation to children and
27 youth in the San Francisco Bay area who require advocacy and support to achieve stability, safety,
28

1 and the opportunity to realize their full potential. Through a holistic model that combines legal
2 advocacy with social work services, LSC’s goal is to empower young people to actively participate
3 in the critical decisions that impact their lives. This approach helps clients secure safe and stable
4 homes, pursue educational success, and avoid detention and deportation—systems that have
5 historically and disproportionately harmed Black, Brown, immigrant, and other marginalized
6 communities. Since its founding in 1975, LSC has remained deeply committed to confronting the
7 racial inequities embedded within the juvenile legal system and to advancing policies that
8 challenge systemic injustice and promote equity for vulnerable youth.

9 **National Center for Youth Law** (NCYL) is a non-profit organization that works to build
10 a future in which every child thrives and has a full and fair opportunity to achieve the future they
11 envision for themselves. Since 1971, NCYL has worked side-by-side with youth and their
12 communities to protect the rights of low-income youth and youth of color and ensure that they
13 have the resources, support, and opportunities they need. NCYL represents youth in cases that
14 have a broad impact; engages in legislative and administrative advocacy to provide youth a voice
15 in policy decisions that affect their lives; and supports the advocacy of youth and communities
16 around the country through trainings and technical assistance. NCYL aims to eliminate the practice
17 of incarcerating youth in the adult system and reduce harmful practices for youth in the juvenile
18 and criminal legal systems. One of the primary goals of NCYL's advocacy at the federal, state, and
19 local levels is to ensure that youth in trouble with the law are treated as youth, and not as adults,
20 and in a manner that is consistent with their developmental stage and capacity to change.

1 **CONCLUSION**

2 For the foregoing reasons, *Amici* respectfully request this Court grant leave and accept as
3 filed the attached proposed *amici curiae* brief in opposition to Defendants’ Motion for Summary
4 Judgment.

5 Respectfully submitted,

6 By: /s/ Jessica R. Feierman
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19 *Counsel for Amici Curiae*
20 *Juvenile Law Center, et al.*

21 Dated: May 12, 2026

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2026, a copy of the foregoing was filed and served pursuant to the Court's electronic filing procedures using CM/ECF.

/s/ Jessica R. Feierman
Jessica R. Feierman

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