



**ANIMAL RIGHTS HAWAII
ADVOCATES FOR ANIMALS**

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COURT OF APPEALS

November 11, 2002

Honorable Ronald M. George, Chief Justice
And Associate Justices
California Supreme court
303 Second Street, South Tower
San Francisco, CA. 91407-1317

RE: Friedman v. Southern California Permanente, et al.
California Supreme Court No. S110916

Dear Chief Justice George and Associate Justices,

I am submitting this letter in support of Mr. Friedman's Petition for Review in the Supreme Court, on behalf of Animal Rights Hawaii (ARH), a non-profit animal rights organization. ARH believes that the Court should hear the case based on its merits. Please note however, that this petition is not about animal rights. It is about recognizing secular religions, morals, and/or ethics as functionally equivalent to "traditional religions", and giving recognition to Ethical Veganism as a religion.

ARH believes that the Court should hear this matter because its review is necessary to settle important questions of law, including the definitions of "religion", "religious beliefs", and "religious creed". Ethical Veganism cannot be equated with mere vegetarianism, or even with veganism. Those who are Ethical Vegans believe that all living beings are valuable in their own right, not just as tools for "use" by human animals. We believe that it is immoral and unethical for humans to kill animals for food, clothing, or product testing. Just as Mr. Friedman refused to be injected with a vaccine made of animal products, other Ethical Vegans refuse to take Premarin which is made from the urine of horses. Of course, there are numerous other examples. However, the use of animals in this way leads to immeasurable suffering and painful death, which is immoral and not ethically acceptable to Ethical Vegans.

Ethical Vegans hold their beliefs with the same force of "traditional" religious beliefs such as Christianity, Judaism, or the Muslim faith. Our judicial system must not limit religious beliefs just because they do not follow the more commonly recognized religions. Non-traditional religious beliefs are every bit as worthy, and those who practice these beliefs must not be discriminated against. The Supreme Court has the opportunity to set forth a much needed new rule of law with regard to the definition of religious creed.



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Ethical Vegans have strong beliefs in what is right and wrong, moral or immoral, ethical or unethical. They also need to be protected. Our religious, ethical beliefs have been well documented in the works of Peter Singer and Tom Regan, among others. We believe that Ethical Veganism qualifies as a religious belief under FEHA. Protection from discrimination on the basis of these beliefs is fundamental in our Constitutional form of government in this country.

Therefore, in the hope of the furtherance of justice and religious freedom, we respectfully ask that the petition be granted.

Sincerely Yours,

Pamela Davis
Board Member and Officer, Animal Rights Hawaii
2464-A Pali Highway
Honolulu, Hawaii 96817

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing _____ and know its contents.

CHECK APPLICABLE PARAGRAPHS

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____

a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on _____, at _____, California.

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

Type or Print Name

Signature

PROOF OF SERVICE

1013a (9) CCP Revised 5/1/88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of LOS ANGELES, State of California.

I am over the age of 18 and not a party to the within action; my business address is: 11040 SANTA MONICA BOULEVARD, SUITE 320, LOS ANGELES, CA 90025-7515

On, November 21, 2002 I served the foregoing document described as ANIMAL RIGHTS HAWAI'I ADVOCATES FOR ANIMALS AMICUS CURIAE LETTER DATED NOVEMBER 11, 2002 IN SUPPORT OF SUPREME COURT GRANTING REVIEW

on the interested parties in this action

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:

by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

I deposited such envelope in the mail at LOS ANGELES, California.

The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing.

Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at LOS ANGELES California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on November 21, 2002, at LOS ANGELES, California.

(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on November 21, 2002, at LOS ANGELES, California.

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

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

SCOTT D. MYER, ESO.

Type or Print Name

Signature

(BY MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG) (FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

PROOF OF SERVICE MAILING LIST
FOR AMICUS LETTERS

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FOUNDATION HEALTH PLAN,
INC.)

COURT OF APPEALS
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Los Angeles, CA 90013

(Appellate Court)

LOS ANGELES SUPERIOR COURT
Hon. Cesar C. Sarmiento, Judge
Attn.: Court Clerk
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Los Angeles, CA 90012

(Court Appealed From)

LOS ANGELES SUPERIOR COURT
Hon. Ronald M. Sohigian, Judge
Attn.: Court Clerk
111 North Hill Street
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(Court Appealed From)