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9 JOSEPH HEALTH SYSTEM; AND PROVIDENCE
ST. JOSEPH HEALTH
10

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF HUMBOLDT
13

14 ANNA NUSSLOCK,

15 Plaintiff,

16 v.

17 ST. JOSEPH HEALTH NORTHERN
CALIFORNIA, LLC DBA ST. JOSEPH
18 HOSPITAL—EUREKA; ST. JOSEPH
HEALTH SYSTEM; PROVIDENCE ST.
19 JOSEPH HEALTH; AND DOES 1-10,

20 Defendants.
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Case No. CV2500674

**DEFENDANTS' REPLY BRIEF IN
SUPPORT OF DEMURRERS TO
COMPLAINT**

Hearing Date: June 9, 2025
Time: 10:30 a.m.
Dept.: 4

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1 **I. INTRODUCTION.**

2 Plaintiff Anna Nusslock (“Plaintiff”) effectively concedes that (1) her Complaint fails to
3 allege any facts to support a cause of action against separately incorporated Defendants, St.
4 Joseph Health System (“SJHS”) and Providence St. Joseph Health (“PSJH”); and (2) these two
5 Providence entities that she alone (unlike the California Attorney General and Jane Doe) has
6 named do not own or operate St. Joseph Hospital – Eureka (the “Hospital”) and are not licensed
7 to do so. She ignores the authorities cited in the Demurrer holding that Plaintiff must allege more
8 than conclusory allegations before this Court may disregard the corporate form and potentially
9 hold a parent corporation liable for alleged wrongful conduct by a subsidiary. Instead, she simply
10 re-cites the same insufficient and conclusory allegations in the Complaint. Nor does Plaintiff
11 establish that any of her substantive claims can be alleged against entities which do not own or
12 operate the hospital.

13 Plaintiff’s claims are based on the exact same set of facts and circumstances as alleged in
14 the Attorney General’s (“AG”) pending lawsuit against St. Joseph Health Northern California dba
15 St. Joseph Hospital—Eureka (“SJH”), the entity that does own and operate the Hospital,
16 including the allegations regarding SJH’s policy that was the basis for the denial of Plaintiff’s
17 desired abortion procedure. Yet the AG did not name SJHS or PSJH as defendants in its action,
18 for good reason: SJHS and PSJH are not hospitals and were not involved in Plaintiff’s care
19 and none of the claims can properly be alleged against them. As a matter of law, the ESL claims
20 can only be alleged against a licensed hospital and the Unruh Act claims can only be alleged
21 against the entity that allegedly denied emergency services, which again can only be a licensed
22 hospital.

23 California law mandates that the legal responsibility for the treatment of patients is held
24 solely by the governing body of the hospital. Additionally, only hospitals, and not parent entities,
25 are licensed by the California Department of Public Health (“CDPH”) to treat patients and
26 provide emergency services. SJHS and PSJH are not hospitals, nor are they licensed by CDPH to
27 treat patients. Plaintiff’s case, just like the AG’s case, must be against SJH regarding the
28 treatment she received at SJH. Plaintiff has alleged no proper claims against SJHS and PSJH and

1 they should be dismissed from this action.

2 Plaintiff's fourth cause of action for intentional infliction of emotional distress ("IIED")
3 also fails. Plaintiff's Opposition ("Opp.") ignores her own admissions in the Complaint that SJH
4 provided Plaintiff with multiple forms of emergency treatment. SJH's faith-based determination
5 that it could not permit the abortion treatment that Plaintiff sought due to SJH's faith-based
6 policy, after providing her with multiple other forms of emergency pregnancy treatment, clearly
7 does not constitute outrageous or reckless conduct that is "outside the bounds of decency," or "so
8 extreme as to exceed all bounds of that usually tolerated in a civilized society," as is required to
9 state a claim for IIED. *See Chrisman v. Sisters of St. Joseph of Peace*, 506 F.2d 308, 312 (9th
10 Cir. 1974) ("Congress quite properly sought to protect the freedom of religion of those with
11 religious or moral scruples against . . . abortions"). A Catholic hospital that adheres to binding
12 religious doctrine is not engaging in outrageous conduct that would support such a common law
13 tort. Additionally, any inquiry into whether SJH's application of its faith-based policy in
14 Plaintiff's circumstances constituted IIED would necessarily require an inquiry into the Catholic
15 principles underlying SJH's faith-based policy. Such inquiries are prohibited under the church
16 autonomy doctrine, which prohibits courts from adjudicating religious controversies. *Means v.*
17 *U.S. Conference of Catholic Bishops*, 2015 WL 3970046 (W.D. Mich. June 30, 2015), *aff'd*, 836
18 F.3d 643 (6th Cir. 2016).

19 Plaintiff's fifth cause of action for negligent infliction of emotional distress also fails. As
20 the California Supreme Court held in *Potter v. Firestone Tire & Rubber Co.*, 6 Cal. 4th 965, 984
21 (1993), which Plaintiff herself cites: "There is no independent tort of negligent infliction of
22 emotional distress." Plaintiff's arguments that the Court should read her cause of action as one
23 for negligence are, at best, arguments for leave to amend. However, such an amendment also
24 would fail under the church autonomy doctrine.

25 The Court should sustain SJH's Demurrers as to PSJH and SJHS, without leave to amend.
26 The Court should also sustain SJH's demurrers as to Plaintiff's fourth and fifth causes of action
27 against SJH.

II. PLAINTIFF’S COMPLAINT FAILS AS TO SJHS AND PSJH.

Plaintiff’s Opposition effectively concedes that she has not alleged any specific wrongful conduct by SJHS and PSJH. Instead, she simply re-cites the conclusory and insufficient allegations from the Complaint grouping SJHS and PSJH together with SJH, as though they are all just different names for the Hospital where Plaintiff received treatment and where all of the alleged facts occurred. That is demonstrably false. Moreover, the Supreme Court has rejected allegations against multiple entities grouped as “defendants” and held that the plaintiff must allege sufficient facts to state a claim against *each* specific defendant to survive a demurrer by that defendant; generalized group references to “defendants” do not suffice. *Brown v. USA Taekwondo*, 11 Cal. 5th 204, 211 (2021) (court considers whether complaint “adequately alleged each defendant had a legal duty”); *see also Dutra v. Eagleson*, 146 Cal. App. 4th 216, 227-28 (2006) (boilerplate allegations that “defendants, and each of them” engaged in wrongdoing were contradicted by specific allegations that only *particular* defendants did so). A “plaintiff may not sue multiple defendants on speculation that their conduct caused harm and ‘thereafter try to learn through discovery whether their speculation was well-founded.’” *Hawkins v. TACA Int’l Airlines, S.A.*, 223 Cal. App. 4th 466, 479 (2014) (citation omitted).

Moreover, the allegations in the Complaint that Plaintiff cites in her Opposition (Complaint, ¶¶ 46-49) describe alleged conduct by SJH, the entity that owns the Hospital, and not PSJH or SJHS, neither of which are licensed hospitals and do not and cannot provide patient care.¹ At most, these allegations describe the alleged policy at issue, and that it applies to physicians at SJH. But there is no allegation tying PSJH or SJHS to the policy in question other than the conclusory grouping together of all three defendant entities together and calling it “Defendants’ policy”. Such allegations are not sufficient to disregard the separate corporate form and hold PSJH and SJHS liable for actions that are alleged to have only occurred at SJH. “A complaint must set forth the facts with sufficient precision to put the defendant on notice about what the plaintiff is complaining and what remedies are being sought.” *Leek v. Cooper*, 194 Cal.

¹ See Health & Safety Code § 1251 (defining “license” as “a basic permit to operate a health facility with an authorized number and classification of beds”).

1 App. 4th 399, 415 (2011).

2 As explained in the Demurrer (and ignored in Plaintiff's Opposition), Plaintiff's
3 allegations regarding PSJH's membership in SJHS, and SJHS's membership in SJH (Complaint,
4 ¶¶ 12-13) are also insufficient to impose liability on PSJH and SJHS. "[A] corporation is
5 regarded as a legal entity, separate and distinct from its stockholders, officers and directors, with
6 separate and distinct liabilities and obligations." *Sonora Diamond Corp. v. Superior Court*, 83
7 Cal. App. 4th 523, 538 (2000).² Indeed, 'the corporate form will be disregarded only in narrowly
8 defined circumstances.'" *Toho-Towa Co. v. Morgan Creek Prods., Inc.*, 217 Cal. App. 4th 1096,
9 1107 (2013) (citation omitted). Here, no such circumstances are alleged.

10 Under the Corporations Code, a "'Member' means any person who, pursuant to a specific
11 provision of a corporation's articles or bylaws, has the right to vote for the election of a director
12 or directors or on a disposition of all or substantially all of the assets of a corporation or on a
13 merger or on a dissolution 'Member' also means any person who is designated in the
14 articles or bylaws as a member and, pursuant to a specific provision of a corporation's articles or
15 bylaws, has the right to vote on changes to the articles or bylaws." Corp. Code § 5056(a). If a
16 member of a nonprofit corporation were subject to liability to persons allegedly harmed by the
17 corporation simply because they can vote for board directors or vote on other high-level decisions
18 affecting the corporation, then *every* member would be liable for virtually anything the
19 corporation does. Such broad liability would swallow and conflict with the rules limiting the
20 liability of members: "[a] member of a corporation is not, as such, personally liable for the debts,
21 liabilities, or obligations of the corporation." Corp. Code § 5350(a).³ Plaintiff alleges no facts
22 that make SJHS's membership in the SJH corporation, or PSJH's membership in SJHS, any
23 different from that of any other member of any nonprofit corporation. Her conclusory grouping

24
25 ² Plaintiff's attempt to brush aside *Sonora Diamond* and the other on point cases cited in the Demurrer (for
26 the principle that courts will not pierce the corporate veil and impose liability on a parent entity based
27 solely on conclusory allegations) fails. Like those cases, Plaintiff's Complaint contains only "barebones
28 allegations that [PSJH and SJHS] [are] liable solely based on being a parent company of [SJH]." (Opp. at
4:1, fn. 3.)

³ Even a director or officer of a nonprofit corporation, who is more closely connected to the corporation's
operations than a member, cannot be sued for its own negligent acts in the scope of its duties unless the
plaintiff overcomes significant pleading hurdles and obtains leave of court. Code Civ. Proc. § 425.15.

1 together of all three Defendants in connection with her allegations of conduct and incidents that
2 only occurred at SJH is clearly insufficient to support liability against PSJH and SJHS.⁴

3 With respect to hospitals, the legal responsibility for hospital operations lies with the
4 governing body/board of directors of the hospital—not members or any other person or entity
5 connected to the hospital. “Each corporation shall have a board of directors. Subject to the
6 provisions of this part and any limitations in the articles or bylaws relating to action required to be
7 approved by the members (Section 5034), or by a majority of all members (Section 5033), *the*
8 *activities and affairs of a corporation shall be conducted and all corporate powers shall be*
9 *exercised by or under the direction of the board.* The board may delegate the management of the
10 activities of the corporation to any person or persons, management company, or committee
11 however composed, provided that the activities and affairs of the corporation shall be managed
12 and all corporate powers shall be exercised under the ultimate direction of the board.” Corp.
13 Code § 5610 (emphasis added). Here, there are no allegations that the board of SJH has delegated
14 any corporate responsibilities regarding patient care to PSJH and SJHS.

15 Thus, as a matter of law, SJH’s governing body is responsible for its operations. Cal.
16 Code Regs., tit. 22, § 70701; *see also* 42 C.F.R. § 482.12 (Medicare Conditions of Participation
17 specifying that “[t]here must be an effective governing body that is legally responsible for the
18 conduct of the hospital” and imposing specific standards and requirements with respect to, among
19 other things, medical staff and care of patients); Cal. Code Regs., tit. 22, § 70035 (“Governing
20 body [of a hospital] means the person, persons, board of trustees, directors or other body in whom
21 the final authority and responsibility is vested for conduct of the hospital.”); *Hongsathavij v.*
22 *Queen of Angels/Hollywood Presbyterian Med. Ctr.*, 62 Cal. App. 4th 1123, 1143 (1998)

23
24 ⁴ The sole case Plaintiff cites to support her argument, *Davidson v. Seterus, Inc.*, 21 Cal. App. 5th 283, 307
25 (2018), is inapposite. The court in *Davidson* held that the plaintiff’s allegations were sufficient to state a
26 cause of action against the parent entity because “the complaint asserts that IBM [the parent entity], itself,
27 was actively involved in the alleged illegal conduct.” *Id.*, 21 Cal. App. 5th at 306. The plaintiff had
28 alleged that “each and all of the acts and omissions alleged herein were performed by, or are attributable
to” the parent entity, that each defendant was “acting as the agent for the other, with legal authority to act
on the other’s behalf”. *Id.* No regulated licensed entity was involved in *Davidson*. And Plaintiff does not
allege that SJH was “acting as the agent for” PSJH or SJHS. Plaintiff does nothing more than allege SJHS
and PSJH’s corporate status and that they set policies. She does not allege that they had any direct
involvement in Plaintiff’s care at SJH.

1 (“Ultimate responsibility [for hospital operations] is . . . with the governing body . . .”).

2 In sum, only SJH is the licensed operator of the Hospital and as a matter of law, SJH
3 alone, under the direction of its governing body, conducts the activities and affairs of the
4 Hospital. Neither PSJH nor SJHS have any such involvement or responsibility over SJH’s
5 treatment of patients and Plaintiff has not alleged and cannot allege otherwise.

6 SJHS and PSJH also cannot be liable under the ESL because they are not “health
7 facilities”. Plaintiff cannot plead around the statutory definitions of “health facility” and
8 “hospital” under the ESL statute. The statutory definitions are clear: The emergency care
9 requirements under Section 1317(a) apply specifically to “any *health facility licensed* under
10 [Chapter 2 of the Health and Safety Code] that maintains and operates an emergency
11 department”. Health and Safety Code § 1317(a) (emphasis added). The transfer requirements
12 under Section 1317.2 also apply only to “all hospitals with an emergency department licensed by
13 the State Department.” *Id.*, §§ 1317.2, 1317.1; *see also id.*, § 1250(a) (defining a hospital as a
14 “health facility” that “provides 24-hour inpatient care”). Plaintiff does not and cannot allege that
15 PSJH or SJHS are licensed by the CDPH, that they maintain an emergency department, or that
16 they provide 24-hour inpatient care. PSJH and SJHS are not hospitals and they do not treat
17 patients. As such, they are not subject to the ESL. For the same reasons, Plaintiff fails to state a
18 claim against PSJH and SJHS for violation of the Unruh Act. Plaintiff’s claim of discrimination
19 under the Unruh Act is based upon an alleged denial of emergency services that, as discussed
20 above, only a licensed hospital may provide. PSJH and SJHS do not provide emergency services
21 and therefore could not have discriminated in the provision of those services. Plaintiff’s UCL
22 claim is based on the alleged liability of these entities under the other causes of action. Therefore,
23 the UCL claim also fails as to SJHS and PSJH. As discussed below, for the same reasons,
24 Plaintiff cannot state a claim for IIED or negligent infliction of emotional distress against SJH
25 much less against PSJH and SJHS who were not involved in Plaintiff’s care.

26 Accordingly, Plaintiff’s causes of action all fail as to SJHS and PSJH and they should be
27 dismissed from this action with prejudice.

1 **III. THE FOURTH CAUSE OF ACTION FOR INTENTIONAL INFLICTION OF**
2 **EMOTIONAL DISTRESS FAILS.**

3 The fact that SJH provided Plaintiff with multiple forms of emergency treatment, but
4 allegedly would not permit the additional abortion treatment Plaintiff sought due to its faith-based
5 policy, does not constitute outrageous or reckless conduct that is “outside the bounds of decency,”
6 as is required to state a claim for intentional infliction of emotional distress. *Christensen v.*
7 *Superior Court*, 54 Cal.3d 868, 904 (1991) (plaintiff “must allege facts showing outrageous
8 conduct which is intentional or reckless and is outside the bounds of decency”); *see also Trerice*
9 *v. Blue Cross of California*, 209 Cal. App. 3d 878, 883 (1989) (“Conduct, to be ‘outrageous,’
10 must be so extreme as to exceed all bounds of that usually tolerated in a civilized society.”).

11 Indeed, federal law expressly recognizes the need for deference to the conscience rights
12 of religious hospitals, which further demonstrates that SJH’s refusal based on its faith-based
13 policy was not outrageous or outside the bounds of human decency. *See* 42 U.S.C. §300a-7(b) (a
14 hospital *cannot* be forced to “make its facilities available for the performance of any . . . abortion
15 if the performance of such procedure or abortion in such facilities is prohibited by the entity on
16 the basis of religious or moral convictions”); *Chrisman v. Sisters of St. Joseph of Peace*, 506 F. 2d
17 at 312 (“Congress quite properly sought to protect the freedom of religion of those with religious
18 or moral scruples against . . . abortions”). As a matter of law, the exercise of conscience rights by
19 a Catholic hospital cannot constitute the outrageous conduct required to allege a claim for IIED.

20 Plaintiff’s arguments and allegations characterizing the treatment she received in
21 inflammatory terms do not state a claim for IIED. The Complaint admits elsewhere, as it must,
22 that SJH provided Plaintiff with emergency pregnancy care on multiple occasions. *See*
23 Complaint, ¶¶ 26 (“Over the course of the next week, following medical advice from her doctors,
24 she visited the emergency department at SJ Hospital on multiple occasions.”); 29 (“Upon arrival,
25 Anna was still bleeding and in such severe pain that she felt like she could barely walk. Medical
26 staff at the Hospital immediately brought Anna to the Labor and Delivery ward (‘L&D’), where
27 she received an ultrasound.”); 38 (Plaintiff was offered expectant management).⁵ SJH cited these

28 ⁵ According to the American College of Obstetricians and Gynecologists, “expectant management or
induction of labor” are appropriate treatments for PPROM prior to 23-24 weeks of gestation. *Prelabor*

1 allegations in the Demurrer as well. Plaintiff simply ignored them. Moreover, to the extent
2 Plaintiff is claiming that the application of SJH's faith-based policy in Plaintiff's circumstances
3 constituted IIED, any inquiry into SJH's faith-based policy or its particular application in
4 Plaintiff's circumstances is barred under the church autonomy doctrine, which prohibits courts
5 from "adjudicating religious controversies." *Means*, 2015 WL 3970046, at *13 (discussed
6 below). Nor does Plaintiff allege any specific acts of outrageous conduct that would subject
7 PSJH and SJHS to liability for IIED.

8 Plaintiff's reliance on *Conley v. Roman Cath. Archbishop of San Francisco*, 85 Cal. App.
9 4th 1126 (2000) is misplaced. In *Conley*, the plaintiff sued for IIED after the defendant had
10 placed the plaintiff on administrative leave and made allegedly false public reports about the
11 plaintiff, allegedly in retaliation for plaintiff's statutorily mandated reporting suspected child
12 abuse by a priest to church and law enforcement officials. *Id.* at 1129-1130. The defendant
13 argued that the court was barred under the Establishment and Free Exercises Clauses of the
14 Constitution from reviewing whether the defendant's conduct constituted IIED. *Id.* The court
15 disagreed, holding that the claim was reviewable because the Child Abuse and Neglect Reporting
16 Act (Penal Code § 11164 et seq.) expressly included clergy members in the list of those mandated
17 to report known or suspected instances of child abuse to child protective agencies, and the
18 Legislature had determined that requiring clergy members to report suspected cases of child abuse
19 was necessary to further the statute's purpose of protecting children from abuse. 85 Cal. App. 4th
20 at 1131-1133. The court then held that defendant's conduct in sanctioning plaintiff because he
21 made a legally mandated report of suspected child abuse under the statute constituted outrageous
22 conduct sufficient to support a cause of action for IIED. *Id.* at 1133-1134.

23 The circumstances here are nothing like those in *Conley*. For one, Plaintiff has not
24 brought claims under a statute in which the Legislature has expressly included religious
25 individuals or entities within the scope of the statute. Additionally, SJH's denial of a requested
26 procedure due to its faith-based policy, while still offering and providing Plaintiff multiple other

27 _____
28 *Rupture of Membranes*, ACOG Practice Bulletin, Number 217. Obstet. Gynecol., Vol. 135, No. 3 (March
2020), p. e84 (Box 1).

1 forms of treatment, is nothing like the conduct of the defendant in *Conley*.

2 **IV. THE FIFTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF**
3 **EMOTIONAL DISTRESS FAILS.**

4 Plaintiff's arguments regarding her cause of action for negligent infliction of emotional
5 distress are, at best, arguments for leave to amend her Complaint. The Supreme Court has clearly
6 held "[t]here is no independent tort of negligent infliction of emotional distress." *Potter*, 6
7 Cal.4th at 984; *see also Camenisch v. Superior Court*, 44 Cal.App.4th 1689, 1693 (1996)
8 ("negligently causing emotional distress is not an independent tort"); CACI 1620 ("The doctrine
9 of 'negligent infliction of emotional distress' is not a separate cause of action."). None of the
10 cases Plaintiff cites in her Opposition (Opp. 7:4-10) stand for the proposition that negligent
11 infliction of emotional distress can be plead as an independent cause of action.

12 In addition, Plaintiff ignores *Means*, which is directly on point and demonstrates why an
13 amendment by Plaintiff to bring a negligence cause of action would fail. *Means* involved an
14 action for negligence against the United States Conference of Catholic Bishops ("USCCB"), in
15 which the plaintiff had alleged that the USCCB's policies, which were adopted by the hospital in
16 which plaintiff had visited for emergency pregnancy treatment, caused her to receive "improper
17 treatment and information regarding her miscarriage." *Id.* at *1. Specifically, the plaintiff
18 alleged that she had sought emergency medical care at Mercy Health Partners hospital after
19 experiencing labor contractions, and at the hospital she (like Plaintiff) was diagnosed with
20 preterm premature rupture of membranes. *Id.* The plaintiff alleged that the hospital did not
21 discuss with plaintiff the option of terminating her pregnancy or advise plaintiff that its policy did
22 not permit the hospital to help in terminating the pregnancy. *Id.* The plaintiff returned to the
23 hospital two more times over the next two days in severe pain and with bleeding, until she
24 ultimately delivered the baby breech at the hospital, and the baby died several hours later. *Id.*
25 The plaintiff brought negligence claims against USCCB and three of the individual members of
26 Catholic Health Ministries, the Catholic sponsor of the hospital, based on their promulgation and
27 adoption of the ERDs as policy at the hospital, which the plaintiff alleged constituted breaches of
28 their duty to establish policies that ensure patients receive appropriate medical care. *Id.* at *3.

1 The court dismissed the claims, holding that it could not “determine whether the establishment of
2 the ERDs constituted negligence because it necessarily involves inquiry into the ERDs
3 themselves, and thus into Church doctrine.” *Id.* at 13.⁶

4 Similarly here, although Plaintiff conspicuously tries to avoid mentioning that SJH is a
5 Catholic hospital, the elephant in the room cannot be avoided. An inquiry into whether the
6 application of SJH’s faith-based policy in Plaintiff’s circumstances constituted negligence would
7 necessarily require the Court to engage in an inquiry into SJH’s faith-based policy itself, which
8 would constitute a prohibited inquiry into Catholic doctrine. Such inquiries are plainly prohibited
9 under the church autonomy doctrine, which prohibits courts from “adjudicating religious
10 controversies.” *Means*, 2015 WL 3970046, at *13; *see also Our Lady of Guadalupe Sch. v.*
11 *Morrissey-Berru*, 591 U.S. 732, 746 (2020) (the U.S. Constitution “protect[s] the right of
12 churches and other religious institutions to decide matters of faith and doctrine without
13 government intrusion” and protects religious institutions’ “autonomy with respect to internal
14 management decisions that are essential to the institution’s central mission.”). Finally, Plaintiff
15 fails to allege any specific conduct that would subject PSJH or SJHS to liability for negligent
16 infliction of emotional distress.

17 **V. CONCLUSION**

18 Accordingly, the Court should sustain SJH’s Demurrers as to all claims against PSJH and
19 SJHS and dismiss those defendants with prejudice. The Court should also sustain SJH’s
20 demurrers as to Plaintiff’s fourth and fifth causes of action against SJH.

21 Dated: June 2, 2025

MANATT, PHELPS & PHILLIPS, LLP

22 By: /s/ Harvey L. Rochman

23 Harvey L. Rochman

24 *Attorneys for Defendants*

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25 ⁶ For example, in response to the plaintiff’s argument that the ERDs “clearly prohibit hospitals from
26 providing direct abortion under any circumstance,” the court held “Plaintiff’s complaint about the
27 unavailability of ‘direct abortion’ under the ERDs would require a nuanced discussion about how a ‘direct
28 abortion’ is defined in Catholic doctrine,” and then proceeded to list a number of questions regarding
interpretation of several Directives within the ERDs to which the court would need to answer as part of its
inquiry. *Id.* at *13. The court held that “[t]hese questions demonstrate how the application of the
Directives are inextricably intertwined with the Catholic Church’s religious tenets.” *Id.*

1 **PROOF OF SERVICE**

2 ***Anna Nusslock v. St. Joseph Health of Northern California, LLC, et al.***
3 Humboldt County Superior Court Case No. CV2500674

4 I, Regina Coprich, declared as follows:

5 I am employed in Los Angeles County, Los Angeles, California. I am over the age of
6 eighteen years and not a party to this action. My business address is MANATT, PHELPS &
7 PHILLIPS, LLP, 2049 Century Park East, Suite 1700, Los Angeles, California 90067. On
8 **June 2, 2025**, I served the within:

9 **DEFENDANTS' REPLY BRIEF IN SUPPORT OF DEMURRERS TO
10 COMPLAINT**

11 **THE INTERESTED PARTIES IN THIS ACTION ADDRESSED AS FOLLOWS:**

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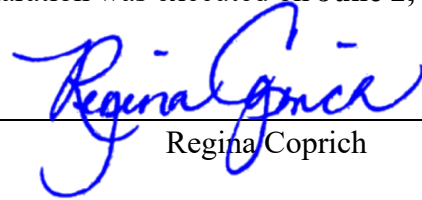
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **June 2, 2025** at Los Angeles, California.


Regina Coprich