

1 Charles S. LiMandri, SBN 110841
 2 cslimandri@limandri.com
 3 Paul M. Jonna, SBN 265389
 4 pjonna@limandri.com
 5 Jeffrey M. Trissell, SBN 292480
 6 jtrissell@limandri.com
 7 Joshua A. Youngkin, SBN 332226
 8 jyoungkin@limandri.com
 9 LiMANDRI & JONNA LLP
 10 as Special Counsel to
 11 THOMAS MORE SOCIETY
 12 P.O. Box 9120
 13 Rancho Santa Fe, CA 92067
 14 Telephone: (858) 759-9930
 15 Facsimile: (858) 759-9938

16 *Attorneys for Plaintiff*
 17 *Captain Jeffrey Little*

18 UNITED STATES DISTRICT COURT
 19 CENTRAL DISTRICT OF CALIFORNIA

20 CAPTAIN JEFFREY LITTLE , an
 21 individual,
 22 Plaintiff,
 23 v.
 24 LOS ANGELES COUNTY FIRE
 25 DEPARTMENT, a public entity, et al.
 26 Defendants.

Case No.: 2:24-cv-04353

**Declaration of Paul M. Jonna, Esq.,
 Providing Status Report Regarding
 Plaintiff’s Need for Preliminary
 Injunctive Relief**

Judge: Hon. Josephine L. Staton
 Courtroom: 8A

Action filed: May 24, 2024

1 I, Paul M. Jonna, Esq., declare and state as follows:

2 1. I am an attorney at law duly licensed to practice before all courts in
3 California, both state and federal. I am a partner with the law firm LiMandri & Jonna
4 LLP, counsel of record for Plaintiff Captain Jeffrey Little. As such, I have personal
5 knowledge of the matters set forth below and could and would testify thereto if
6 called upon to do so.

7 2. The purpose of this declaration is to provide a status report to the Court
8 regarding recent developments. As stated below, in light of steps the Los Angeles
9 County Fire Department has taken to accommodate Captain Little in response to this
10 litigation, Captain Little no longer needs emergency injunctive relief. However, as
11 explained below, Captain Little still intends to file a motion for a preliminary
12 injunction in due course.

13 3. On Friday, May 24, 2024, my office initiated this action by filing the
14 Verified Complaint. Doc. 1. As stated therein, Captain Little has been attempting to
15 seek a religious accommodation for a full year—since June 2023. *Id.* at ¶¶ 31-40 &
16 Exs. D-E. The Fire Department abruptly ended that process in August 2023, stating
17 that Captain Little must renew his request shortly in advance of June 2024. *Id.* at ¶ 60
18 & Ex. S. In the meantime, the Fire Department continued investigating Captain Little
19 for his failure to fly the Progress Pride Flag on June 21, 2023. *Id.* at ¶¶ 42-48 &
20 Exs. H, N, O. Beginning in March of this year and continuing through April and
21 May, Captain Little repeatedly attempted to renew his request for a religious
22 accommodation—attempts that included a demand letter from this office—but he
23 received no substantive response from anyone at the County until May 23, when
24 Risk Management Officer Renée Nuanes-Delgadillo sought an “Interactive Process
25 Meeting” with Captain Little on either May 28 or May 29, 2024. *Id.* at ¶¶ 55-62 &
26 Exs. P-S. Captain Little responded via email later on May 23, accepting the May 29
27 meeting date, and notifying Ms. Nuanes-Delgadillo (and numerous other cc’d senior
28 Fire Department personnel) that he would be filing this lawsuit the next day.

1 4. On Tuesday, May 28, 2024, my office filed an ex parte application for a
2 temporary restraining order and OSC re: preliminary injunction on behalf of Plaintiff
3 Captain Jeffrey Little. Doc. 12. On that same day, we communicated with counsel for
4 the County of Los Angeles against whom we had previously litigated a case, to see
5 whether he could accept service on behalf of the Fire Department. The filing was
6 widely reported in local and national media. *See, e.g.,* Rebecca Ellis, *Lifeguard who*
7 *took down Pride flags at beach sues L.A. County over religious discrimination*, L.A.
8 *TIMES* (May 29, 2024),¹ *LA lifeguard alleges religious discrimination in lawsuit over*
9 *pride flags*, L.A. *DAILY NEWS* (May 29, 2024),² Amelia Neath, *Christian lifeguard*
10 *sues Los Angeles over his disagreement with working near a Pride flag*, *THE*
11 *INDEPENDENT* (May 29 2024),³ Andrew Stanton, *Christian Sues in California Over*
12 *Public Pride Flags*, *NEWSWEEK* (May 30, 2024),⁴ Kristine Parks, *Lifeguard sues LA*
13 *County, alleges he was punished for refusing to fly Progress Pride flag*, *FOX NEWS*
14 (May 31, 2024).⁵ However, due to various technical issues, the summons was not
15 issued until late in the afternoon on Thursday, May 30, 2024, and thus the complaint
16 and ex parte application were not formally served on the defendants by that time.
17 Doc. 16, 17, 18, 19.

18 5. Also on Thursday, May 30, 2024, this Court denied Captain Little’s ex
19 parte application, without prejudice, stating that it could be renewed so long as he
20 “(1) includes updated materials apprising the Court of the outcome of the May 29,
21 2024, interactive process meeting, and (2) provides notice to Defendants. If a
22

23 ¹ [https://www.latimes.com/california/story/2024-05-29/christian-lifeguard-sues-la-](https://www.latimes.com/california/story/2024-05-29/christian-lifeguard-sues-la-county-over-pride-flag-on-beach)
24 [county-over-pride-flag-on-beach](https://www.latimes.com/california/story/2024-05-29/christian-lifeguard-sues-la-county-over-pride-flag-on-beach)

25 ² [https://www.dailynews.com/2024/05/29/la-lifeguard-alleges-religious-](https://www.dailynews.com/2024/05/29/la-lifeguard-alleges-religious-discrimination-in-lawsuit-over-pride-flags/)
26 [discrimination-in-lawsuit-over-pride-flags/](https://www.dailynews.com/2024/05/29/la-lifeguard-alleges-religious-discrimination-in-lawsuit-over-pride-flags/)

27 ³ [https://www.independent.co.uk/news/world/americas/christian-lifeguard-la-pride-](https://www.independent.co.uk/news/world/americas/christian-lifeguard-la-pride-flag-b2553213.html)
28 [flag-b2553213.html](https://www.independent.co.uk/news/world/americas/christian-lifeguard-la-pride-flag-b2553213.html)

29 ⁴ <https://www.newsweek.com/christian-sues-california-pride-flags-1906508>

30 ⁵ [https://www.foxnews.com/media/lifeguard-sues-la-county-alleges-punished-](https://www.foxnews.com/media/lifeguard-sues-la-county-alleges-punished-refusing-fly-progress-pride-flag)
31 [refusing-fly-progress-pride-flag](https://www.foxnews.com/media/lifeguard-sues-la-county-alleges-punished-refusing-fly-progress-pride-flag)

1 renewed application is filed and served on Defendants, the Court will afford
2 Defendants 24 hours from the time of service to respond.” Doc. 20.

3 6. On Wednesday, May 29, 2024, I attended the Interactive Process
4 Meeting which the Los Angeles County Fire Department held with Captain Little.
5 That meeting was conducted by Ms. Nuanes-Delgadillo as well as Captain Little’s
6 direct report, Chief Kyle Power, and a union representative, Gregory Crum. The
7 meeting was entirely informational. Captain Little explained the nature of his
8 religious beliefs, his need for a religious accommodation, and proposed practical
9 means of achieving that accommodation. Ms. Nuanes-Delgadillo took this
10 information down to present it to more senior officials with the Fire Department. On
11 the call, I also specifically informed Ms. Nuanes-Delgadillo that the lawsuit had been
12 filed. She indicated that she was aware that the lawsuit had been filed. No decision
13 was made at the meeting, but a follow-up meeting was scheduled for Friday, May 31,
14 2024, at 11:30 a.m.

15 7. On Thursday, May 30, 2024, at approximately 4:45 p.m., we received
16 notice that the Fire Department had issued a new directive relating to Pride Month,
17 titled “EA-232.” The prior directive, issued for Pride Month 2023, was titled “EA-
18 231.” A true and correct copy of EA-232 is attached as **Exhibit 1**. In relevant part,
19 EA-232 states: “Fire Captains/Unit Supervisors shall ... [e]nsure PPFs [Progress
20 Pride Flags] are flown throughout the month of June at Department facilities within
21 their respective jurisdiction per Attachment A.” Ex.1, p.1.

22 8. Also relevant, EA-232 includes a FAQ to explain that not all Fire
23 Department facilities will be flying the Progress Pride Flag, depending on whether it
24 is practical to do so. Ex. 1, attch. B, p.2. This is relevant to Captain Little’s Free
25 Exercise of Religion argument, in that government activity is not neutral and
26 generally applicable when it makes exemptions for the government’s administrative
27 convenience but refuses to extend an exemption to accommodate religious beliefs.

28 ///

1 9. On Friday, May 31, 2024, I attended the second Interactive Process
2 Meeting. At that meeting, Ms. Nuanes-Delgadillo explained that the Fire Department
3 had determined that it would offer Captain Little a partial religious accommodation.
4 Specifically, because of his work shift—which starts after the Progress Pride Flag
5 needs to be raised (at approximately 7:00 a.m.), and ends before it needs to be
6 lowered—Ms. Nuanes-Delgadillo explained that the Fire Department could agree
7 that Captain Little would not be personally responsible for raising or lowering the
8 Progress Pride Flag.

9 10. However, Ms. Nuanes-Delgadillo explained that Captain Little would
10 still be personally responsible for enforcing compliance with EA-232 and ensuring
11 that his subordinates comply. Thus, for example, if Captain Little arrived on site and
12 found that the Progress Pride Flag had not been raised, or had been positioned
13 incorrectly, he would still be responsible for ensuring its correction. This, Ms.
14 Nuanes-Delgadillo explained, was an essential job function that could not be
15 accommodated without the Department experiencing the undue hardship of assigning
16 another supervisor to check in on the adequate flying of the Progress Pride Flag.

17 11. Captain Little responded by explaining that this was not satisfactory as
18 it would still violate his sincere religious beliefs to enforce compliance and ensure
19 his subordinates were properly flying the Progress Pride Flag. Captain Little also
20 indicated that it was foreseeable that the Progress Pride Flag might not be raised
21 because he believes and is informed that other Fire Department personnel have
22 similar religious objections to his. But Ms. Nuanes-Delgadillo simply responded that
23 Captain Little would need to follow regular protocol if an employee is being
24 insubordinate.

25 12. Ms. Nuanes-Delgadillo also explained that the Fire Department would
26 not offer Captain Little a standing religious accommodation. Instead, he would have
27 to renew his request in advance of every June—and go through new rounds of
28 Interactive Process Meetings.

1 13. My office also raised the issue of the Direct Order which mandates
2 Captain Little’s specific, personal compliance with EA-231 under threat of discipline
3 for noncompliance. *See* Doc. 1, Verif. Compl., ¶¶ 39-40 & Ex. E. Ms. Nuanes-
4 Delgadillo denied Captain Little’s request for suspension of that Direct Order and
5 denied Captain Little’s request to remove the Direct Order from his personnel file.
6 This is significant in part because the Department has yet to clarify: (1) whether the
7 Direct Order applies to EA-232 (or only EA-231); and (2) the relationship between
8 EA-231 whether EA-232 (whether the later supersedes or simply amends the prior).

9 14. As a result of these discussions at the Interactive Process Meeting, it
10 seemed that a renewal of Captain Little’s request for a temporary restraining order
11 would be necessary. During the second Interactive Process Meeting, I informed Ms.
12 Nuanes-Delgadillo of this, and reiterated the existence of this pending lawsuit. The
13 need to renew the request for a temporary restraining order was plain because the
14 Fire Department’s assertion of the factual basis of its “undue hardship” defense is
15 inadequate.

16 15. Under the “undue hardship” analysis, “not all impacts on coworkers are
17 relevant, but only coworker impacts that *go on to affect the conduct of the business.*”
18 *Groff v. DeJoy*, 600 U.S. 447, 472-73 (2023) (cleaned up; emphasis added). “The
19 magnitude as well as the fact of hardship must be determined by the examination of
20 the facts of each case,” and must result in an “actual imposition on co-workers or
21 disruption of the work routine.” *Tooley v. Martin-Marietta Corp.*, 648 F.2d 1239,
22 1243 (9th Cir. 1981) (quotation marks omitted).

23 16. As the Ninth Circuit has explained, “[e]ven proof that employees would
24 grumble about a particular accommodation is not enough to establish undue
25 hardship.” *Anderson v. Gen. Dynamics Convair Aerospace Div.*, 589 F.2d 397, 402
26 (9th Cir. 1978). “If relief under Title VII can be denied merely because the majority
27 group of employees, who have not suffered discrimination, will be unhappy about it,
28 there will be little hope of correcting the wrongs to which the Act is directed.” *Id.*

1 (quoting *Franks v. Bowman Transp. Co.*, 424 U.S. 747, 775 (1976)).

2 17. Here, there is no real likelihood that requiring another supervisor to
3 monitor and ensure proper flying of the Progress Pride Flag will be an impact that
4 goes on to affect the conduct of the Fire Department. At most, there might be
5 grumblings that are per se inadequate to establish an undue hardship.

6 18. Nevertheless, over the weekend, Captain Little believes he has now
7 secured an effective accommodation, working with his direct report, Chief Power.
8 For the month of June, Captain Little will be assigned to two locations: three days
9 per week at Area 33 (comprising Nicholas Beach, Point Dume Beach, and Malibu
10 Beach), and one day per week at Zuma Headquarters. After walking the beach with
11 the Chief, they were able to confirm that—under the terms of new EA-232—at least
12 at present, none of the lifeguard stations in Area 33 would be flying the Progress
13 Pride Flag, because at each location, “The flagpole is ... not able to accommodate
14 *three* flags.” Ex. 1, attach. B, p.1 (emphasis added).⁶ And with respect to his one day
15 per week posting at Zuma Headquarters, where the Progress Pride Flag will be
16 flown, Captain Little was able to find another Captain who was willing to trade shifts
17 for a location where the Progress Pride Flag should not be flying during this June—
18 and the Chief confirmed that he would approve the requested shift change.

19 19. However, last year, as stated in the Verified Complaint, various other
20 supervisors attempted to modify flagpoles within Captain Little’s assigned work
21 areas to add additional sets of clasps, so as to fly more Progress Pride Flags. *See*
22 *Verif. Compl.* ¶ 34. Thus, it is conceivable that such a situation could occur again. To
23 that end, the Chief informed Captain Little that he would make sure that other
24 supervisors refrain from doing so in Area 33. The present situation whereby Captain
25

26 ⁶ This new policy, enacted under threat and actual filing of this lawsuit, is a
27 significant change of position by the County from last year’s EA-231, which required
28 that, at locations only able to fly two flags, the Progress Pride Flag must replace the
California State Flag. The May 30, 2024 policy, EA-232, restores the California
State Flag to its place of honor, behind only the Flag of the United States of America.

1 Little is accommodated, at least for June 2024, is recorded in an email which Captain
2 Little sent to the Fire Department and which is attached as **Exhibit 2**.

3 20. The Fire Department’s sudden *volte face*, enacting a new policy and (in
4 fits and starts) accommodating Captain Little occurred only after the filing of this
5 lawsuit. As stated above, Captain Little has been seeking an accommodation and
6 battling investigations into him for nearly a year. The accommodations which he is
7 seeking are truly de minimis in nature, yet the Fire Department ignored his
8 communications for months. Only after the filing of this lawsuit—and the bright
9 spotlight of local and national media reporting the suit focused on the Fire
10 Department’s wrongdoing—did the Fire Department change position.

11 21. In light of the Fire Department’s sudden willingness to meet with
12 Captain Little, and in light of his ability to find a practical accommodation of his
13 religious beliefs, absent changes to the situation, there is no longer a need for
14 immediate relief in the form of a temporary restraining order in June 2024.

15 22. However, because the Fire Department refused to grant Captain Little a
16 workable and complete religious accommodation for both past and future threats,
17 including refusing him a standing accommodation for future Pride Months, Captain
18 Little will need to prosecute this action and seek both a preliminary and permanent
19 injunction. As of the date of this filing, all of the defendants have been served with
20 the Complaint and Summons in this action.

21 23. Further, as stated above, the Fire Department has also not yet disclosed
22 a definitive list of sites where the Progress Pride Flag will not be flown under EA-
23 232. In the absence of such a list, there remains ambiguity around whether Captain
24 Little could be subject to conflicting requirements, especially if he is recalled to a
25 work site at which the Progress Pride Flag is being flown.

26 24. Lastly, my office is informed that the Fire Department has received
27 possibly hundreds of additional religious accommodation requests similar in nature
28 to Captain Little’s, and that a protest might be planned. This may ultimately require

1 that the Fire Department change its approach to Captain Little and/or revoke his
2 religious accommodation. If so, this may require him to renew his request for a
3 temporary restraining order.

4 I declare under penalty of perjury under the laws of the United States and the
5 State of California that the foregoing is true and correct. Executed this 5th day of
6 June 2024, at Rancho Santa Fe, California.

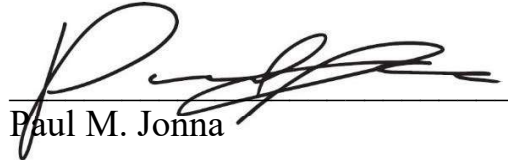
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EXHIBIT 1

May 30, 2024
EA - 232

TO: ALL CHIEF OFFICERS
ALL ADMINISTRATIVE SITES

FROM: FIRE CHIEF ANTHONY C. MARRONE

SUBJECT: **PRIDE MONTH AND PROGRESS PRIDE FLAG**

Throughout the month of June, the Department will celebrate Pride month. Pride serves as a collective reminder of the importance of safety, visibility, and inclusion of the LGBTQ+ community. Together, we reaffirm our commitment and support of our LGBTQ+ community within our ranks, their families, and the diverse communities we serve.

As a team, we foster a diverse and inclusive work environment and deliver life-safety services with the utmost respect, care, and integrity. In solidarity and alignment with our County partners, we will fly the Progress Pride Flag (PPF) at all Department facilities where the U.S. and California Flags are displayed during the month of June. Department members are also encouraged to reflect on and celebrate LGBTQ+ history and community.

Progress Pride Flag (PPF)

From June 1 through 30, 2024, the PPF shall be flown at all Department facilities as detailed in Attachment A. Flying the PPF is both an order from the [Board of Supervisors](#) and an expectation for all County of Los Angeles facilities, including fire and lifeguard stations. Last year we faced challenges with compliance at several Department facilities. I want to be intentional and clear that compliance is not optional.

Fire Captains/Unit Supervisors shall:

- Ensure PPFs are flown throughout the month of June at Department facilities within their respective jurisdiction per Attachment A.
- Ensure clasps are not removed from Department flagpoles. If clasps or PPFs are damaged or removed, immediately notify your respective battalion chief/section manager via email so replacement clasps and flags may be provided.
- At the end of June, fold and store the PPF for future use.

A separate EMM will be distributed to chief officers and division managers outlining their responsibilities.

All Chief Officers
All Administrative Sites
May 30, 2024
Page 2

Pride Patches

In partnership with the Women's Fire League, the specially designed Pride patches and pins below may be worn by personnel throughout the month of June. Pride patches and pins are available for purchase by clicking [here](#).



Townhall Virtual Session

As we strive for excellence and serve with compassion to be the best we can be for one another and our communities, it is important that every voice is heard. A townhall virtual session has been scheduled for Friday, June 7, 2024, from 1:00 p.m. to 2:00 p.m., and may be accessed by clicking [here](#).

Department personnel may share their perspectives or submit questions in advance by clicking [here](#).

There will be no paid overtime to attend. Personnel assigned to 56 and 40-hour positions are allowed to attend on-duty with their supervisor's approval.

Resources

For frequently asked questions, please refer to Attachment B. Additional information and resources are available by scanning the QR code below:



As we continue to move the needle forward in our efforts to remain one of the greatest fire departments in the world, we must all remain dedicated and steadfast in fostering a welcoming and inclusive environment for everyone.

All Chief Officers
All Administrative Sites
May 30, 2024
Page 3

Thank you for your commitment in ensuring everyone is valued and can thrive without fear, regardless of their sexual orientation or gender identity.

If you have any questions, please contact your respective assistant fire chief and/or division manager.

ACM:heo

Attachments

Attachment A

FLYING THE PROGRESS PRIDE FLAG

With the exception of Flag Day, Friday, June 14, 2024, when the Prisoner of War/Missing in Action flag is flown, the Progress Pride Flag (PPF) shall be flown as follows at all Department facilities:

Proper Orientation for the PPF

The proper orientation for the PPF is below:



If flagpoles can support three flags safely, clasps shall be added to fly the U.S. flag at peak, followed by the State of California (State) flag, and the PPF.

Progress Pride Flag Frequently Asked Questions

On May 21, 2024, the Board of Supervisors directed all County of Los Angeles facilities that currently fly the U.S. and California state flags to fly the Progress Pride Flag (PPF) during the month of June, as a way of recognizing the County of Los Angeles' support for LGBTQ+ communities.

The following are some brief responses that you may use if you receive questions from the community about the PPF.

Why are you flying the PPF?

On May 21, 2024, the Board of Supervisors voted unanimously that the PPF would be flown at all County of Los Angeles facilities that display the U.S. and California state flags during the month of June in recognition of LGBTQ+ Pride Month. Flying the PPF demonstrates the County of Los Angeles' support for LGBTQ+ communities.

Can you fly the _____ flag instead? (flag of other nation or group, confederate flag, "thin red line" flag, etc.)

The flags flown at County of Los Angeles facilities are set forth by the County of Los Angeles Board of Supervisors Flag policy. We don't have the authority at this Department facility to fly any flags other than those specified.

I thought the LGBTQ+ Pride Flag usually has a rainbow with 6 stripes... why does this one have so many colors?

The PPF is a recent update of the original flag designed in 1978. This flag combines the iconic rainbow flag of six stripes (red, orange, yellow, green, blue, and violet) with the colors of the Transgender Pride Flag (light blue, pink, and white) to honor the transgender and nonbinary communities, and with black and brown stripes to represent LGBTQ+ communities of color and those living with or lost to HIV/AIDS. The new stripes are added in a chevron shape like an arrow to show the need for forward movement.

I see that [neighboring County Fire Department facility] is flying a PPF... why isn't this Fire Department facility flying the PPF?

Reasons will vary by location, but possible reasons that a Fire Department facility may not be able to participate include:

- The Fire Department facility does not have an exterior flagpole;
- The Fire Department facility is at a leased location where the flagpole is controlled by another entity; or
- The flagpole is too short or not able to accommodate three flags.

Attachment B

**Progress Pride Flag
Frequently Asked Questions**

For very vocal or upset residents who don't want to engage in respectful dialogue...

A small number of residents merely want to register their complaint and will not be convinced otherwise, no matter what you say. Refer residents to submit complaints/concerns through the Fire Department's [Compliment and Complaint webpage](#) or by using the QR code below.



Let them know the Fire Department will respond to them in a timely manner. If the resident won't leave their information and insists on elevating the complaint, you may provide them the business telephone number of the jurisdictional battalion chief/section manager. Please remember to notify your respective chain of command as soon as possible.

Tips for Good Customer Service:

- Listen to and repeat back and acknowledge their concern.
- Stay calm and don't take it personally.
- Know when to refer the concern/question to your manager/supervisor. If you find yourself repeating this script more than twice, it's time to refer the concern to your chain of command.
- Let your supervisor/manger know of the interaction as soon as possible (even if you think the matter is resolved).

EXHIBIT 2

From: [Jeff Little](#)
To: [Renee Nuanes-Delgadillo](#)
Cc: [Greg Crum](#); [Kyle Power](#); [Rachel Lara](#); [Adam Uehara](#); [Gregory Crum](#); [Greg Crum](#); [Joshua Youngkin](#); [Paul Jonna](#); [Jeffrey Trissell](#)
Subject: Re: IPM reply
Date: Monday, June 3, 2024 10:17:41 AM
Attachments: [image001.png](#)

Dear Ms Nuanes-Delgadillo,

I wanted to follow-up on our IPM discussion and provide you an update. It has been confirmed by Chief Power that no flagpoles within Area 33 meet the criteria of EA-232 , so I will not have to supervise and adhere to compliance of EA-232 for my regularly scheduled shifts on Thurs - Sat. This shift includes Nicholas Beach, Point Dume Beach, and Malibu Beach. While the department still refuses to publish the locations where the PPF is expected to fly, Chief Power has stated that he has communicated this to Lifeguard Management and the expectation is that no PPF will be flying on those beaches for the duration of June.

For my Wed shifts at Zuma HQ (Area 30) the department has determined that the PPF will be flying and I will still be expected to supervise/monitor compliance/enforce the flying of the PPF flag despite my objections that this infringes on my sincerely held religious beliefs. In light of this, I took the initiative and have found another Captain to trade shifts with me on those Weds in June so I will not have to supervise the PPF flag compliance. Chief Power has indicated he will approve the trade. I am hopeful that this arrangement will work this June and get around the weak accommodation so I can still work without my religious beliefs being compromised.

This is not a long-term solution and it doesn't address being required to supervise and adhere to the PPF policy while still having an active direct order over my head stating that I can be disciplined/terminated for not ensuring the PPF EA is followed. It also doesn't address recalls if I am forced to work at another location where the PPFs are being flown. Please add this communication to the IPM record.

Regards,

Jeff Little

On Wed, May 29, 2024 at 11:57 AM Renee Nuanes-Delgadillo <Renee.Nuanes-Delgadillo@fire.lacounty.gov> wrote:

Thank you Captain.

Renee Nuanes-Delgadillo

She/Her

Risk Management (RM) and Disability Management and Compliance (DMC)

County of Los Angeles Fire Department

1255 Corporate Center Drive, Suite 407

Monterey Park, CA 91754

(323) 267-7054 Phone

(323) 267-1403 Fax

Renee.Nuanes-Delgadillo@fire.lacounty.gov



NOTICE/CONFIDENTIAL: This e-mail message and the attached document(s), if any, are intended only for the official and confidential use of the individual(s) or entity to which it is addressed. If the reader of this e-mail message is not the intended recipient, or the employee or agent responsible for delivering the message and/or attached document(s) to the intended recipient(s), you are hereby given notice that any unauthorized use, dissemination, forwarding or copying of this communication is strictly prohibited. If you have received this communication in error, please contact the sender by reply e-mail or telephone and delete the original message and any attached document(s) from your system. Thank you.

From: Jeff Little <jeffreyrobertlittle@gmail.com>
Sent: Wednesday, May 29, 2024 11:24 AM
To: Renee Nuanes-Delgadillo <Renee.Nuanes-Delgadillo@fire.lacounty.gov>
Cc: Greg Crum <greg.crum@gmail.com>; Kyle Power <Kyle.Power@fire.lacounty.gov>; Rachel Lara <Rachel.Lara@fire.lacounty.gov>; Adam Uehara <Adam.Uehara@fire.lacounty.gov>; Gregory Crum <Gregory.Crum@fire.lacounty.gov>; Greg Crum <gcrum@lacola.org>; Joshua Youngkin <jyoungkin@limandri.com>; Paul Jonna <pjonna@limandri.com>; Jeffrey Trissell <jtrissell@limandri.com>
Subject: Re: IPM reply

CAUTION: External Email. Proceed Responsibly.

Ms Nuanes - Delgadillo,

See attached Direct Order referenced during IPM discussion.

CERTIFICATE OF SERVICE

Captain Jeffrey Little v. Los Angeles County Fire Department, et al.
U.S. Dist. Ct., C.D. Cal., W. Div. Case No.: 2:24-cv-4353-JLS-PD

I, the undersigned, declare under penalty of perjury that I am over the age of eighteen years and not a party to this action; my business address is P.O. Box 9120, Rancho Santa Fe, California 92067, and that I served the following document(s):

- **Declaration of Paul M. Jonna, Esq., Providing Status Report Regarding Plaintiff's Need for Preliminary Injunctive Relief.**

on the interested parties in this action by placing a true copy in a sealed envelope, addressed as follows:

County of Los Angeles Fire Department 1255 Corporate Center Drive, Suite 206 Monterey Park, CA 91754	Fernando Boiteux 2600 The Strand Manhattan Beach, CA 90266
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Fernando Boiteux, Lifeguard Division Chief 1255 Corporate Center Drive Suite 206 Monterey Park, CA 91754	Adam Uehara 2600 The Strand Manhattan Beach, CA 90266
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Adam Uehara, Assistant Lifeguard Chief 1255 Corporate Center Drive Suite 206 Monterey Park, CA 91754	Arthur Lester 2600 The Strand Manhattan Beach, CA 90266
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Arthur Lester, Section Chief
1255 Corporate Center Drive Suite 206
Monterey Park, CA 91754

 X **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Rancho Santa Fe, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

 (BY ELECTRONIC MAIL) I served a true copy, electronically on designated recipients via electronic transmission of said documents.

 (BY ELECTRONIC FILING/SERVICE) I caused such document(s) to be Electronically Filed and/or Service using the ECF/CM System for filing and transmittal of the above documents to the above-referenced ECF/CM registrants.

I declare under penalty of perjury, under the laws of the United States and the State of California, that the above is true and correct.

Executed on June 5, 2024, at Rancho Santa Fe, California.



Kathy Denworth