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SUPREME COURT
FILED

January 20, 2017

JAN 23 2017

The Hon. Chief Justice Tani Cantil-Sakauye
and Associate Justices
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102

Jorge Navarrete Clerk

Deputy

Re: Motion for Posthumous Admission of Sei Fujii to the State Bar of California
On 65th Anniversary of California Supreme Court's
Overturn of California's Alien Land Law,
Fujii v. California, 38 Cal.2d 718 (April 17, 1952)

Movants: Little Tokyo Historical Society; and
Japanese American Bar Association

Dear Chief Justice and Associate Justices:

The Little Tokyo Historical Society and the Japanese American Bar Association (with the support of the attached list of bar and community groups and leaders) respectfully move this Court to posthumously admit Sei Fujii to the State Bar of California.

In 1952, just 10 years after the WWII removal and detention of over 120,000 persons of Japanese ancestry from the West Coast pursuant to Executive Order 9066 (2/3 U.S. citizens by birth),¹ this Court in its seminal decision, *Fujii v. California*, 38 Cal.2d 718 (1952), overturned California's Alien Land Law which denied people of Japanese ancestry, born outside of the United States, the right to "acquire, possess, enjoy, use, cultivate, occupy, transfer, transmit and inherit real property, or any interests therein," in California.² Despite U.S. Supreme Court precedents upholding the constitutionality of the law 30 years earlier,³ this Court boldly noted that:

Constitutional principles declared in recent years are irreconcilable with the reasoning of the earlier cases and lead us to conclude that

¹ Executive Order 9066; *Hirabayashi v. U.S.*, 320 U.S. 81 (1943); *Yasui v. U.S.*, 320 U.S. 115 (1943); *Korematsu v. U.S.*, 323 U.S. 214 (1944); *In re Endo*, 323 U.S. 283, 284-287 (1944).

² See Brant T. Lee, *A Racial Trust: The Japanese YWCA and the Alien Land Law*, 7 UCLA Asian Pac. Am. L.J. 1 (2001) (for synopsis and historical context of California's Alien Land Law).

³ *Porterfield v. Webb*, 263 U.S. 225 (1923).

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³ *Porterfield v. Webb*, 263 U.S. 225 (1923).

the statute violates the equal protection clause of the Fourteenth Amendment. There can be no question that the rights to acquire, enjoy, own and dispose of property are ‘among the civil rights intended to be protected from discriminatory state action by the Fourteenth Amendment,’ and that the power of a state to regulate the use and ownership of land must be exercised subject to the controls and limitations of that amendment. . . . Although Japanese are not singled out by name for discriminatory treatment in the land law, the reference therein to federal standards for naturalization which exclude Japanese operates automatically to bring about that result.⁴

In its lengthy and eloquent majority and concurring opinions, this Court rejected the dissenting view that discrimination of a class by racial ancestry and birthplace could be justified by generalized uncertainty about the class’s loyalty to the United States.⁵

The state asserts that the purpose of the alien land law is to restrict the use and ownership of land to persons who are loyal and have an interest in the welfare of the state. As we shall see later, this is not the true objective of the legislation, but even if it were there is no reasonable relationship between that asserted purpose and the classification on the basis of eligibility to citizenship. Just as eligibility to citizenship does not automatically engender loyalty or create an interest in the welfare of the country, so ineligibility does not establish a lack of loyalty or the absence of interest in the welfare of the country. Nor does it follow that a person has no stake in the economic and social fortune of a state merely because the federal law denies him the right to naturalization. His American-born children are citizens, and, having made his home here, he has a natural interest, identical with that of an eligible alien, in the strength and security of the country in which he makes a living for his family and educates his children.⁶

As these same generalized questions of loyalty based on ancestry and birthplace are raised again today,⁷ we can thank Sei Fujii for his lifelong efforts to combat these biases and for

⁴ *Fujii*, 38 Cal.2d 718, 728-29 (internal citations omitted).

⁵ *Id.* at 766 (“The question is not whether every individual ineligible alien may be said to be disloyal to this nation, but whether the loyalty of such ineligible aliens *as a class* may be doubted”) (emphasis in original) (Schauer, J., dissenting and concurring).

⁶ *Id.* at 732-33.

⁷ Jonah Engel Bromwich, *Trump Camp’s Talk of Registry and Japanese Internment Raises Muslim’s Fears*, N.Y. TIMES, Nov. 17, 2016, available at <http://www.nytimes.com/2016/11/18/us/politics/japanese-internment-muslim-registry.html> (last visited Dec. 8, 2016).

Mr. Fujii's direct challenge to the Alien Land Law that permitted this Court to address these constitutional issues at a critical time in our country's history.⁸

In commemoration of the 65th anniversary of the *Fujii* decision, and in honor of the man who fought against all odds to overturn the Alien Land Law, the Little Tokyo Historical Society and the Japanese American Bar Association respectfully move this Court to posthumously admit Fujii to the State Bar of California.

I. INTRODUCTION

Deep divisions in our national politics⁹ and the demise of public trust in our government, business, and news media institutions¹⁰ remind us that the principles of our collective democracy are fragile and are entirely dependent upon brave individuals willing to stand up for justice for all.

Sei Fujii, a Japanese immigrant, was one such brave individual. In the face of xenophobic laws that denied Japanese aliens citizenship,¹¹ admission to the California bar,¹² and any right to "acquire, possess, enjoy, transmit and inherit real property, or any interest therein" in California,¹³ Fujii persevered, crossed divides, and helped us create a more perfect union.

⁸ See generally, Edwin E. Ferguson, *The California Alien Land Law and the Fourteenth Amendment*, 35 CAL.L.REV 61 (1947) (describing the historical context and arguments for overturning the Alien Land Law on constitutional grounds).

⁹ Pew Research Center, *Political Polarization*, <http://www.pewresearch.org/topics/political-polarization/> (last visited Dec. 7, 2016).

¹⁰ Gallup, *American's Confidence in Institutions Stays Low* (June 13, 2016), <http://www.gallup.com/poll/192581/americans-confidence-institutions-stays-low.aspx> (last visited Dec. 7, 2016).

¹¹ *Ozawa v. U.S.*, 260 U.S. 178, 198 (1922) ("The determination that the words 'white person' are synonymous with the words 'a person of the Caucasian race' simplifies the problem The appellant [a person of the Japanese race born in Japan] . . . is clearly of a race which is not Caucasian and therefore belongs entirely outside the zone on the negative side."); see generally Devon W. Carbado, *Yellow by Law*, 97 CAL.L.REV 633 (2009) (for historical context of *Ozawa* case); see also Charles Gordon, *The Racial Barrier to American Citizenship*, 93 U.Penn.L.Rev. 237, 244 (1945) (Even contemporaneous scholars were troubled by the U.S. Supreme Court's untethered definitions of "white person." "It is difficult to glean from [the U.S. Supreme Court] decisions a dependable formula to aid in determining who are white persons under the naturalization laws. We are informed that the actual color of a man's skin is not decisive, and that we must disregard the teachings of science in attempting to ascertain whether a particular applicant is white. The standard to be applied must conform to the understanding of the common man, based on what 'the average man knows perfectly well.'").

¹² *In re Chang*, 60 Cal.4th 1169, 1170 (2015) (like Hong Yen Chang, Sei Fujii was not a "free white person" and was therefore ineligible for citizenship and ineligible for admission to the California bar); see also Kiyoko Kamio Knapp, *Disdain of Alien Lawyers: History of Exclusion*, 7 Seton Hall Const.L.J. 103 (1996); but see, *In re Garcia*, 58 Cal.4th 440, 445-46 (2014) ("[W]e conclude there is no state law or state public policy that would justify precluding undocumented immigrants, as a class, from obtaining law licenses in California.").

¹³ *Porterfield*, 263 U.S. 225 (upholding California's Alien Land Law as constitutional under the Equal Protection Clause of the 14th Amendment against aliens from Japan because they are ineligible to citizenship under the laws of the United States); see also *Takahashi v. Fish and Game Comm'n*, 334 U.S. 410, 412 n.1 (1948) ("While it is not wholly clear what racial groups other than Japanese are now ineligible to citizenship, it is clear that Japanese are among the few groups still not eligible"); see also *Oyama v. California*, 332 U.S. 633, 665 n.20 (1948) ("Of the 48,158 aliens ineligible for naturalization, 47,305 were Japanese, 749 were Korean, 9 were Polynesian, and 95 belonged to other Asiatic groups."); Edwin Ferguson, *The California Alien Land Law and the Fourteenth*

His story desperately needs to be retold again today. It reminds us of that chapter of American history where we divided our citizens by racial ancestry and incarcerated U.S. born citizens simply because they looked like our enemy.¹⁴ In 1954, after U.S. immigration laws changed, Fujii finally became a citizen. He died 51 days later. But even without citizenship, Fujii lived a patriot's life doing what he could to secure justice for the Japanese community consistent with our American constitutional principles.¹⁵

As voices of division grow louder again today, it is fitting that we celebrate the unifying contributions of Fujii. Without a law license, Fujii risked his life and did more to promote a rule of law consistent with the lofty words of our founders than most with a law license. He teamed with a fellow University of Southern California Law School graduate to marshal the first attack on the California Alien Land Law by pursuing a case to the U.S. Supreme Court that gave Japanese doctors the right to acquire property through a corporation established to build a Japanese community hospital in Los Angeles. He founded a bilingual newspaper and radio show to expose gangsters taking advantage of the Japanese community (getting shot and nearly killed in the process) and to showcase the budding talents of young Japanese Americans contributing to the larger community. He wrote a book on how the Japanese community should respond positively and patriotically to the coming threat of war from Japan. He started a Nisei Week Festival and a Japanese Chamber of Commerce to promote and integrate the Japanese community with the larger community after the war. And he bought property and served as a plaintiff himself to strike the final blow that overturned the California Alien Land Law before the California Supreme Court on due process and equal protection grounds (*Fujii v. California*, 38 Cal.2d 718, 725 (1952)) after the U.S. Supreme Court fell short of declaring the California Alien land law unconstitutional in the case of *Oyama v. California*, 332 U.S. 633 (1948).

Recognizing Sei Fujii's contributions with a posthumous law license will not only right a wrong from the past but, more importantly, it will retell Fujii's story and shine a bright light on the rule of law choices of yesterday and today. Indeed, the *Fujii* opinion itself and the cases leading up to the *Fujii* decision are replete with extensive discussions challenging the notion that there is a reasonable relationship between loyalty to the United States and ancestry or place of birth.¹⁶

Amendment, 35 CAL. L. REV. 61 (1947); Keith Aoki, *No Right to Own?: The Early Twentieth-Century "Alien Land Laws" as a Prelude to Internment*, 40 B.C. L. REV. 37 (1998).

¹⁴ Executive Order 9066; *Hirabayashi*, 320 U.S. 81; *Yasui*, 320 U.S. 115; *Korematsu*, 323 U.S. 214; *In re Endo*, 323 U.S. at 284-287 (1944); Lauren Migaki, *At 92, A Japanese-American Reflects on the Lessons of Internment Camps*, NPR, Morning Edition (Dec. 7, 2016), <http://www.npr.org/2016/12/07/504602293/at-92-a-japanese-american-reflects-on-the-hardships-of-internment-camps> (last visited Dec. 7, 2016); Anti-Defamation League, *Understanding the Civil Liberties Act of 1988*, <http://www.adl.org/assets/pdf/education-outreach/Understanding-the-Civil-Liberties-Act-of-1988.pdf> (last visited Dec. 7, 2016).

¹⁵ Martha Groves, *Little Tokyo Monument Honors Japanese Immigrant Activist Sei Fujii*, L.A. TIMES, Aug. 1, 2015, available at <http://www.latimes.com/local/california/la-me-0802-sei-fujii-day-20150802-story.html> (last visited Dec. 7, 2016).

¹⁶ *Fujii*, 38 Cal.2d at 732 ("The state asserts that the purpose of the alien land law is to restrict the use and ownership of land to persons who are loyal and have an interest in the welfare of the state. As we shall see later, this is not the true objective of the legislation, but even if it were there is no reasonable relationship between that

II. FUJII DENIED ADMISSION TO THE STATE BAR BECAUSE OF HIS PLACE OF BIRTH

In 1911, Sei Fujii graduated from the University of Southern California Law School, but was denied a law license because of his Asian ethnicity and his birth in Japan (in 1882). At the time, only persons who were or could become U.S. citizens were eligible to practice law in California.¹⁷ As an alien Asian, Fujii was ineligible. The Naturalization Act of 1790 only allowed “free white persons” to become naturalized citizens of the United States.¹⁸ This prohibition continued until the McCarran-Walter Act of 1952 repealed the “free white persons” restriction and the Immigration Act of 1965 lifted the numeric restrictions on citizenship of persons from Asia.¹⁹

III. FUJII PARTNERS WITH A LICENSED LAWYER TO SERVE THE PUBLIC

While Fujii could not become a licensed lawyer in California, he befriended a 1913 USC law graduate who could, J. Marion Wright. Wright, the son of an immigrant father, identified with the struggles of the first generation Japanese immigrant population (“Issei”) and teamed with Fujii to serve the Japanese community for the next four decades. Together they defended Japanese farmers accused of selling contaminated produce, represented Japanese families facing devastating injuries and losses, and took on the legal challenges facing the Japanese community in California.²⁰

IV. FUJII AND WRIGHT WHITTLE DOWN THE ALIEN LAND LAW.

The Wright/Fujii team’s greatest achievement arose from their decades-long march to expose the unconstitutionality of the Alien Land Law, which denied real property rights to Japanese in California.²¹ Fueled by anti-Japanese hysteria, California passed and later amended the Alien Land Law of 1913, which prohibited foreign-born persons (particularly Issei Japanese farmers) from owning or long-term leasing land in California.²²

asserted purpose and the classification on the basis of eligibility to citizenship.”); *see also Oyama*, 332 U.S. at 666 (“Loyalty and the desire to work for the welfare of the state, in short, are individual rather than group characteristics. An ineligible alien may or may not be loyal; he may or may not wish to work for the success and welfare of the state or nation. But the same can be said of an eligible alien or a natural born citizen. It is the essence of naiveté to insist that these desirable characteristics are always lacking in a racially ineligible alien As this Court has said, ‘Loyalty is a matter of the heart and mind, not of race, creed, or color.’ . . .”).

¹⁷ *In re Chang*, 84 Cal. 163, 165 (1890); *see also In re Yamashita*, 30 Wash. 234 (1902) (similarly denying a Japanese alien applicant admission to the Washington state bar on the same grounds).

¹⁸ Act of Mar. 26, 1790, ch. 3, § 1, 1 Stat. 103; *Ozawa*, 260 U.S. at 198 (Japanese person not a “free white person”).

¹⁹ L. Scott Smith, *From Promised Land to Tower of Babel: Religious Pluralism and the Future of the Liberal Experiment in America*, 45 BRANDEIS L.J. 527, 532, n.66 (2007).

²⁰ Janice Marion Wright LaMoree, *J. Marion Wright: Los Angeles’ Patient Crusader 1890-1970 – Part 2*, DISCOVER NIKKEI* JAPANESE MIGRANTS AND THEIR DESCENDANTS (March 26, 2010).

<http://www.discovernikkei.org/en/journal/2010/3/26/3356/> (last visited Dec. 14, 2016).

²¹ *Oyama*, 332 U.S. at 636.

²² *Fujii*, 38 Cal.2d at 735, 743.

The team's first attack on the Alien Land Law came in connection with an attempt to establish a hospital for the Japanese community. The 1918 influenza epidemic in California took many Japanese lives in Southern California because the seven Japanese physicians serving the Japanese community did not have hospital privileges at non-Japanese hospitals and could not admit their Japanese patients into these non-Japanese hospitals.²³

In response, in 1926, five alien Japanese physicians filed articles of incorporation to form a corporation to acquire land for a new hospital to serve the Japanese community. The California Secretary of State rejected their corporate filing.²⁴

The Wright/Fujii team attacked this denial by creatively invoking a Treaty with Japan and took their challenge up to the U.S. Supreme Court where, in 1928, the Court opined that California's Alien Land Law cannot be used to restrict the physicians from forming a corporation to lease land and build a hospital in the Boyle Heights community of Los Angeles (*Jordan v. Tashiro*, 278 U.S. 123 (1928)). This monumental win allowed the Japanese community to raise over \$100,000 to build the hospital just as the 1929 stock market crash darkened the nation.²⁵

Thirteen years later, Pearl Harbor was bombed. Japanese on the West Coast were removed pursuant to the 1942 Executive Order 9066 and the State of California began using the Alien Land Law to acquire, by escheatment, land previously held by the removed Japanese families.²⁶ Although Executive Order 9066 did not mention Japanese (nor was it interpreted to similarly require exclusion and incarceration of all Germans or Italians from the West Coast whose ancestral countries were also at war with the U.S.), West Coast military commanders used Executive Order 9066 and unsubstantiated rumors of espionage and sabotage by the Japanese community to justify a targeted round up and removal of all persons of Japanese ancestry from the West Coast.²⁷ On just a few days' notice, persons of Japanese ancestry were ordered to abandon their homes, abandon their businesses, abandon their property, and report to detention centers without any due process and without committing any crime.²⁸

In the wake of these detentions, California used its Alien Land Laws to escheat to the State of California real property previously held by persons of Japanese ancestry.²⁹

²³ Janice Marion Wright LaMoree, *J. Marion Wright: Los Angeles' Patient Crusader 1890-1970 – Part 3*, DISCOVER NIKKEI* JAPANESE MIGRANTS AND THEIR DESCENDANTS (April 2, 2010), <http://www.discovernikkei.org/en/journal/article/3357/> (last visited Dec. 14, 2016).

²⁴ *Id.*

²⁵ Los Angeles Conservancy, Explore L.A., Historic Places, *Japanese Hospital*, <https://www.laconservancy.org/locations/japanese-hospital> (last visited Dec. 14, 2016).

²⁶ *Oyama*, 332 U.S. at 635-639; Ferguson, 35 CAL.L.REV. at 61-73.

²⁷ Executive Order 9066; *Hirabayashi*, 320 U.S. 81; *Yasui*, 320 U.S. 115; *Korematsu*, 323 U.S. 214; *In re Endo*, 323 U.S. at 284-287.

²⁸ RICHARD REEVES, INFAMY: THE SHOCKING STORY OF THE JAPANESE-AMERICAN INTERNMENT IN WORLD WAR II 39-90 (Henry Holt and Co., LLC 2015).

²⁹ *Oyama*, 332 U.S. at 637.

V. OYAMA FALLS SHORT OF OVERTURNING ALIEN LAND LAW

In the case of *Oyama v. California*, the property at issue was the Oyama family farm in San Diego. Title to the farm was held in the name of a minor son born in the U.S.³⁰ The U.S. Supreme Court reversed the California Supreme Court's approval of California's escheatment of this property and held that California's Alien Land Law could not justify taking the property from Oyama's minor son – a U.S. citizen by birth. Although the majority opinion does not mention or reach the constitutional issues, several concurring opinions directly raised and asserted the unconstitutionality of the California Alien Land Law.³¹

Shortly after the *Oyama* decision, the U.S. Supreme Court reversed another California Supreme Court decision upholding the denial of a fishing license to a Japanese fisherman (*Takahashi v. Fish and Game Commission*, 334 U.S. 410 (1948)). When presented with authorities supporting such denials in alien land ownership cases, the majority opinion, cited *Oyama* and questioned the constitutional validity of California's Alien Land Law.³²

VI. FUJII AND WRIGHT USE CONSTITUTION TO STRIKE FINAL BLOW

Within a month after the *Takahashi* decision, Sei Fujii, still an alien unable to become a U.S. citizen, took up the challenge laid down by the U.S. Supreme Court opinions in *Oyama* and *Takahashi* and purchased a house and lot to directly challenge California's Alien Land law.³³ When directly presented with the constitutionality of California's Alien Land Law, the California Supreme Court used the U.S. Supreme Court's reversal in *Oyama* and *Takahashi* to reject earlier U.S. Supreme Court cases upholding the Alien Land Law and ruled the law unconstitutionally violated the due process and equal protection clauses of the Fourteenth Amendment. *Fujii v. California*, 38 Cal.2d 718, 725 (1952).

³⁰ *Id.* at 635-641; see generally, Rose Cuison Vallazor, *Rediscovering Oyama v. California: At the Intersection of Property, Race, and Citizenship*, 87 WASH.U.L.REV. 979 (2010) (discussing historical and legal context of *Oyama* case).

³¹ In a concurring opinion by Justice Black with Justice Douglas concurring, Justice Black argued forcefully that the Alien Land Law should be overturned as unconstitutional:

Hence the basic vice, the constitutional infirmity, of the Alien Land Law is that its discrimination rests upon an unreal racial foundation. It assumes that there is some racial characteristic, common to all Japanese aliens, that makes them unfit to own or use agricultural land in California. There is no such characteristic. None has even been suggested. The arguments in support of the statute make no attempt whatever to discover any true racial factor. They merely represent social and economic antagonisms which have been translated into false racial terms. As such, they cannot form the rationalization necessary to conform the statute to the requirements of the *equal protection clause of the Fourteenth Amendment*. [Italics original.] Accordingly, I believe that the prior decisions of this Court giving sanction to this attempt to legalize racism should be overturned.

Oyama, 332 U.S. at 672.

³² *Takahashi*, 334 U.S. at 412 n.1, 422 n.9.

³³ U.S. National Parks Service, *A History of Japanese Americans in California: Historic Sites: Sei Fujii Property, Sei Fujii v. State of California*, https://www.nps.gov/parkhistory/online_books/5views/5views4h81.htm (last visited Dec. 7, 2016).

After the McCarran-Walter Act of 1952 repealed the “free white persons” immigration restriction, Fujii became a U.S. citizen in 1954 and died 51 days later.³⁴

VII. FUJII CHALLENGED AMERICA WITH UNDERSTANDING AND RESPECT

Even without a law license, Fujii devoted his life to challenging America to stand up to its highest ideals.³⁵ He founded a bilingual newspaper – Kashu Mainichi (“California Daily News”) – to expose dark criminal activity within the Japanese community – and was shot by gangsters only to be saved at the Japanese Hospital he helped establish. He started a radio program – KRKD – that celebrated the bright accomplishments of young Japanese Americans (“Nisei”) to bridge understanding between generations and with the larger English speaking community.³⁶ He later initiated the Nisei Week Festival in Little Tokyo to promote understanding and commerce between the Japanese and larger community. And he wrote a book – *Japan/US Relationship and Advice for the Japanese in America* – to cool down the hostility between the U.S. and Japan in the lead up to WWII. At the close of WWII, Fujii organized the Japanese Chamber of Commerce of Southern California and served as its President to again promote understanding, respect, and empathy among the Japanese and non-Japanese communities.

* * *

For the foregoing reasons, the Little Tokyo Historical Society and the Japanese American Bar Association are now seeking posthumous admission to the State Bar for Sei Fujii to help retell this historic story of how constitutional doctrines and the life-long grit of Sei Fujii overturned xenophobic hostility and the California Alien Land Law 65 years ago.

Thank you for considering this motion.

Very truly yours,

McGuireWoods LLP

By: 

Sidney Kanazawa

³⁴ Densho Encyclopedia, Greg Robinson, *Fujii v. California* (Sept. 4, 2014), <http://encyclopedia.densho.org/Fujii%20v.%20California/> (last visited Dec. 7, 2016).

³⁵ USC Gould, School of Law, Kelsey Schreiber, *Alum’s Inspiring Story* (Feb. 26, 2013), <http://gould.usc.edu/press/article.cfm?newsid=3981> (last visited Dec. 7, 2016).

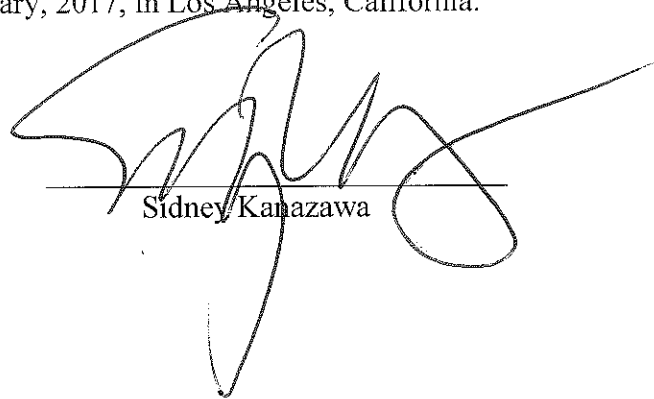
³⁶ Lil Tokyo Reporter, History, <http://www.ltreporter.com/blog/history/> (last visited Dec. 7, 2016).

VERIFICATION

I, Sidney Kanazawa, declare under penalty of perjury of the laws of the State of California:

I am an attorney at law duly admitted and licensed to practice before all courts of the State of California. I am a partner in the law firm of McGuireWoods LLP, counsel for the Little Tokyo Historical Society and the Japanese American Bar Association in the foregoing motion, and I make this verification for and on behalf of these organizations. I have read the foregoing Motion for Posthumous Admission of Sei Fujii to the State Bar. I am informed and believe that the facts stated in the motion and attached exhibits are true and correct.

Executed on this 20th day of January, 2017, in Los Angeles, California.



Sidney Kanazawa

Bar Association and Community Supporters

Set forth below are the bar associations, community organizations, and individuals that have pledged their support of the Motion for Posthumous Admission of Sei Fujii to the State Bar:

1. Al Muratsuchi, Assembly Member, Sixty-Sixth District
2. American College of Trial Lawyers
3. Arizona Asian American Bar Association
4. Asian American Advancing Justice - Asian Law Caucus
5. Asian American Bar Association of Chicago
6. Asian American Bar Association of Houston
7. Asian American Bar Association of New York
8. Asian American Legal Foundation
9. Asian Americans Advancing Justice - Los Angeles
10. Asian Law Alliance
11. Asian Pacific American Bar Association
12. Asian Pacific American Bar Association of Central Ohio
13. Asian Pacific American Bar Association of Maryland
14. Asian Pacific American Bar Association of Pennsylvania
15. Asian Pacific American Women Lawyers Alliance
16. Association of Corporate Counsel (ACC)
17. ACC - Sacramento Chapter
18. ACC - San Francisco Bay Area Chapter
19. ACC – Southern California Chapter
20. Aviam Soifer, Dean, University of Hawaii Richardson School of Law
21. B. Mark Fong, Partner, Minami Tamaki LLP
22. Chinese for Affirmative Action
23. Civil Rights Education and Enforcement Center
24. Connecticut Asian Pacific American Bar Association
25. Dale Minami, Esq., Partner, Minami Tamaki LLP
26. Dallas Asian American Bar Association
27. Donald Tamaki, Esq., Partner, Minami Tamaki LLP
28. Equal Rights Advocates
29. Eric K. Yamamoto, Fred T. Korematsu Professor of Law and Social Justice, University of Hawaii Richardson School of Law
30. Filipino American Lawyers Association of Chicago
31. Georgia Asian Pacific American Bar Association
32. Go For Broke National Education Center
33. Greater Orlando Asian American Bar Association
34. Historic Wintersburg
35. Institute for Inclusion in the Legal Profession
36. Italian American Bar Association of Northern California
37. Janice Fukai, Alternate Public Defender for Los Angeles County
38. Japanese American Bar Association
39. Japanese American Citizens League
40. Japanese American Cultural & Community Center

41. Japanese American National Museum
42. Jeff Adachi, Public Defender of San Francisco
43. Korean American Bar Association of Georgia
44. Korean American Bar Association of Southern California
45. Korean American Lawyers Association of Greater New York
46. Little Tokyo Historical Society
47. Little Tokyo Service Center
48. Los Angeles County Asian American Employees Association
49. Los Angeles County Board of Supervisors
50. Michael Meyer, Chairman – Los Angeles Offices, DLA Piper LLP (President-Elect Los Angeles County Bar Association)
51. Mike Feuer, Los Angeles City Attorney
52. Minnesota Asian Pacific American Bar Association
53. Missouri Asian American Bar Association
54. National Asian Pacific American Bar Association
55. National Asian Pacific Islander Prosecutors Association
56. National Bar Association
57. National Conference of Vietnamese American Attorneys
58. National Filipino American Lawyers Association
59. Orange County Asian American Bar Association
60. Oregon Asian Pacific American Bar Association
61. Philippine American Bar Association
62. San Francisco Chapter of the American Board of Trial Advocates
63. San Francisco Trial Lawyer Association
64. South Asian Bar Association of Southern California
65. Supervisor Hilda Solis, Los Angeles County Supervisor for the First District
66. Supervisor Janice Hahn, Los Angeles County Supervisor for the Fourth District
67. Taiwanese American Lawyers Association
68. Thai American Bar Association
69. The Bar Association of San Francisco
70. The California Chapters of the American Board Of Trial Advocates
71. Tuna Canyon Detention Station
72. USC Gould School of Law

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Cindy Bischof, declare:

At the time of service, I was over 18 years of age. I am employed in the County of Los Angeles, State of California. My business address is 1800 Century Park East, 8th Floor, Los Angeles, CA 90067.

On January 20, 2017, I served true copies of the following document described as:

MOTION FOR POSTHUMOUS ADMISSION OF SEI FUJII TO THE STATE BAR

on the interested party as follows:

**The State Bar of California
180 Howard Street
San Francisco, CA 94105**

BY MAIL: I enclosed the document in a sealed envelope or package addressed to the persons at the address listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 20th day of January, 2017 in Los Angeles, California.


Cindy Bischof