



Family Law Appeals Involving Domestic Violence Issues

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Who is FVAP?

- A nonprofit agency dedicated to appealing cases in California on behalf of survivors of domestic violence.
- We:
 - ▣ Represent clients in appeals.
 - ▣ File amicus briefs in cases of statewide importance.
 - ▣ Train attorneys, DV advocates, and judges on issues pertinent to appeals.
 - ▣ Assist pro per litigants (people without representation).
 - ▣ Work with law students to become the next generation of advocates.
 - ▣ Provide technical assistance to attorneys, advocates, and pro per litigants.
 - ▣ Seek publication of case law clarifying DV law.

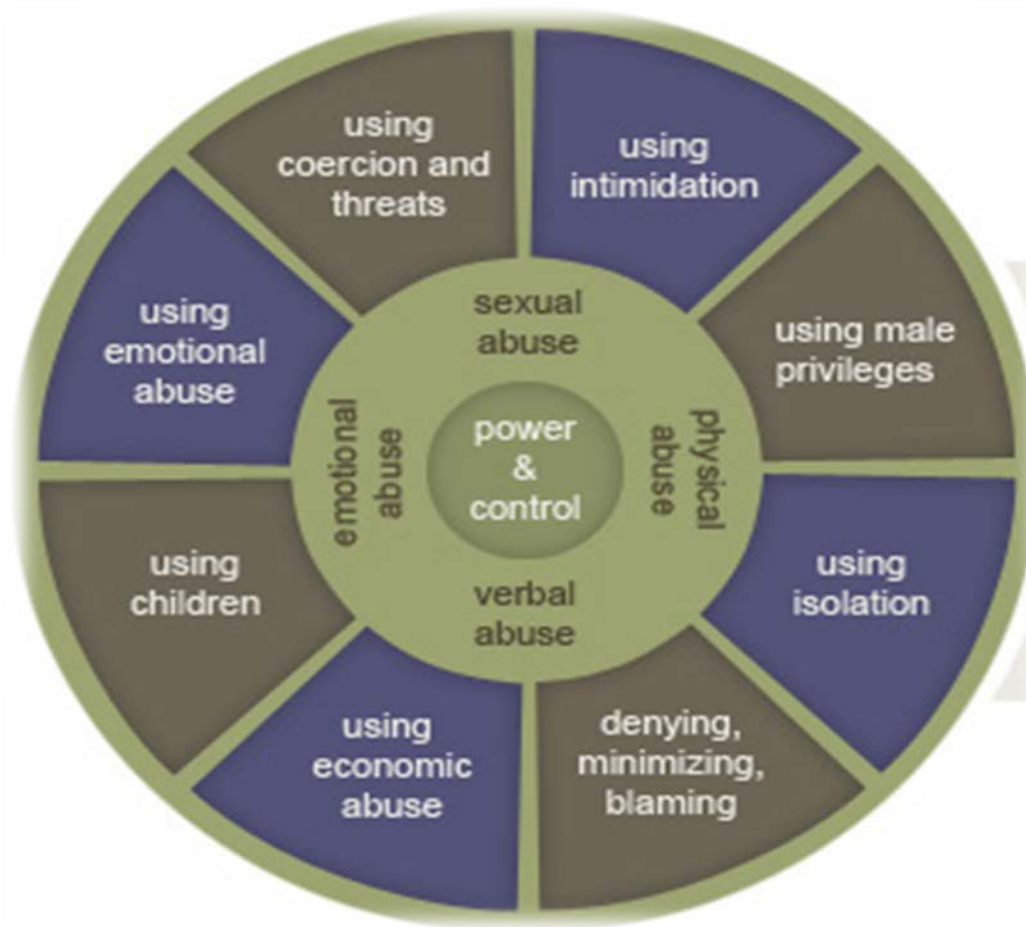
Overview

- How to identify domestic violence issues in family law cases?
- Which orders are appealable?
- Which orders must be reviewed by writ?
- What is the difference between discretionary and statutory writs?
- What standards of review apply to family law appeals?
- What legal issues arise in domestic violence cases and how do they appear in appeals?

Identifying Domestic Violence Issues in Family Law Cases

- Emphasize attorney-client confidential relationship
- Ask open-ended, non-judgmental questions
 - ▣ How has the relationship been over time? Any cyclical patterns?
 - ▣ Is there anything else about the dynamics between you that I need to know to understand what's happening in your life?
- Don't forget about non-physical forms of abuse: psychological/verbal (e.g., put-downs), economic, isolation, using children as threats
- Excessive litigation may be a sign of litigation abuse
- Don't minimize

Identifying Domestic Violence Issues in Family Law Cases



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Which Orders Are Appealable?

- Pre-Judgment
- Interlocutory Orders
- Final Judgments
- Post-Judgment
- Custody Orders

Pre-Judgment Orders

- No Statute, No Appeal.
- Appeal can only be taken from an appealable order as defined in statutes and developed by the case law.
- Generally pre-judgment orders are not appealable unless final orders such as for support or for a DVPA order issued in a dissolution case (injunction).

Support Orders

- A direct appeal lies from temporary support and attorney fee orders, whether granting or denying relief.
 - *IRMO Skelley* (1976) 18 Cal.3d 265, 268

DVPA Restraining Orders

- Denial or Granting of an injunctive order is appealable.
 - ▣ C.C.P., section 904.1, subdivision (a)(6).
 - ▣ *Nakamura v. Parker* (2007) 156 Cal.App.4th 327, 332

Interlocutory Orders

- Interlocutory judgments and orders are generally **not** appealable.
 - ▣ C.C.P., section 904.1, subdivision (a)(1)(A).
 - ▣ Determine some, but not all, of the rights of the parties to the litigation (e.g., the determination of only one issue in a bifurcated trial).
 - ▣ “One-final-judgment rule”
 - *IRMO Nicholson & Sparks* (2002) 104 Cal.App.4th 289

Interlocutory Orders: Collateral Orders

- Some interlocutory judgments and orders (i.e., **“collateral” orders**) are appealable.
 - ▣ C.C.P., section 904.1, subdivisions (a)(8), (a)(9) & (a)(11).
 - ▣ Although they do not dispose of all issues in the case, collateral orders are considered “final” for appeal purposes and are exceptions to the one-final-judgment rule.

Interlocutory Orders: Collateral Orders (cont.)

□ Criteria:

- *Bank of California v. Thornton-Blue Pacific, Inc.* (1997) 53 Cal.App.4th 841, 845-846
- 1. The order is **collateral** to the subject matter of the litigation (on an issue separate from the general subject of the litigation)
- 2. The order is **final** as to the collateral matter (not preliminary to later proceedings),
- 3. “[T]here is no other opportunity to review the order by appeal.”
- 4. The order “direct[s] the payment of money by appellant or the performance of an act by or against him.”
 - *Sjoberg v. Hastorf* (1948) 33 Cal.2d 116, 119

Interlocutory Orders: Collateral Orders (cont.)

- Examples of appealable **collateral orders**:
 - ▣ Permanent or final support orders, even if modifiable in the future; modifiable is not the same as non-final.
 - *IRMO de Guigne* (2002) 97 Cal.App.4th 1353
 - ▣ Judgment terminating marital status only, provided an objection was made at trial.
 - *IRMO Fink* (1976) 54 Cal.App.3d 357
 - Family Code section 2341, subdivision (b)

Final Judgments

- **Final judgments are appealable.**
 - ▣ C.C.P., section 904.1, subdivision (a)(1).
 - ▣ Finally and completely adjudicates the rights **all of the parties to the action**, leaving **nothing further** to be done in the way of judicial action.
 - ▣ E.g., divorce judgments, restraining order petitions granted/denied, final custody or support orders.

Final Judgments (cont.)

- It is the **effect** of the ruling, and not the name given to it, that determines whether it is appealable.
 - ▣ *Kinoshita v. Horio* (1986) 186 Cal.App.3d 959, 962-963 (*Kinoshita*)
- “Statements of Decision” are **not** judgments, but may be treated as such if clearly intended to be the court’s final decision on the merits.
 - ▣ *Pangilinan v. Palisoc* (2014) 227 Cal.App.4th 765, 769

Post-judgment Orders

- **Orders** after final judgment are appealable.
 - ▣ C.C.P., section 904.1, subdivision (a)(2).
 - ▣ Includes post-judgment (e.g., post-divorce) custody modification.
 - *Enrique M. v. Angelina V.* (2004) 121 Cal.App.4th 1371, 1377–1378

Custody Orders

- Appealability depends on the nature of order.
 - ▣ Temporary vs. final
 - ▣ Writ vs. appeal
- “[O]f all issues, child custody is perhaps the most time-sensitive (and hence least amenable to an adequate remedy by way of appeal).”
 - ▣ *Alan S., Jr. v. Superior Court (Mary T.)* (2009) 172 Cal.App.4th 238, 250

Custody Orders (cont.)

- ❑ **Pre-judgment** orders **temporarily** determining child custody and visitation during litigation generally are **not** appealable, because they are intended to be superseded by a permanent order.
 - ❑ *Lester v. Lennane* (2000) 84 Cal.App.4th 536
- ❑ Not “collateral” order when:
 - ❑ Does not order either party to pay money or act, or
 - ❑ Custody is the only disputed issue in the case (e.g., just a custody proceeding).

Custody Orders (cont.)

- **Post-judgment** (e.g., post-divorce or restraining order) custody orders **may** be appealable, even if “temporary.”
 - C.C.P., section 904.1, subdivision (a)(2)
 - Previously, case law implied these orders were not appealable if preliminary to later custody proceedings.
 - But a court recently held any post-judgment temporary custody order is appealable.
 - *IRMO Harris* (Jan. 10, 2014, G047229) [nonpub. opn.]
- **Tip:** It is the **effect** of the ruling, and not the name given to it, that determines whether it is appealable.
 - *Kinoshita, supra*, 186 Cal.App.3d at pp. 962-963

Custody Orders (cont.)

- Some appellate courts have considered temporary custody orders nonetheless.
- For instance:
 - ▣ When the order will determine outcome of the rest of the proceeding, or
 - ▣ When the trial court had no jurisdiction to make the order.

Temporary Custody Orders

- What if you want to challenge a temporary custody order?
 - ▣ Review case law to see if your type of temporary order has been considered on appeal before.
 - ▣ Is the order really “temporary?” Consider, for instance, whether:
 - A later review hearing was set, or
 - Review hearings are continuously set without making changes.
 - ▣ Even if not appealable, it may be challenged by an emergency writ.
 - ▣ **Tip:** Try to get “final” custody orders (or, at least not labeled “temporary”) for appeal—if it won’t prejudice your client.

Petitions for Writ: Four Types

- Writ of Mandate = Correct an abuse of discretion or compel performance of a ministerial duty.
- Writ of Prohibition = Prevent a threatened judicial act in excess of jurisdiction.
- Writ of Certiorari = To correct a completed judicial act in excess of jurisdiction.
- Writ of Supersedeas = Stay a proceeding.

Petitions for Writ: Common Law

- Must Show:
 - ▣ No adequate remedy at law,
 - ▣ Irreparable injury,
 - ▣ Error or abuse of discretion, and
 - ▣ Exceptional circumstances. For instance:
 - Issue of great public importance requiring prompt resolution, or
 - Constitutional rights are implicated.

Petitions for Writ: Examples

- Decision about TRO or DVRO:
 - ▣ If truly urgent circumstances exist and clear error occurred.
- Custody:
 - ▣ Seek a stay in conjunction with an appeal of a custody order, especially if the order permits relocation or international travel.

Petitions for Writ: Examples (cont.)

- Excessive continuances:
 - ▣ If a TRO remains in place
 - Protected Party Argument
 - Restrained Party Argument
- Insurance:
 - ▣ If the trial court denies a requested order requiring insurance to be maintained, this creates urgency to support a writ petition.

Petitions for Writ: Examples (cont.)

- Support:
 - ▣ Support orders are directly appealable, but given the delay if your client faces exigent circumstances, a writ may be appropriate.
- Residence exclusion:
 - ▣ Given the urgent and dramatic nature of the order, a writ may be appropriate.
- Discovery rulings:
 - ▣ For instance, an order requiring disclosure of information that is arguably privileged.

Petitions for Writ: Statutory Writs

- Motion to change venue:
 - ▣ Granting or denying.
 - ▣ Twenty-day deadline.
 - ▣ Stayed during writ proceeding.
- Motion to quash service:
 - ▣ If papers are not properly served.
 - ▣ If no personal jurisdiction.
 - ▣ Only if denied (if granted, then review is by appeal).
 - ▣ Ten-day deadline.

Petitions for Writ: Statutory Writs

- Motion to dismiss for inconvenient forum:
 - ▣ Only if denied (if granted, then review is by appeal).
 - ▣ If papers are not properly served.
 - ▣ If no personal jurisdiction.
 - ▣ Ten-day deadline.
- Disqualification of a judge for cause or peremptory challenge:
 - ▣ Granting or denying.
 - ▣ Exclusive means of review.
 - ▣ Ten-day deadline.

Writ Process: Filing a Petition

- Caption:
 - ▣ *[Your Client] vs. Superior Court of [County]*
 - ▣ With the other party being a “Real Party in Interest.”
- All rules governing appellate briefing apply (e.g., word limit, font, etc.).
- Must include record with filing.
- No strict deadline, but must be ASAP and within a “reasonable” amount of time.

Writ Process: *Palma* Notice

- Typically appellate courts either summarily deny (with no written opinion) or issue a so-called “*Palma* notice.”
 - ▣ *Palma v. U.S. Industrial Fasteners, Inc.* (1984) 36 Cal.3d 171

Writ Process: *Palma* Notice (cont.)

- The other side has typically 15 days to file a response and then the appellate court typically rules quickly, either summarily granting or denying.
 - ▣ If denied, there is no opinion.
 - ▣ If granted, there is a short order.

Writ to Salvage a Premature Appeal

- *Harshad & Nasir Corporation v. Global Sign Systems, Inc.* (Aug. 15, 2017, B269427, B275942, B275947) [nonpub. opn] [2017 WL 3484761] (*Harshad*)
 - ▣ Two of the several parties in the case appealed fee orders. (*Id.* at p. *1.)
 - ▣ The issue was whether the fees incurred in court to confirm an arbitration award were recoverable under an arbitration fee-shifting statute. (*Ibid.*)

Writ to Salvage a Premature Appeal (cont.)

- *Harshad, supra*, B269427, B275942, B275947
 - ▣ A fee order “is ordinarily appealable . . . [but] the orders in this case contemplate that the parties would return to the arbitrator for a determination of the amount.” (*Id.* at p. *17.)
 - ▣ The trial court order was found to be “ ‘preliminary to future proceedings’ and, therefore, not appealable.” (*Ibid.*)

Writ to Salvage a Premature Appeal (cont.)

- *Harshad, supra*, B269427, B275942, B275947
 - “In extraordinary circumstances,” and “in the interest of justice and judicial economy,” “[the appellate court] may deem a purported appeal from an unappealable order as a petition or writ of mandate.” (*Id.* at p. *17.)
 - Resolving issue may reduce future fees. (*Ibid.*)

Standards of Review: Three Types

- De novo
- Abuse of discretion
- Substantial evidence

Standards of Review: De Novo

- No deference given to the trial court
- Examples:
 - ▣ Legal questions
 - ▣ Mixed question of law and fact, where the question is predominantly legal
 - *Morgado v. City & County of San Francisco* (2017) 13 Cal.App.5th 1, 5-6

Standards of Review: De Novo (cont.)

□ Examples:

▣ Statutory application to facts of case

- *IRMO Feldman* (2007) 153 Cal.App.4th 1470, 1479; see *Enrique M. v. Angelina V.* (2004) 121 Cal.App.4th 1371, 1378 (implementing custody orders)

▣ Statutory and constitutional interpretation

- *County of Orange v. Superior Court* (2007) 155 Cal.App.4th 1253, 1258 [“whether the Family Court correctly interpreted the scope of its authority...under the relevant statutes”]

Standards of Review: De Novo (cont.)

□ Examples:

- Whether a trial court applied the correct legal standard to an issue when exercising its discretion.
 - Applying incorrect criteria in DV restraining order request (requiring probability of future abuse). *Rodriguez v. Menjivar* (2015) 243 Cal.App.4th 816, 823.
 - Applying incorrect legal standard in DVRO renewal request (requiring likelihood of future *physical* abuse). *Eneaji v. Ubboe* (2014) 229 Cal.App.4th 1457
 - *Gonzalez v. Munoz* (2007) 156 Cal.App.4th 413, 420-421

Standards of Review: Abuse of Discretion

- High degree of deference to the trial court
- Appellate courts will affirm unless the trial court's ruling exceeds the bounds of:
 - ▣ Reason (i.e., no reasonable court could have ruled as such), or
 - ▣ The law (i.e., not staying within the bounds of discretion granted by statutes, case law, and constitutional principles).

Standards of Review: Abuse of Discretion (cont.)

- Examples:
 - Custody and visitation orders
 - Grant or denial of DV restraining orders
 - Modification of child support
 - Determining earning capacity

Standards of Review: Abuse of Discretion (cont.)

- **Examples: Exceeding bounds of reason**
 - ▣ Denying restraining order renewal given history of abuse. (*Cueto v. Dozier* (2015) 241 Cal.App.4th 550.)
 - ▣ Child custody: No reasonable basis on which court could believe its decision was in best interest of child. (*IRMO Burgess* (1996) 13 Cal.4th 25)

Standards of Review: Abuse of Discretion (cont.)

- **Examples: Exceeding bounds of law**
 - ▣ **Applying incorrect legal criteria (e.g., requiring showing of ongoing harassment) to DV restraining order renewal.** (*Perez v. Torres-Hernandez* (2016) 1 Cal.App.5th 389, 396-397) (“misunderstanding of the applicable legal principles”)
 - ▣ **Denying DV restraining order without a hearing.** (*Nakamura, supra*, 156 Cal.App.4th at p. 337) (this “exceeded the discretion vested in the judiciary by the DVPA”)

Standards of Review: Abuse of Discretion (cont.)

- Examples: Exceeding bounds of law
 - ▣ Awarding joint custody without applying F. C. section 3044 presumption against custody to a perpetrator of DV. (*IRMO Fajota* (2014) 230 Cal.App.4th 1487)
 - ▣ Rebutting F.C. section 3044 presumption based on improper criteria of frequent and continuing contact. (*Ellis v. Lyons* (2016) 2 Cal.App.5th 404)

Standards of Review: Substantial Evidence

- Most deferential standard of review
- Applies to trial court's:
 - ▣ Factual findings
 - ▣ Weighing of the evidence
 - ▣ Credibility determinations

Standards of Review: Substantial Evidence

- Must be no substantial evidence supporting the trial court's conclusion to reverse
 - ▣ “The issue is not whether there is evidence in the record to support a different finding, but whether there is some evidence that, if believed, would support the findings of the trier of fact.” (*IRMO Fregoso & Hernandez* (2016) 5 Cal.App.5th 698.)

Standards of Review: Substantial Evidence

- Testimony of one witness (e.g., DV survivor) can be substantial evidence. (See *Fregoso, supra*, 5 Cal.App.5th 698.)
- On appeal, “testimony may be rejected only when it is inherently improbable or incredible, i.e., unbelievable *per se*, physically impossible or wholly unacceptable to reasonable minds.” (*Nevarez v. Tonna* (2014) 227 Cal.App.4th 774; *IRMO Burgess* (1996) 13 Cal.4th 25.)

Standards of Review

- *Mark T. v. Jamie Z.* (2011) 194 Cal.App.4th 1115, 1124-25
 - “A discretionary order that is based on the application of improper criteria or incorrect legal assumptions is not an exercise of informed discretion, and is subject to reversal even though there may be substantial evidence to support that order.”

Ancillary Issues

- What should you do if the trial court refuses to hear ancillary requests in DVPA cases?
- Preserve the issues for appeal. Here's how:
 - ▣ Raise the issue.
 - ▣ Press for a ruling.
 - ▣ Object on the record to the court's ruling.
 - ▣ Make sure you presented evidence that would support your request (e.g., proposed calculations for support or debt relief based on filed Income and Expense declarations).

Support: Interplay with DV Cases

□ F.C. section 6341

- ▣ Trial court may, in its discretion, award child and spousal support in DV cases.
- ▣ Trial court “shall” consider whether failure to award support may jeopardize the safety of the petitioner and/or the children, including safety concerns related to the financial needs of the petitioner and/or the children.

Support: Interplay with DV Cases (cont.)

- Award of spousal support in a DV case may only be payable from Respondent to Petitioner.
 - ▣ If Respondent wants support, they must file a separate dissolution or legal separation case.
 - ▣ Spousal support may be awarded prior to the finding of abuse.
 - *IRMO J.Q & T.B.* (2014) 223 Cal.App.4th 687

Support: Interplay with DV Cases (cont.)

- No spousal support to spouse convicted of attempted murder of other spouse.
 - ▣ F.C. section 4324
- No spousal support where spouse convicted of violent sexual felony.
 - ▣ F.C. section 4324.5, subdivision (a)
 - ▣ No discretion.
 - ▣ Only applies if the divorce is filed within 5 years of the conviction and any time served in custody.

Support: Interplay with DV Cases (cont.)

- No Spousal Support where spouse convicted of violent sexual felony.
 - ▣ F.C. section 4324.5, subdivision (a)
 - ▣ Injured spouse cannot be ordered to pay attorney fees of the other out of separate property (but attorney fees for both can be paid from community property).
 - ▣ At the request of the injured spouse, the date of separation shall be the date of the incidence or earlier.
 - ▣ Injured spouse receives 100% of their retirement assets.

Support: Interplay with DV Cases (cont.)

- Where there is a criminal conviction of “an act of domestic violence” within 5 years prior to the filing for divorce, “there shall be a rebuttable presumption affecting the burden of proof” against an award of spousal support to the abusive spouse.
 - ▣ F.C. section 4325
 - ▣ “Section 4235 embodies a legislative determination that victims of domestic violence not be required to finance their own abuse.”
 - *IRMO Cauley* (2006) 138 Cal.App.4th 1100, 1107

Support: Interplay with DV Cases (cont.)

- A history of domestic violence and criminal conviction must be considered in awarding, reducing or eliminating permanent spousal support, regardless of the passage of time.
- ▣ F.C. section 4320(i)-Documented evidence, including a plea of nolo contendere, of any history of domestic violence, as defined in Section 6211, between the parties or perpetrated by either party against either party's child, including, but not limited to, consideration of emotional distress resulting from domestic violence perpetrated against the supported party by the supporting party, and consideration of any history of violence against the supporting party by the supported party.

Support: Interplay with DV Cases (cont.)

□ Mandatory Findings

- “[T]he court shall make specific **factual findings** with respect to the **standard of living** during the marriage, and, at the request of either party, the court shall make appropriate **factual determinations** with respect to **other circumstances.**”
 - F.C. section 4332 (emphasis added)
- Additionally, the court must consider all of the F.C. section 4320 factors, else reversible error.
 - F.C. section 4320

Attorney Fees Awards

- Non-marital DVPA case:
 - ▣ F.C. section 6344
 - ▣ Trial court **may** issue an award of attorney fees in a domestic violence proceeding, only to the prevailing party.
 - ▣ Requires notice and a hearing.
 - ▣ Discretionary, except that if Petitioner prevails, the court **shall**, if appropriate based on the parties' respective abilities to pay, order Respondent to pay fees.
 - ▣ Includes fees for commencing and maintaining the proceeding.

Attorney Fees Awards

- *Faton v. Ahmedo* (2015) 236 Cal.App.4th 1160, 1169-70:
 - ▣ Party may request attorney's fees even if not requested in her initial restraining order application.
 - ▣ Attorney's fees request need not be decided with the restraining order petition.
 - ▣ Public Policy Rationale: to encourage attorneys to step in and accept a case even after the petition has been filed. You can still request attorney's fees!

Attorney Fees Awards

Family Code § 2030/2032: Dissolution/Nullity/Legal Separation Proceeding & Proceedings after entry of a related judgment:

- **The court SHALL ensure that each party has access to legal representation, including access early in the proceedings,** to preserve each party's rights by ordering, if necessary based on the income and needs assessments, one party, to pay to the other party, or to the other party's attorney, whatever amount is reasonably necessary for attorney's fees and for the cost of maintaining or defending the proceeding during the pendency of the proceeding. (§ 2030(a)(1).)
 - **Pendente lite fees are therefore available.**
 - **Pro Per Litigants may request fee award to retain an attorney.**
- **The primary purpose of section 2030** is to level the playing field and ensure access to legal representation. (*IRMO Cryer* (2011) 198 Cal.App.4th 1039, 1056; *IRMO Braud* (1996) 45 Cal.App.4th 797, 827.)

Attorney Fees Awards (cont.)

- **When a request for attorney's fees and costs is made, the court SHALL make findings on:**
 - ▣ Whether an award of attorney's fees and costs under this section is appropriate,
 - ▣ Whether there is a disparity in access to funds to retain counsel, AND
 - ▣ Whether one party is able to pay for legal representation of both parties.
 - ▣ **If the findings demonstrate disparity in access and ability to pay, the court SHALL make an order awarding attorney's fees and costs.**

Attorney Fee Awards

- Reviewed for abuse of discretion – deferential review
- *But*, whether court applied correct legal standard is de novo review
- Record must show court actually considered the statutory factors in F.C. section 2030 – failure to consider statutory factors is an abuse of discretion. (*IRMO Keech* (1999) 75 Cal.App.4th 860; *Alan S. v. Superior Court* (2009) 172 Cal.App.4th 238.)
- F.C. section 2030 has mandatory “shall” language for court findings – easier to isolate appealable issue
- Record must show court actually exercised its discretion – (*IRMO Tharpe* (2010) 188 Cal.App.4th 1295.) (failure to review any billing records)

How FVAP Can Help You

- If you're representing a DV survivor pro bono, or are a legal aid attorney, FVAP offers:
 - ▣ Co-counseling appeals
 - ▣ Free trainings on www.fvaplaw.org/resources-training
 - ▣ Free tip sheets & toolkits (same website)
 - ▣ Free technical assistance about trial- or appellate-level DV cases
 - ▣ Sign up to be on our pro bono list to co-counsel appeals prepare for moot courts

FVAP's Case Criteria

1. The client is a survivor of domestic violence.
2. The case originated in California family, civil, or probate court (e.g., dissolution, post-judgment, custody, parentage, Domestic Violence Prevention Act, civil harassment, immigration, and guardianship matters), or in California state or federal court under the Hague Convention on the Civil Aspects of International Child Abduction.
3. There is a final order from the trial court.

Thank You!

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This project was supported by funding awarded by the United States Department of Justice, Victims of Crime Act, 2015-VA- GX-0058, through the California Governor's Office of Emergency Services. This project was supported by Grant Number 2016-WL- AX-0055, awarded by the Office on Violence Against Women, U.S. Department of Justice. The opinions, findings, conclusions and recommendations expressed in this publication are those of the authors and do not necessarily reflect the views of the Department of Justice, Office on Violence Against Women.





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- Thank you again for watching. This webinar is now concluded.