

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO
APPELLATE DIVISION**

Jeanine T. Williams,

Petitioner,

vs.

The Superior Court of the City and County
of San Francisco,

Respondent.

People of the State of California,

Real Party in Interest.

App. No. 7794

Court No. 13035712

**APPLICATION AND [PROPOSED] ORDER OF *AMICUS CURIAE*
NORTHERN CALIFORNIA CHAPTER OF SOCIETY OF
PROFESSIONAL JOURNALISTS TO FILE BRIEF IN SUPPORT OF
PETITIONER WILLIAMS' PETITION FOR WRIT OF MANDATE**

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Attorneys for *Amicus Curiae* Northern California
Chapter of Society of Professional Journalists

The Northern California Chapter of Society of Professional Journalists respectfully requests leave to file the accompanying Memorandum of Points and Authorities in support of the Petition for Writ of Mandate filed by Petitioner Jeanine Williams in the above-captioned action.

IDENTITY AND INTEREST OF THE AMICUS CURIAE

The Society of Professional Journalists (“SPJ”) is a not-for-profit, national journalism organization dedicated to encouraging the free practice of journalism and stimulating high standards of ethical behavior. SPJ was founded in 1909 as Sigma Delta Chi, a journalistic fraternity. It is the oldest, largest, and most representative organization serving journalists in the United States.

SPJ works to inspire and educate current and future journalists through professional development; and protects First Amendment guarantees of freedom of speech and press through its advocacy efforts. Among other things, SPJ actively follows administrative, legislative, and judicial developments and makes its voice heard through court filings and petitions on behalf of journalists who have been shut-out of hearings, denied access to information, or compelled to turn over notes and research. SPJ has nearly 9,000 members nation-wide, including broadcast, print, and online journalists, journalism educators and students, and other non-

journalist members who support SPJ's mission. The Northern California Chapter ("Nor. Cal. SPJ") was founded in 1931 and has approximately 200 members. Nor. Cal. SPJ has an active Freedom of Information Committee that has recommended that the Chapter be involved in this matter.

Nor. Cal. SPJ's interest in this case, on behalf of the journalists they represent, is upholding the public's right of access and the free flow of information that is so vital to a well-informed citizenry and a free press. Based on the above, Nor. Cal. SPJ can assist this Court by highlighting and explaining the vital importance of transparency in government, the free flow of information, and the public interest in the conduct of public officers.

CONCLUSION

For the foregoing reasons, the *amicus curiae* respectfully request that the Court accept the accompanying for filing in this case.¹

Dated: August 19, 2014

Respectfully submitted,



By _____

James Wheaton
Cherokee Melton
Attorneys for *Amicus Curiae* Society of
Professional Journalists, Northern California
Chapter

¹No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief.

[PROPOSED] ORDER

Having read and considered the application, the Court grants the application to file the Memorandum of Points and Authorities by *Amicus Curiae* Northern California Chapter of Society of Professional Journalists in Support of Petitioner Williams' Writ of Mandate and this Application.

Dated: _____

Judge of the Appellate Division of
the Superior Court

CERTIFICATE OF SERVICE

I, Nicole Feliciano, hereby declare:

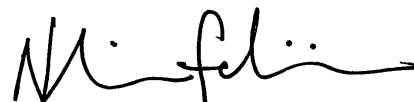
I am over the age of 18 years and am not a party to this action. I am employed in the county of Alameda. My business address is First Amendment Project, 1736 Franklin Street, Ninth Floor, Oakland, CA 94612.

On August 19, 2014, I caused to be served the attached:

APPLICATION AND [PROPOSED] ORDER OF *AMICUS CURIAE* NORTHERN CALIFORNIA CHAPTER OF SOCIETY OF PROFESSIONAL JOURNALISTS TO FILE BRIEF IN SUPPORT OF PETITIONER WILLIAMS' PETITION FOR WRIT OF MANDATE

 X **BY MAIL.** I caused the above identified document(s) addressed to the party(ies) listed below to be deposited for collection at the Public Interest Law Offices or a certified United States Postal Service box following the regular practice for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service on this day.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct, and that this Declaration was executed at Oakland, California on August 19, 2014.



Nicole Feliciano
DECLARANT

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