

**MINUTES OF THE PROGRAM OF THE APPELLATE COURTS SECTION
OF THE LOS ANGELES COUNTY BAR ASSOCIATION**

Tuesday, May 28, 2019
4:30 p.m. to 6:00 p.m.
Manatt Phelps LLP
11355 West Olympic Blvd.
Los Angeles, California 90064

**“Using Theme and Mechanics to Make Your Point on Appeal: Effective
Writing Techniques”**

Presenters: Justice Martin Tangeman, 2DCA, Division 6
Katy Graham, Senior Appellate Court Attorney, 2DCA, Division 6

The Program

Section Chair Sarvenaz Bahar announced upcoming LACBA events, including the June 5 networking event between the Appellate Courts Section and the Litigation Section and the June 27 LACBA Installation and Awards Dinner. Section Vice Chair Jens Koepke presented Sarvenaz with an appreciation plaque for her two-years of service as section Chair. Sarvenaz introduced the incoming section officers: Chair Jens Koepke; Vice Chair Kent Bullard; Secretary George Abele; and Treasurer Julia Shear Kushner. Sarvenaz then introduced the panelists, Justice Tangeman and Senior Appellate Court Attorney Katy Graham of the California Court of Appeal Second Appellate District, Division Six.

During the program, Justice Tangeman and Ms. Graham provided an introduction to the attributes and components of effective appellate briefs, including effective advocacy, efficiency, and structural clarity. They then covered a number of effective brief writing techniques, including how to: sequence issues; structure issues; map the points; sequence arguments covering different types of tests – including elements, steps, and factors; and root arguments in law and fact by using record facts and legal authorities. The presenters explained the goal of effective brief writing as providing the court with a blueprint for the appellate opinion.

The written program materials consisted of a printed PowerPoint outlining the presentation plus additional handout materials consisting of a model argument outline, a chart of suggested “unassailable authority” for legal arguments, and a

