No. 20-55267

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

LYDIA OLSON, et al.,

Plaintiffs – Appellants,

v.

STATE OF CALIFORNIA, et al.,

Defendants – Appellees.

On Appeal from the United States District Court
for the Central District of California
Honorable Dolly M. Gee, District Judge

AMICUS BRIEF OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF APPELLANTS AND REVERSAL

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1, nonprofit corporation Pacific Legal Foundation (PLF) states that it has no parent corporation and that no publicly held corporation owns 10% or more of its stock.

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IDENTITY AND INTEREST OF AMICUS CURIAE

Pacific Legal Foundation (PLF) is the nation's oldest public interest legal foundation that seeks to vindicate the principles of limited government, economic liberty, and property rights.[1] [2] Consistent with these goals, PLF attorneys have litigated many cases involving the right to earn a living, *see, e.g.*, *Merrifield v. Lockyer*, 547 F.3d 978 (9th Cir. 2008); *Young v. Ricketts*, 825 F.3d 487 (8th Cir. 2016); *Fontenot v. Hunter*, 378 F. Supp. 3d 1075 (W.D. Okla. 2019); and *Bruner v. Zawacki*, 997 F. Supp. 2d 691 (E.D. Ky. 2014), and have participated in similar cases as amicus curiae. *See, e.g.*, *Niang v. Tomblinson*, 139 S. Ct. 319 (2018); *Sensational Smiles, LLC v. Mullen*, 136 S. Ct. 1160 (2016); *St. Joseph Abbey v. Castille*, 712 F.3d 215 (5th Cir. 2013); and *Powers v. Harris*, 379 F.3d 1208 (10th Cir. 2004). In addition, this case is important to PLF because its attorneys currently represent the plaintiffs in Ninth Circuit

[1] Counsel for the parties in this case did not author this brief in whole or in part. No person or entity, other than Amicus Curiae PLF, its donors, and its counsel made a monetary contribution to the preparation and submission of this brief.

[2] Pursuant to Fed. R. App. P. 29(a) and Circuit Advisory Committee Note to Ninth Circuit Rule 29-3, counsel for PLF obtained consent from the parties to file this brief, thus no motion for leave to file an amicus brief is necessary.

Case No. 20-55408, *American Society of Journalists and Authors v. Becerra*—a case that challenges other provisions of California's AB 5, and includes an equal protection claim similar to that raised by Plaintiffs in this case.

INTRODUCTION AND SUMMARY OF ARGUMENT

California recently enacted AB 5, which codifies and expands the independent contractor test established in *Dynamex Operations West, Inc. v. Superior Court of Los Angeles*, 4 Cal. 5th 903 (2018). *Dynamex* created a strict new three-part test that requires independent contractors to be classified as employees unless the hiring entity satisfies all three prongs of the new "ABC" test. *Id.* at 964. However, *Dynamex* was limited to the "suffer or permit to work" standard in California wage orders and "equivalent or overlapping non-wage order allegations arising under the Labor Code." *Gonzales v. San Gabriel Transit, Inc.*, 40 Cal. App. 5th 1131, 1160 (2019), *review granted*, 456 P.3d 1 (Cal. Jan. 15, 2020) (No. S259027). Wage orders govern issues like minimum wage, overtime pay, meals, and lodging.

In contrast, the new AB 5 legislation applies the strict *Dynamex* ABC test to the entire Labor Code, the Unemployment Insurance Code,

and wage orders. Cal. Labor Code § 2750.3(a)(1). As a result, AB 5's expansion of the ABC test means that drivers like Individual Plaintiffs Olson and Perez must be classified as employees, thus losing the freedom and flexibility prized by independent contractors. AB 5 also grants specific enforcement authority to Defendants "[i]n addition to any other remedies available," to bring an action for injunctive relief.[3] Cal. Labor Code § 2750.3(j). This new enforcement authority means that even contractors like Olson and Perez who wish to work independently can be forced to become employees.

In response to AB 5's enactment, Plaintiffs filed the instant lawsuit alleging that AB 5 infringes on their Fourteenth Amendment rights to equal protection and to earn a living, among other claims. Plaintiffs also sought preliminary injunctive relief, which was denied on the grounds that Plaintiffs were unlikely to prevail in showing that AB 5 is not rationally related to a legitimate government purpose. *See, e.g.*, Order at 13. This appeal followed.

[3] In fact, Defendant Becerra and the City Attorneys of Los Angeles, San Diego, and San Francisco recently took advantage of this new enforcement authority. https://oag.ca.gov/news/press-releases/attorney-general-becerra-and-city-attorneys-los-angeles-san-diego-and-san.

Purportedly applying the rational basis test, the court below held that Plaintiffs' Fourteenth Amendment equal protection and due process right to earn a living claims were unlikely to succeed on the merits. But in setting out the rational basis test, the lower court applied overly deferential language that does not comport with the Supreme Court's actual application of the test. *See, e.g.*, Order at 7-8. In applying the test, courts must consider evidence proffered by plaintiffs that shows justifications for the law are not supported by the facts. *See United States v. Carolene Prods. Co.*, 304 U.S. 144, 152 (1938). The lower court failed to sufficiently consider Plaintiffs' evidence in this case, and as a result, the order denying a preliminary injunction should be reversed.

ARGUMENT

RATIONAL BASIS REVIEW PROVIDES MEANINGFUL REVIEW

Due to some sweeping statements found in a number of Supreme Court decisions, *see, e.g.*, *F.C.C. v. Beach Commc'ns, Inc.*, 508 U.S. 307, 313 (1993) ("equal protection is not a license for courts to judge the wisdom, fairness, or logic of legislative choices"); *United States R.R. Ret. Bd. v. Fritz*, 449 U.S. 166, 179 (1980) (a court's "inquiry is at an end" if there are "plausible reasons" for legislation); *Lehnhausen v. Lake Shore*

Auto Parts Co., 410 U.S. 356, 364 (1973) (plaintiffs must "negative every conceivable basis which might support" the challenged legislation), the rational basis test is often viewed as an insurmountable hurdle for plaintiffs in constitutional cases. But as discussed below, plaintiffs have won many cases under the rational basis test because they were able to show that the government's legislative aims were not legitimate, or the aims were pursued in arbitrary or irrational fashion, or the stated aims were not actually furthered by the legislation. When properly applied then, rational basis review is a meaningful standard of review.

Indeed, rational basis review is not a set of magic words that guarantee the government's success in the face of constitutional challenges to economic regulations. In a challenge to an economic regulation, "the existence of facts supporting the legislative judgment is to be presumed . . . *unless in the light of the facts* made known or generally assumed it is of such a character as to preclude the assumption that it rests upon some rational basis." *Carolene Prods.*, 304 U.S. at 152 (emphasis added). This seminal description of the rational basis test sets out a test that is deferential, but not insurmountable: it establishes, in effect, a rebuttable presumption in favor of legislation that may be

overturned by evidence showing that the purpose of the regulation is illegitimate or the means used to accomplish the ends are irrational. *See, e.g.*, *Borden's Farm Prods. v. Baldwin*, 293 U.S. 194, 209 (1934) (Rational basis is "not a conclusive presumption, or a rule of law which makes legislative action invulnerable to constitutional assault."). Thus, the rational basis test provides a real measure of review, requiring legislation to be sufficiently related to a legitimate government interest to be rational. *See Romer v. Evans*, 517 U.S. 620, 632-33 (1996).

Plaintiffs challenging economic regulations bear the burden of showing the law's irrationality, but rational basis review is not a rubber-stamp of government decision-making. *Mathews v. Lucas*, 427 U.S. 495, 510 (1976) (Rational basis review is not "toothless."). And courts should not apply rational basis review in a manner that is "tantamount to no review at all." *Beach Commc'ns*, 508 U.S. at 323 n.3 (Stevens, J., concurring in result). That many plaintiffs have won cases under rational basis review is evidence of that fact. *See* Timothy Sandefur, *Rational Basis and the 12(b)(6) Motion: An Unnecessary "Perplexity,"* 25 Geo. Mason U. Civ. Rts. L.J. 43, 44 n.8 (2014) (collecting cases); *see also* Robert C. Farrell, *Successful Rational Basis Claims in the Supreme*

Court from the 1971 Term Through Romer v. Evans, 32 Ind. L. Rev. 357 (1999) (surveying rational basis cases in the Supreme Court from 1971 to 1996). When properly applied, rational basis review does not require plaintiffs to disprove every conceivable basis for a challenged law. Sandefur, *supra*, at 48. Instead, courts must consider the propriety of the law in light of facts introduced into evidence, and not imagine hypothetical justifications for considering whether a challenged statute passes muster. *Id.* (citing, e.g., *City of Cleburne v. Cleburne Living Center*, 473 U.S. 432, 447-50 (1985); *Romer*, 517 U.S. at 632-35; *U.S. Dep't of Agric. v. Moreno*, 413 U.S. 528, 533-38 (1973)). Indeed, there are multiple examples where the Supreme Court declared laws unconstitutional under rational basis review because they lacked a sufficient connection to the government's stated legislative goals.

In *Zobel v. Williams*, 457 U.S. 55, 56 (1982), the Court struck down an Alaska statute that established a program sharing oil revenue with state residents, where the payment amounts were determined by length of residence in the state. The Court held that neither of two justifications proffered by the state passed muster under the rational basis test. *Id.* at 61-63.

First, the Court held there was no rational relationship between the state's desire to create financial incentives for people to reside in Alaska and the statute's distinction among beneficiaries based on their length of residency. *Id.* at 61. While the Court acknowledged that payments based on years of residency may incentivize some people to remain in Alaska in the future, that primary function was undermined by the statute's scheme to provide payments for the 21 years of residency prior to the statute's enactment. *Id.* at 62.

Second, the Court rejected as irrational any connection between the government's stated purpose of encouraging prudent management of the oil revenue fund and granting payments for 21 years of residency that predated the statute's enactment. *Id.* at 62-63. Therefore, *Zobel* shows that rational basis review demands a logical connection between legitimate ends and the means chosen to accomplish those ends.

In *Quinn v. Millsap*, 491 U.S. 95, 109 (1989), the Court addressed a provision of the Missouri Constitution granting membership on a local government board only to those who owned real property. The provision failed rational basis review because there was no logical connection between the justifications for the provision advanced by the government

("first-hand knowledge" of civic life and a "tangible interest" in the area) and the land-ownership requirement. *Id.* at 107-09. Indeed, the law was irrational even assuming a logical connection between owning real property and having "first-hand knowledge" or a "tangible interest" in the area because renters—who were prohibited from serving on local government boards—have knowledge and interests similar to property owners. *See id.* at 108.

Likewise, in *Turner v. Fouche*, 396 U.S. 346, 363-64 (1970), the Court held irrational, and therefore unconstitutional, a Georgia municipality's law that made real-property ownership a prerequisite for eligibility to serve on the school board. The Court determined that it could not "be seriously urged" that there was a rational connection between real-property ownership and a school board member's capacity to make wise decisions—the government's proffered justification for the law. *Id.* And a few years later, in a per curiam, one-sentence decision, the Court cited *Turner* to invalidate a similar land-ownership requirement in Louisiana. *See Chappelle v. Greater Baton Rouge Airport Dist.*, 431 U.S. 159 (1977).

Continuing the theme, in *Allegheny Pittsburgh Coal Co. v. Cty. Comm'n of Webster Cty.*, 488 U.S. 336, 344-45 (1989), the Court held that a West Virginia county tax assessor's property assessment practices could not survive rational basis review. Evidence showed that the assessor's practices created disparities between the assessments of similar properties by 8 to 35 times over. The Court therefore deemed those practices—and resulting assessments—not rationally related to the county's objective of assessing all real property at its true value. *Id.* at 343-45.

In *City of Cleburne*, 473 U.S. at 447-50, the Court held that it was irrational for the city to require a special use permit for a group home for the mentally disabled when it did not require the same permit for other group homes. The permit scheme was ruled unconstitutional because the special permit requirement bore no logical connection to the only justifications advanced by the city (concerns that junior high school students across the street may harass the residents; that the home was in a 500-year flood plain; and that the home was large). *Id.* at 449-50.

In *Williams v. Vermont*, 472 U.S. 14, 15 (1985), the Court reviewed a statute that gave favorable tax treatment to Vermont residents who

registered in Vermont vehicles purchased out of state, while denying the same tax benefit to non-residents. The Court held that Vermont's tax scheme was irrational because the purpose of the tax—paying for maintenance and improvement of state roads—was not logically served by arbitrarily granting a credit to one group of road users, and denying the credit to another group. *Id.* at 23-26. Thus, while there was some legitimate governmental purpose that was minimally served by the law, the overall scheme failed rational basis review because it was under-inclusive.

In *Moreno*, 413 U.S. at 529, 532-33, the Court held it was irrational for Congress to exclude households from a federal food stamp program for the sole reason that unrelated people lived together. According to the Court, because the Food Stamp Act was intended to "safeguard the health" of the poor, and the Act included measures to prevent fraud, Congress was "wholly without . . . rational basis" to distinguish between households solely based on whether all members were related. *Id.* at 533-38. Congress was "wholly" irrational because even though the scheme minimally served a legitimate interest in preventing waste of taxpayer

dollars, overall it was irrational to only exclude particular households from the food stamp program in order to pursue that result.

In *Mayer v. City of Chicago*, 404 U.S. 189, 190-91 (1971), a misdemeanor defendant sought a transcript of his trial for an appeal, but an Illinois Supreme Court rule provided transcripts only to felony defendants. The U.S. Supreme Court held that the rule's distinction between felony and non-felony offenses failed rational basis review because the state could provide no logical reason for the distinction. *Id.* at 195-96. In other words, even if the distinction had a minimal rational relationship to the purpose of saving the government money, the rule failed rational basis review due to the arbitrary distinction between felonies and misdemeanors.

And in *Schware v. Bd. of Bar Examiners of State of N.M.*, 353 U.S. 232, 234, 238 (1957), a law school graduate challenged the government's refusal to allow him to sit for the bar exam as a violation of his Fourteenth Amendment substantive due process right to earn a living. The Court held that the denial failed to satisfy rational basis review. *Id.* at 246-47. After reviewing all of the evidence offered by the plaintiff in the case, the Court determined that none of the justifications provided by

the government sufficiently supported the government's conclusion that the plaintiff was morally unfit to be a member of the bar. *Id.* at 240-47.

What the above (and other) Supreme Court cases show is that the Court's application of the rational basis test, while deferential to government action, is a meaningful standard of review under which plaintiffs prevail when they adduce facts to rebut the presumption of constitutionality.[4]

CONCLUSION

In denying Plaintiffs' motion for a preliminary injunction, the lower court failed to sufficiently consider the voluminous evidence introduced by Plaintiffs to show that AB 5 does not survive rational basis review. Under Supreme Court—and this Court's—precedent, the lower court should be reversed.

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[4] Since 1970, plaintiffs have won at least 21 cases at the Supreme Court under the rational basis test. In addition to those already discussed above, other cases include: *United States v. Windsor*, 570 U.S. 744 (2013); *Lawrence v. Texas*, 539 U.S. 558 (2003); *United States v. Morrison*, 529 U.S. 598 (2000); *Vill. of Willowbrook v. Olech*, 528 U.S. 562 (2000); *United States v. Lopez*, 514 U.S. 549 (1995); *Hooper v. Bernalillo Cty. Assessor*, 472 U.S. 612 (1985); *Metro Life Ins. Co. v. Ward*, 470 U.S. 869 (1985); *Plyler v. Doe*, 457 U.S. 202 (1982); *James v. Strange*, 407 U.S. 128 (1972); *Lindsey v. Normet*, 405 U.S. 56 (1972); *Reed v. Reed*, 404 U.S. 71 (1971).

DATE: May 14, 2020.

Respectfully submitted,

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I hereby certify that on May 14, 2020, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system.

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