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18 *Attorneys for Plaintiff*

19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 Thomas Few,

22 Plaintiff.

23 v.

24 United Teachers of Los Angeles, et. al,

25 Defendants.

Case No. 2:18-cv-9531

**PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

Hearing Date: December 6, 2019

Time: 10:30 am

Location: Courtroom 10A

Judge: Hon. Josephine L. Staton

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27 Plaintiff, Thomas Few, respectfully moves for Summary Judgment on Count I of  
28 the First Amended Complaint under Federal Rule of Civil Procedure 56 against

1 Defendants United Teachers of Los Angeles, Austin Beutner, and the Xavier Becerra.

2 Mr. Few respectfully requests that the Court enter a judgment:

3 a. DECLARING that limiting the ability of Few to resign his union membership  
4 to a window of time was unconstitutional because he did not provide affirmative consent;

5 b. DECLARING that Few’s signing of the union card cannot provide a basis for  
6 his affirmative consent to waive his First Amendment rights upheld in Janus because such  
7 authorization was based on the unconstitutional choice between paying the union as a  
8 member or paying the union as a non-member;

9 c. DECLARING that the practice by Austin Beutner of withholding union dues  
10 from Few’s paycheck was unconstitutional because Few did not provide affirmative consent  
11 for her to do so;

12 d. ENJOINING Austin Beutner from collecting union dues from public  
13 employees like Few who request to end their dues deduction prior to an opt-out period  
14 delineated in a collective bargaining agreement;

15 e. ENJOINING the United Teachers of Los Angeles from collecting union dues  
16 from public employees like Few who request to end their dues deduction prior to an opt-  
17 out period delineated in a collective bargaining agreement;

18 f. Awarding DAMAGES against the United Teachers of Los Angeles for all  
19 union dues collected from Few since the commencement of his employment;

20 g. ENJOINING Attorney General Becerra from enforcing Cal. Gov’t Code §  
21 3543.1 and Cal. Educ. Code §§ 45060 and 45168 and any other provisions of California  
22 law that require public employees to wait until a specified window of time to stop the  
23 deduction of union dues from their paychecks.

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1 h. Awarding Few his costs and attorneys' fees under 42 U.S.C. § 1988.

2 Dated: October 18, 2019

3 Respectfully submitted,

4 /s/ Mark W. Bucher

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