No. 21-480

IN THE
Supreme Court of the United States

WILLIAM D. BRICE,
Petitioner,

v.

CALIFORNIA FACULTY ASSOCIATION,
Respondent.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit

JOINT BRIEF IN OPPOSITION

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Mosaic - (301) 927-3800 - Cheverly, MD

CHE' S. COOK, ET AL.,

Petitioner,

v.

OREGON AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES COUNCIL 75,

Respondent.

WILLIAM HOUGH,

Petitioner,

v.

SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,

Respondent.

STEVEN MASUO, ET AL.,

Petitioners,

v.

AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES INTERNATIONAL UNION, AFL-CIO, ET AL.,

Respondents.

QUESTION PRESENTED

Whether unions can be held liable for retrospective monetary relief under 42 U.S.C. § 1983 for receiving and spending agency fees to pay for collective bargaining representation prior to *Janus v. AFSCME Council 31*, 138 S. Ct. 2448 (2018), even though such fees were authorized by state law and constitutional under then-controlling Supreme Court precedent.

CORPORATE DISCLOSURE STATEMENT

None of the Respondents has a parent corporation, and no publicly held company owns any stock in any Respondent.

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INTRODUCTION

The lower courts, including the court below, have unanimously and correctly held that unions are not subject to retrospective monetary liability in suits under 42 U.S.C. § 1983 for having collected agency fees prior to *Janus v. AFSCME Council 31*, 138 S. Ct. 2448 (2018), in accordance with state law and this Court's then-controlling precedent. Since January of this year, this Court has denied 12 petitions for certiorari that raised the same question presented here.[1] There have been no developments in the short time since those denials that would make the four non-precedential rulings below worthy of this Court's review. This petition should also be denied.

STATEMENT OF THE CASE

A. Background

The petition arises from four separate cases filed in California (*Brice, Hough*) and Oregon (*Cook, Masuo*).

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[1] *Leitch v. AFSCME Council 31*, __ S. Ct. __, 2021 WL 4508516 (Oct. 4, 2021); *Solomon v. AFSCME Council 37*, __ S. Ct. __, 2021 WL 4508657 (Oct. 4, 2021); *Seidemann v. Prof'l Staff Congress Local 2334*, __ S. Ct. __, 2021 WL 4507809 (Oct. 4, 2021); *Doughty v. State Emps.' Ass'n of N.H.*, 141 S. Ct. 2760 (2021); *Diamond v. Pa. St. Educ. Ass'n*, 141 S. Ct. 2756 (2021); *Wholean v. CSEA SEIU Local 2001*, 141 S. Ct. 1735 (2021); *Janus v. AFSCME Council 31*, 141 S. Ct. 1282 (2021); *Mooney v. Ill. Educ. Ass'n*, 141 S. Ct. 1283 (2021); *Danielson v. Inslee*, 141 S. Ct. 1265 (2021); *Casanova v. Machinists Local 701*, 141 S. Ct. 1283 (2021); *Lee v. Ohio Educ. Ass'n*, 141 S. Ct. 1264 (2021); *Ogle v. Ohio Civ. Serv. Emps. Ass'n*, 141 S. Ct. 1265 (2021).

California and Oregon, like many other states, allow public employees to organize and bargain collectively with their employer, through a representative organization of their choosing, over the terms and conditions of their employment. Under state law, the chosen representative has a duty to represent in good faith all bargaining unit workers in negotiating and administering contracts, including workers who are not union members.

Prior to this Court's decision in *Janus*, unions were authorized by applicable state law to collect agency fees through payroll deductions from bargaining unit employees who were not union members, to cover the nonmembers' share of the costs of collective bargaining representation. At the time, agency fee requirements were constitutional under *Abood v. Detroit Board of Education*, 431 U.S. 209 (1977), which held that the First Amendment allows public employers to require employees to pay their proportionate share of the costs of union collective bargaining representation but prohibits requiring nonmembers to pay for a union's political or ideological activities. *Id.* at 235–36.

On June 27, 2018, this Court issued its decision in *Janus*. *Janus* considered the same First Amendment challenge to agency fees rejected in *Abood*. *Janus* recognized that the lower court had "correctly" dismissed that challenge as "foreclosed by *Abood*." 138 S. Ct. at 2462. But *Janus* concluded that *Abood* had erred in holding that agency fees are consistent with the First Amendment, and this Court held that *Abood* "is now overruled" and agency fee requirements "cannot be allowed to continue." 138 S. Ct. at 2486.

Petitioners are public employees who, prior to *Janus*, paid agency fees to the unions that represented their bargaining units. Petitioners' public employers and union representatives immediately complied with this Court's *Janus* decision by ceasing all deductions of agency fees. *See, e.g.*, App. 17–22. Petitioners did not contend that they had paid any agency fees after *Janus*.

B. Proceedings below

Petitioners filed these four cases shortly before or after this Court's decision in *Janus*. Petitioners sued the unions that represent their bargaining units as well as other labor organizations with which those unions are affiliated. Petitioners alleged that they (and putative class members) are entitled under 42 U.S.C. § 1983 to repayment of all agency fees collected prior to *Janus*.

The four district courts below each dismissed petitioners' claims. App. 10–53. As pertinent here, the four district courts concluded that unions that received agency fees prior to this Court's decision in *Janus* could assert the good-faith defense available to private parties under Section 1983 because the unions had relied on state law and then-controlling Supreme Court precedent. *See* App. 22–31, 42–46.[2]

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[2] The district court in *Brice* relied on its earlier decision rejecting indistinguishable claims in *Babb v. California Teachers Association*, 378 F. Supp. 3d 857 (C.D. Cal. 2019). App. 11. The district court in *Hough* also relied on the reasoning of prior district court decisions rejecting indistinguishable claims. App. 33–34.

Ninth Circuit panels affirmed the four district courts' judgments in brief, non-precedential decisions. App. 1–9. The Ninth Circuit relied on its prior decision in *Danielson v. Inslee*, 945 F.3d 1096 (9th Cir. 2019), *cert. denied,* 141 S. Ct. 1265 (2021), which had issued while three of the district court judgments were on appeal. *Danielson* held that because the collection of pre-*Janus* agency fees "was sanctioned not only by state law, but also by directly on-point Supreme Court precedent, . . . the good faith defense shields [unions] from retrospective monetary liability" under Section 1983 for having collected and spent such fees. *Danielson,* 945 F.3d at 1104.

REASONS FOR DENYING THE PETITION

This petition presents the narrow question of whether unions that received and spent agency fees prior to *Janus* in accordance with state law and this Court's then-controlling precedent are liable for retrospective monetary relief under 42 U.S.C. § 1983. Since *Janus*, seven courts of appeals and more than 30 district courts have unanimously answered that question in the negative. The non-precedential decisions that petitioners ask this Court to review reach the same outcome as all those prior decisions. There is no conflict to resolve.

Further, the unique circumstances that gave rise to post-*Janus* claims for repayment of agency fees are unlikely to recur, so the question presented by the facts here is unlikely to have widespread significance. This Court only rarely overrules its prior precedents, and private parties seldom face monetary claims under Section 1983 for engaging in conduct that was

authorized by state law and by directly on-point Supreme Court precedent.

This Court already has denied 12 petitions for certiorari that raised the same question presented here. *See supra* at 1 n.1. One of those petitions sought review of the same Ninth Circuit opinion that controlled the outcome in these cases. *See Danielson v. Inslee*, 141 S. Ct. 1265 (2021). Three of those petitions were denied on October 4, 2021. Given the continued, unbroken consensus in the lower courts, there remains no reason for this Court to intervene.

I. The lower courts unanimously have held that unions are not subject to retrospective monetary liability under Section 1983 for having collected pre-*Janus* agency fees.

Petitioners contend that this Court should grant their petition in order to resolve a purported "conflict." Pet. 18. There is no conflict to resolve. The Ninth Circuit's non-precedential decisions below are entirely consistent with this Court's precedents and reach the same conclusion as every other decision about pre-*Janus* liability.

1. In *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982), this Court held that private parties who invoke state-created laws and processes may, in certain circumstances, be considered state actors subject to liability under Section 1983. *Id.* at 936–37. The Court acknowledged that its construction of Section 1983 created a "problem"—namely, that "private individuals who innocently make use of seemingly valid state laws" could be sued for monetary relief "if the law is

subsequently held to be unconstitutional." *Id.* at 942 n.23. The Court suggested that this problem "should be dealt with not by changing the character of the cause of action but by establishing an affirmative defense." *Id.*

Ten years later, *Wyatt v. Cole*, 504 U.S. 158 (1992), held that private-party defendants in Section 1983 litigation are not entitled to the same form of immediately appealable qualified immunity that is available to public officials. *Id.* at 167. The Court acknowledged, however, that "principles of equality and fairness may suggest . . . that private citizens who rely unsuspectingly on state laws they did not create and may have no reason to believe are invalid should have some protection from liability," and the Court explained that its decision did not "foreclose the possibility that private defendants faced with § 1983 liability under *Lugar* . . . could be entitled to an affirmative defense based on good faith and/or probable cause." *Id.* at 168–69.

Since *Wyatt*, the eight courts of appeals to consider the question have uniformly held that private parties may assert a good-faith defense to Section 1983 claims for monetary relief. The Fifth Circuit squarely considered the issue on remand from this Court in *Wyatt*, holding that "private defendants sued on the basis of *Lugar* may be held liable for damages under § 1983 only if they failed to act in good faith in invoking the unconstitutional state procedures." *Wyatt v. Cole*, 994 F.2d 1113, 1118 (5th Cir. 1993), *cert. denied*, 510 U.S. 977 (1993). In *Jordan v. Fox, Rothschild, O'Brien & Frankel*, 20 F.3d 1250, 1276 (3d Cir. 1994), the Third Circuit expressed its agreement with the Fifth Circuit's holding, and the First, Second, Fourth, Sixth,

Seventh, and Ninth Circuits have all since reached the same conclusion. *See Pinsky v. Duncan*, 79 F.3d 306, 311–12 (2d Cir. 1996); *Vector Research, Inc. v. Howard & Howard Att'ys, P.C.*, 76 F.3d 692, 698–99 (6th Cir. 1996); *Clement v. City of Glendale*, 518 F.3d 1090, 1097 (9th Cir. 2008); *Janus v. AFSCME Council 31*, 942 F.3d 352, 361–64 (7th Cir. 2019) (*Janus II*); *Doughty v. State Emps.' Ass'n of N.H.*, 981 F.3d 128, 133–37 (1st Cir. 2020); *Akers v. Md. State Educ. Ass'n*, 990 F.3d 375, 379–80 (4th Cir. 2021).

That consensus extends to the specific claim for pre-*Janus* agency fees being pursued by petitioners here. Numerous lawsuits similar to petitioners' were filed throughout the country following issuance of the *Janus* decision. The outcome of each of those lawsuits has been the same: Every court has concluded that unions' reliance on then-valid state laws and then-binding precedent of this Court precludes monetary relief under Section 1983. That consensus includes nine published decisions from seven different courts of appeals.[3] It also includes more than 30 district court decisions. *See Mattos v. AFSCME Council 3*, 2020 WL

[3] *Akers*, 990 F.3d 375 (4th Cir. 2021); *Doughty*, 981 F.3d 128 (1st Cir. 2020), *cert. denied*, 141 S. Ct. 2760 (2021); *Diamond v. Pa. St. Educ. Ass'n*, 972 F.3d 262 (3d Cir. 2020), *cert. denied*, 141 S. Ct. 2756 (2021); *Wholean v. CSEA SEIU Local 2001*, 955 F.3d 332 (2d Cir. 2020), *cert. denied*, 141 S. Ct. 1735 (2021); *Ogle v. Ohio Civ. Serv. Emps. Ass'n*, 951 F.3d 794 (6th Cir. 2020), *cert. denied*, 141 S. Ct. 1265 (2021); *Lee v. Ohio Educ. Ass'n*, 951 F.3d 386 (6th Cir. 2020), *cert. denied*, 141 S. Ct. 1264 (2021); *Danielson*, 945 F.3d 1096 (9th Cir. 2019), *cert. denied*, 141 S. Ct. 1265 (2021); *Janus II*, 942 F.3d 352 (7th Cir. 2019), *cert. denied*, 141 S. Ct. 1282 (2021); *Mooney v. Ill. Educ. Ass'n*, 942 F.3d 368 (7th Cir. 2019), *cert. denied*, 141 S. Ct. 1283 (2021).

2027365, at *2 n.3 (D. Md. Apr. 27, 2020) (citing most of these cases).

No circuit court has held that private-party defendants sued on the basis of *Lugar* are *not* entitled to assert a good-faith defense to Section 1983 monetary liability. Indeed, Respondents are not aware of *any* decision by *any* court to that effect.

2. In a futile effort to establish a conflict, petitioners suggest that the lower courts' decisions all "ignore the Court's holding in *Janus*." Pet. 18. To the contrary, the consensus in the lower courts is consistent with this Court's analysis of reliance interests in *Janus*. This Court considered in *Janus* whether reliance interests justified retaining *Abood* as a matter of stare decisis, 138 S. Ct. at 2478–86, and this Court acknowledged that unions had entered into existing collective bargaining agreements with the understanding that future agency fees would help pay for collective bargaining representation. *Id.* at 2484. The Court concluded that unions' reliance interests in the continued enforcement of those agreements were not sufficiently weighty to justify retaining *Abood*. *Janus*, 138 S. Ct. at 2478–86. The Court never suggested, however, that its decision would expose public employee unions to massive retrospective monetary liability for having followed the Court's then-governing precedent. *See id.* at 2486.

Petitioners also urge that the lower courts' decisions conflict with this Court's caselaw about whether Section 1983 claims require proof of the defendant's "state of mind." Pet. 18–20. The issue addressed by the decisions below, however, is not what elements are necessary to establish liability under Section 1983 but

whether unions that followed state law and this Court's then-controlling precedent have a good-faith *defense* to retrospective monetary liability. Moreover, this Court has never decided whether Section 1983 claims against private parties based on the First Amendment should require proof of scienter, so there could be no conflict.

II. Petitioners' merits arguments have already been found insufficient to justify review.

Petitioners urge that review is justified because the Ninth Circuit purportedly erred on the merits by rejecting their Section 1983 claims. Pet. 20–30. There was no error.[4] In any event, this Court generally does not grant review solely to correct purported errors in a decision below, especially a non-precedential decision.

Moreover, these merits arguments already have been found insufficient to justify review. Although

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[4] Petitioners contend that the application of a good-faith defense is inconsistent with *Owen v. City of Independence*, 445 U.S. 622 (1980). But *Owen* addressed only qualified immunity, not a good-faith defense. This Court subsequently explained in *Wyatt* that the absence of qualified immunity for private parties does not foreclose a good-faith defense. *See supra* at 6. Moreover, while petitioners criticize the Ninth Circuit's decision in *Danielson* for considering principles of "equality and fairness," this Court used the same phrase in *Wyatt*, 504 U.S. at 168, and the Ninth Circuit also reasoned that the application of a good-faith defense to claims for pre-*Janus* agency fees is justified by common law analogies. *Danielson,* 945 F.3d at 1100–02; *see also* Brief in Opposition 14–21, *Ogle v. Ohio Civ. Serv. Emps. Ass'n*, No. 20-486 (explaining why the good-faith defense is firmly grounded in this Court's analysis in *Lugar* and *Wyatt*).

petitioners criticize the petition in *Danielson*, Pet. 3 n.1, one of the two advocacy organizations that filed this petition also joined the petition in *Danielson*, and the other advocacy organization that filed this petition has also filed eight other petitions raising the same question about pre-*Janus* liability, including two petitions denied on October 4, 2021. *See supra* at 1 n.1 (*Solomon*, *Leitch*, *Doughty*, *Diamond*, *Wholean*, *Janus II*, *Casanova*, *Ogle*). There have been no relevant legal developments since that time that would support a different outcome here.

III. There is no other justification for this Court's intervention.

Petitioners contend that review of the decisions below is justified because many lawsuits were filed against unions seeking damages for agency fees collected prior to *Janus*. Pet. 31. As stated already, however, every court to consider such a claim has held that the union defendants are not subject to Section 1983 monetary liability. Far from suggesting this Court's guidance is required, the broad consensus that Section 1983 claims for pre-*Janus* agency fees are meritless demonstrates that this Court's involvement is unnecessary.

The unique circumstances presented by cases seeking to impose pre-*Janus* monetary liability also do not provide a suitable vehicle for this Court to provide guidance on the application of the good-faith defense in other cases, as petitioners request. Pet. 30–31. The Ninth Circuit held only that private parties who followed "*directly on-point Supreme Court precedent*" were not liable for monetary damages.

Danielson, 945 F.3d at 1104 (emphasis added). Such situations are likely to be rare.

Stare decisis is "a 'foundation stone of the rule of law.'" *Allen v. Cooper*, 140 S. Ct. 994, 1003 (2020) (quoting *Michigan v. Bay Mills Indian Cmty.*, 572 U.S. 782, 798 (2014)). This Court seldom overrules its precedents. Moreover, this Court has held that when a precedent of this Court is directly on point, that precedent is the law of the land binding on all lower courts, even if subsequent decisions have criticized that precedent. *Agostini v. Felton*, 521 U.S. 203, 237 (1997). These cases—in which the private-party defendants were acting in accordance not only with the requirements of state law but also with this Court's governing precedent—would not provide a suitable vehicle for this Court to consider the potential application of a good-faith defense to more typical situations.

CONCLUSION

The petition for certiorari should be denied.

Respectfully submitted,

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