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Attorneys for Petitioner

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

NONHUMAN RIGHTS PROJECT, INC.,  
on behalf of BILLY and TINA, individuals,

Petitioner,

v.

The CITY OF LOS ANGELES, and  
DENISE M. VERRET in her official  
capacity as Los Angeles Zoo and Botanical  
Gardens Chief Executive Officer & Zoo  
Director,

Respondents.

Case No. 25CJHC00060-01

**MOTION FOR LEAVE TO FILE A  
SUPPLEMENTAL PETITION FOR  
WRIT OF HABEAS CORPUS;  
DECLARATION OF  
CHRISTOPHER BERRY IN  
SUPPORT; MEMORANDUM AND  
POINTS OF AUTHORITIES IN  
SUPPORT; [PROPOSED ORDER]**

Judge: Hon. William C. Ryan  
Department: Writs Center 1

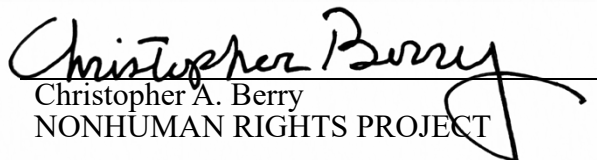
1 Petitioner Nonhuman Rights Project, Inc. (hereafter NhRP), by and  
2 through undersigned counsel, requests that this Court grant leave to file a  
3 supplemental petition herein. The proposed Supplement to Verified Petition for  
4 Common Law Writ of Habeas Corpus (hereafter Supplemental Petition) is  
5 attached as **Exhibit A**.

6 On May 21, 2025, NhRP discovered that Asian elephants Billy and Tina—  
7 the subjects of the above-entitled matter—were shipped from the Los Angeles  
8 Zoo and Botanical Gardens (hereafter L.A. Zoo) to the Tulsa Zoo in Oklahoma.  
9 This new information was not in the original Verified Petition for Common Law  
10 Writ of Habeas Corpus (hereafter Petition) filed on May 20, 2025. The  
11 information was discovered after the filing of the Petition, and the additional  
12 grounds raised in the proposed Supplemental Petition are proper, reflecting the  
13 change in circumstances.

14 This motion is made pursuant to Code Civ. Pro. § 464, Penal Code § 1473,  
15 the Declaration of Christopher Berry, the exhibit lodged herein, the Memorandum  
16 of Points and Authorities, and case law. *Board of Prison Terms v. Superior Court*  
17 (2005) 130 Cal.App.4th 1212, 1235 (“To bring additional claims before the court,  
18 petitioner must obtain leave to file a supplemental petition for writ of habeas  
19 corpus.”) (citation omitted).

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21 DATED: May 28, 2025

Respectfully submitted,

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24 Christopher A. Berry  
NONHUMAN RIGHTS PROJECT

25 Attorney for Petitioner  
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Case No. 25CJHC00060-01

**MEMORANDUM OF POINTS  
AND AUTHORITIES IN  
SUPPORT OF MOTION FOR  
LEAVE TO FILE A  
SUPPLEMENTAL PETITION**

Judge: Hon. William C. Ryan  
Department: Writs Center 1


A court entertaining a petition for writ of habeas corpus has the authority to consider “amended or supplemental habeas corpus petitions in the interests of justice.” *Board of Prison Terms v. Superior Court* (2005) 130 Cal. App. 4th 1212, 1239. “Our Supreme Court has emphasized that the goal of ‘the procedures that govern habeas corpus is to provide a framework in which a court can discover the truth and do justice in [a] timely fashion.’” *Id.* (quoting from *People v. Duvall* (1995) 9 Cal.4th 464, 482).

Filed on May 20, 2025, the Verified Petition for Common Law Writ of Habeas Corpus pending before this Court seeks relief for Billy and Tina, two

1 autonomous and extraordinarily cognitively complex individuals who were  
2 previously confined at the L.A. Zoo. On May 21, 2025, the L.A. Zoo announced  
3 that Billy and Tina had arrived at the Tulsa Zoo in Oklahoma. Declaration of  
4 Christopher Berry in Support of Petitioner's Motion to File a Supplemental  
5 Petition ¶ 2. In the interests of justice, Petitioner seeks leave to file the proposed  
6 Supplement to Verified Petition for Common Law Writ of Habeas Corpus to  
7 reflect the change in circumstances. See Berry Decl., Exhibit A.

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10 DATED: May 28, 2025

Respectfully submitted,

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13 Christopher A. Berry  
NONHUMAN RIGHTS PROJECT

14 Attorney for Petitioner  
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