IN THE SUPREME COURT OF THE STATE OF ALASKA

In the Matter of the Necessity of the Hospitalization of N.B.	)	Supreme Court No. S-15859
Trial Court Case No. **3AN-15-00204 PR**		
In the Matter of the Necessity of the Hospitalization of L.M.	)	Supreme Court No. S-16467
Trial Court Case No. **3AN-16-01656 PR**		

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SUPPLEMENTAL BRIEF OF APPELLEE STATE OF ALASKA

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SUPPLEMENTAL BRIEFING ISSUES

In an order dated July 26, 2017, the Court requested supplemental briefing on the following questions:

1. Applying the standards employed by this court for overturning precedent, was *Wetherhorn*'s mootness holding originally erroneous or is it no longer sound because of changed conditions, and, if so, will more harm than good result from overruling this holding? As part of this analysis, the parties are requested to address the time and effort spent litigating on appeal the application of the mootness doctrine and its various exceptions. *See also In re Reid K.*, 357 P.3d 776, 782-83 (Alaska 2015) (directing that in future appeals from involuntary commitments, the State should move to dismiss the appeal if it believes the appeal is moot and no exceptions to mootness apply).

2. Does this court's mootness jurisprudence in involuntary commitment cases deprive the trial courts of significant precedent and guidance in their decision-making?

3. Does the public interest exception, as formulated and applied in *Wetherhorn* and subsequent involuntary commitment and involuntary medication cases, meaningfully protect a respondent's right to appellate review of involuntary commitment and involuntary medication orders?

4. Does the collateral consequences exception, as formulated and applied in *Joan K.* and subsequent involuntary commitment and involuntary medication cases, meaningfully protect a respondent's right to appellate review of involuntary commitment and involuntary medication orders?

INTRODUCTION

The Court has asked, essentially, whether it can overrule *Wetherhorn*'s mootness holding under the standard for overcoming stare decisis. The answer is yes. The State has consistently raised and briefed mootness in civil commitment appeals—attempting to apply the Court's existing caselaw—ever since the Court ordered the parties to address mootness in *Joan K.* But the State recognizes that *Wetherhorn*'s mootness holding creates extra work and practical problems with little apparent corresponding benefit. For this reason, the State does not oppose the Court reconsidering that holding and reaching the merits of all civil commitment appeals.

LEGAL BACKGROUND

For reasons that are not clear to the State, this Court appears to have heard only one civil commitment appeal in the decades between 1981—when most of the current civil commitment statutes were enacted—and 2006.[1] But as soon as the Court began receiving civil commitment appeals in the mid-2000s, the Court began grappling with mootness. Mootness naturally comes up in civil commitment appeals because commitment orders usually expire before an appeal is ripe for decision.

In the Court's first civil commitment appeal dealing with mootness, *Myers v. Alaska Psychiatric Institute*, the appellant challenged the constitutionality of the State's

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[1] The State's counsel was able to locate only one civil commitment opinion from this Court before 2006, *In the Matter of the Necessity of the Hospitalization of K.M.L.*, 626 P.2d 574 (Alaska 1981), and that case addressed whether a person may be involuntarily committed based on "mental retardation" rather than mental illness. It is possible the Court received other commitment appeals before 2006 that, for whatever reason, did not result in published opinions available on Westlaw.

involuntary medication statutes, and the State argued that the appeal should be dismissed because the involuntary medication order being appealed was no longer in effect.[2] The Court agreed that the appeal was technically moot, but reached its merits under the public interest exception to mootness because of "the importance of the issues [the appellant] raises, their likelihood of recurring, and their ability to evade timely appellate review."[3]

The next year, in *Wetherhorn v. Alaska Psychiatric Institute*, the Court issued its first decision declining to hear part of a civil commitment appeal on mootness grounds.[4] The State's brief did not raise mootness,[5] and the Court reached the merits of the appellant's constitutional challenges to the relevant statutes and procedures without mentioning mootness.[6] But the Court decided that the appellant's argument "that the evidence presented at the hearing was insufficient to establish that she met the standards for commitment" was moot and that the public interest exception to mootness did not apply because these "factual questions are not capable of repetition."[7]

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2 138 P.3d 238, 244 (Alaska 2006).

3 *Id.* at 245.

4 156 P.3d 371 (Alaska 2007).

5 *See* Brief of Appellee in *Wetherhorn v. Alaska Psychiatric Institute*, No. S-11939, 2006 WL 1496887 (Jan. 31, 2006).

6 156 P.3d at 375-80.

7 *Id.* at 380-81.

For the next several years following *Wetherhorn*, the Court discussed mootness in each civil commitment appeal that came before it, but ultimately considered at least a portion of each appeal under the public interest exception.[8]

In the 2012 commitment appeal *In re Joan K.*, the State did not raise or mention mootness. But the Court, *sua sponte*, ordered the parties to file supplemental briefing on mootness.[9] Ever since this supplemental briefing order in *Joan K.*, the State has considered itself obligated to raise and brief mootness in civil commitment appeals.[10]

In *Joan K.*, after the Court's prompting, the State argued that the appeal was moot and did not meet any exceptions to the mootness doctrine.[11] The appellant argued that her appeal met either the public interest exception—because the facts of her commitment could be analogous to a future case—or the collateral consequences exception—because even an expired civil commitment order can cause problems such as restrictions on

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8 *See Wayne B. v. Alaska Psychiatric Institute*, 192 P.3d 989, 990-91 (Alaska 2008) (considering, under the public interest exception, an appeal point about the need for a transcript of the master's hearing); *Bigley v. Alaska Psychiatric Institute*, 208 P.3d 168, 179 (Alaska 2009) (considering, under the public interest exception, appeal points about due process and statutory interpretation); *E.P. v. Alaska Psychiatric Institute*, 205 P.3d 1101, 1106-08 (Alaska 2009) (considering, under the public interest exception, appeal points about involuntary commitment of people with drug-induced brain damage); *In re Tracy C.*, 249 P.3d 1085, 1089-91 (Alaska 2011) (considering, under the public interest exception, appeal point about whether a patient must be gravely disabled at the time of the commitment hearing, as opposed to just at the time of hospital admission).

9 *See In re Joan K.*, 273 P.3d 594, 596 (Alaska 2012) ("Because Joan's post-release appeal from the superior court's commitment order is based on an assertion of insufficient evidence and neither Joan nor the State discussed mootness in their original briefs, we ordered supplemental briefing on that issue.").

10 *See* Oral argument in *In re Mark V. (Mark V. I)*, S-14534 at 27:21 (Aug. 1, 2013).

11 *See* 273 P.3d at 596.

firearm possession.[12] In the alternative, she argued that if the Court did not consider the merits of her appeal, it should vacate the underlying commitment order.[13]

At oral argument following the *Joan K.* supplemental briefing, the State clarified that it does not actually oppose the Court reaching the merits of civil commitment appeals, and that if the Court is concerned about collateral consequences, it should reach the merits of commitment appeals rather than vacating commitment orders.[14] In its *Joan K.* decision, the Court declined to revisit its mootness caselaw, instead supplementing it by adopting a collateral consequences exception in addition to the existing public interest exception.[15] The Court held that "there are sufficient general collateral consequences" from a civil commitment to justify reaching the merits of "an otherwise-moot appeal from a person's first involuntary commitment order" but that "some number of prior involuntary commitment orders would likely eliminate the possibility of additional collateral consequences, precluding the doctrine's application."[16]

Since *Joan K.*, the Court has declined to consider at least a portion of four commitment appeals due to mootness.[17] The Court has considered two appeals under the collateral consequences exception because they were appeals from the respondents' first

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12 *See id.*

13 *Id.*

14 Oral argument in *In re Joan K.*, S-13800 at 11:10:58 & 11:15:20 (Oct. 19, 2011).

15 273 P.3d at 597-98.

16 *Id.* at 598.

17 *See In re Gabriel C.*, 324 P.3d 835 (Alaska 2014); *In re Mark V. (Mark V. I)*, 324 P.3d 840 (Alaska 2014); *In re Dakota K.*, 354 P.3d 1068 (Alaska 2015); *In re Reid K.*, 357 P.3d 776 (Alaska 2015).

involuntary commitment orders.[18] And the Court has considered three appeals under the public interest exception based on the particular issues raised.[19]

In one post-*Joan K.* case, *In re Mark V.*, the State informed the Court that it was having difficulty litigating the collateral consequences exception.[20] The State again made clear that it does not actually oppose the Court reaching the merits of civil commitment appeals, and suggested that the Court consider doing so in order to provide more guidance to the trial courts.[21] When asked at oral argument whether it objected to the Court overruling *Wetherhorn*'s mootness holding, the State responded that it did not.[22]

But in deciding *Mark V.*, the Court again declined to revisit its mootness caselaw, holding that although a commitment order "can severely affect the civil rights of the committed individual" and although "there is certainly an institutional interest in ensuring that each involuntary civil commitment is justified," the Court was "not persuaded that these factors require full appellate review of every involuntary civil commitment order" and believed that "the existing recognized exceptions to the mootness doctrine adequately protect the interests of involuntary civil commitment respondents."[23]

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18 *See In re Jeffrey E.*, 281 P.3d 84 (Alaska 2012); *In re Stephen O.*, 314 P.3d 1185 (Alaska 2013).

19 *See In re Daniel G.*, 320 P.3d 262 (Alaska 2014); *In re Heather R.*, 366 P.3d 530 (Alaska 2016); *Matter of Mark V. (Mark V. II)*, 375 P.3d 51 (Alaska 2016); *Matter of Jacob S.*, 384 P.3d 758 (Alaska 2016).

20 Oral argument in *Mark V. I*, S-14534 at 22:37 (Aug. 1, 2013).

21 *See* 324 P.3d 840, 843 (Alaska 2014); Oral argument in *Mark V. I*, S-14534 at 24:57 & 26:40 (Aug. 1, 2013).

22 Oral argument in *Mark V. I*, S-14534 at 25:40 (Aug. 1, 2013).

23 324 P.3d at 847.

The State thus persists in raising mootness—as it feels it must after the Court ordered it to brief mootness in *Joan K.*—and attempting to faithfully apply the Court's mootness caselaw, as it has done in both of the cases at issue here, *N.B.* and *L.M.*

ARGUMENT

I. Was *Wetherhorn*'s mootness holding originally erroneous or is it no longer sound because of changed conditions, and, if so, will more harm than good result from overruling this holding?

Because *Wetherhorn*'s mootness holding creates practical problems with little or no apparent corresponding benefit, the State does not oppose the Court overruling it.

Under the stare decisis doctrine, the Court's "precedent is not lightly set aside."[24] Stare decisis "rests on a solid bedrock of practicality: 'no judicial system could do society's work if it eyed each issue afresh in every case that raised it.'"[25] But "stare decisis is a practical, flexible command that balances our community's competing interests in the stability of legal norms and the need to adapt those norms to society's changing demands."[26] The Court will overrule a decision "when convinced: (1) 'that the rule was originally erroneous or is no longer sound because of changed conditions,' and (2) 'that more good than harm would result from a departure from precedent.'"[27]

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24 *Guerrero ex rel. Guerrero v. Alaska Hous. Fin. Corp.*, 123 P.3d 966, 982 n.104 (Alaska 2005).

25 *Thomas v. Anchorage Equal Rights Comm'n*, 102 P.3d 937, 943 (Alaska 2004) (quoting *Planned Parenthood of Se. Pa. v. Casey*, 505 U.S. 833, 854 (1992)).

26 *Young v. State*, 374 P.3d 395, 413 (Alaska 2016) (quoting *State v. Carlin*, 249 P.3d 752, 757 (Alaska 2011)).

27 *State v. Carlin*, 249 P.3d 752, 757-58 (Alaska 2011) (quoting *Pratt & Whitney Canada, Inc. v. Sheehan*, 852 P.2d 1173, 1175-76 (Alaska 1993)).

Given the practical problems that have arisen in civil commitment appeals since *Wetherhorn*, its mootness holding can properly be characterized as "originally erroneous." A decision may be "originally erroneous" if it "proves to be unworkable in practice."[28] *Wetherhorn*'s mootness holding has shown itself to be unworkable in practice as parties have struggled in litigating over mootness in subsequent cases with no clear benefit to any party or to the Court. And for the same reasons, *Wetherhorn*'s mootness holding can properly be characterized as "no longer sound because of changed conditions," including that "facts have so changed or come to be seen so differently, as to have robbed the old rule of significant application."[29]

The Court has asked the parties to "address the time and effort spent litigating on appeal the application of the mootness doctrine and its various exceptions." And indeed, a large percentage of the State's time and effort litigating commitment appeals in recent years has been spent on mootness. In many—if not most—civil commitment appeals, applying the mootness doctrine and its exceptions is a more complicated and time-consuming project for an appellate attorney than actually addressing the merits. The merits of civil commitment cases are often straightforward—with the record providing clear support for the underlying commitment order—while the question of whether the appeal falls within a mootness exception may be complex and involve dissecting several theories advanced by the appellant. Moreover, to be appropriately cautious, the parties

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28 *Khan v. State*, 278 P.3d 893, 901 (Alaska 2012) (quoting *Thomas v. Anchorage Equal Rights Comm'n*, 102 P.3d 937, 943 (Alaska 2004)) (emphasis in original).

29 *Young*, 374 P.3d at 413 (quoting *Pratt & Whitney*, 852 P.2d at 1176).

must always brief the merits in addition to briefing mootness even when a case is likely to be moot, meaning that *Wetherhorn*'s mootness holding simply creates an additional layer of otherwise unnecessary work in every civil commitment appeal.

The addition of a collateral consequences exception to mootness in *Joan K.* has only complicated matters further. The collateral consequences exception can be particularly difficult to litigate because its applicability can hinge on facts that may not be in the appellate record, such as the number of times a person has been involuntarily committed before. The State will not necessarily have access to information about prior involuntary commitments, particularly if they occurred in other states, as the State pointed out in supplemental briefing in *Stephen O.* when the Court asked the parties to stipulate whether a respondent's prior commitment had been involuntary.[30] Other information outside the appellate record can also become relevant if an appellant argues that a particular commitment order has specific collateral consequences—for example, on the theory that the State might try to recoup the cost of the hospital stay. The appellate record will not contain hospital billing information or other information that could be relevant to such arguments. So *Wetherhorn*'s mootness holding, combined with *Joan K.*'s collateral consequences exception, can consume further resources by requiring appellate attorneys to search for information outside of the appellate record or seek a remand. This can transform an appeal that would be relatively straightforward on its merits into a complicated dispute over facts that are missing or incomplete.

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30 *See* Supplemental Brief of Appellee in *In re Stephen O.*, 314 P.3d 1185 (Alaska 2013).

Wetherhorn's mootness holding creates all of this extra work without providing any apparent corresponding benefit. Although the Court may have hoped that deeming civil commitment appeals moot would reduce the volume of such appeals, there is no indication that it has done so. This Court saw almost no commitment appeals before *Wetherhorn*, so the absolute numbers certainly do not suggest that *Wetherhorn*'s mootness holding discourages appeals. It is possible that overruling *Wetherhorn* could lead to an increase in appeals, but given that the Public Defender Agency has persisted in filing fact-dependent commitment appeals despite *Wetherhorn*'s mootness holding—and has said it intends to continue to challenge the applicability of the mootness doctrine—it seems likely that the volume of appeals would remain the same.

The Court suggested in *Reid K.* that the State could use *Wetherhorn* to save resources by securing dismissal of some appeals before briefing, but the State has not yet effectively been able to do this.[31] Institutional memory recalls that the State tried this approach before *Reid K.*, but the Court denied such motions without prejudice to raise mootness during the briefing, so the State discontinued this approach. The Court's past refusal to dismiss appeals before briefing makes some sense, because before an appellant's brief is filed, it may be difficult to determine if the issues raised would fall within the public interest exception. The State could perhaps rework its procedures and automatically file a pro forma motion to dismiss in every civil commitment case, forcing the appellant to fully advance his or her arguments for a mootness exception before the

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31 *See* 357 P.3d at 782.

briefing stage. If the Court declines to revisit *Wetherhorn*'s mootness holding, the State will attempt to do this, and perhaps more appeals will be resolved with slightly less work. But it appears that *Wetherhorn*'s mootness holding has yet to save any resources.

Finally, in addition to the above problems, *Wetherhorn*'s mootness holding results in less useful appellate decisions. A decision grappling with the finer points of mootness in this context—while perhaps legally interesting—does nothing to help the parties and the trial courts interpret and apply the legal standards for civil commitment.

Because *Wetherhorn*'s mootness holding creates practical problems without any apparent corresponding benefit, more good than harm would come from the Court revisiting *Wetherhorn*'s mootness holding and considering more appeals on the merits. Thus, as the State has indicated in prior cases, the State does not oppose such a step.

II. Does this court's mootness jurisprudence in involuntary commitment cases deprive the trial courts of significant precedent and guidance in their decision-making?

The Court can always apply the public interest exception to reach the merits of a civil commitment appeal when it believes doing so will provide significant guidance to the trial courts on an issue that is generalizable beyond the particular case at hand.

Nonetheless, as mentioned above, *Wetherhorn*'s mootness holding results in less useful appellate decisions. Many pages of the Court's civil commitment decisions are spent grappling with how to apply the mootness doctrine. But although mootness is an interesting issue for an appellate court, an appellate decision about mootness is of no use whatsoever to a trial court considering a civil commitment petition. By contrast, a fact-dependent appellate decision applying the civil commitment standards—while of limited

usefulness in a case based on different facts—may provide at least *some* guidance to a trial court trying to apply those same standards. Even an unpublished, per curiam decision on the merits of a commitment appeal would be more helpful to the trial courts' understanding of the legal standards than further development of the mootness doctrine.

And although a single fact-dependent appellate decision might not provide much guidance when read in isolation, a larger body of such decisions could help flesh out the civil commitment standards for the trial courts. The Court's decisions in child-in-need-of-aid cases are often very fact-dependent, but similar fact patterns reoccur, and a body of decisional law eventually develops to guide the parties and the trial courts.

In sum, more merits decisions in civil commitment appeals would provide more guidance to the trial courts than more appellate decisions about mootness.

III. Do the public interest or collateral consequences exceptions meaningfully protect a respondent's right to appellate review of involuntary commitment and involuntary medication orders?

A person appealing a mental health commitment order does not have an absolute "right to appellate review"; rather, like any litigant, she has a right to appellate review subject to normal court rules, procedures, and common-law legal doctrines like mootness.[32] If any prerequisites for appellate review are not met, an appeal may be dismissed, but such a rejection does not violate a "right to appellate review."[33]

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32 *See Mark V. I*, 324 P.3d at 847-48 (rejecting the argument that the statutory right to appeal a commitment order supersedes the mootness doctrine).

33 *Cf. Patterson v. Infinity Ins. Co.*, 303 P.3d 493, 499 (Alaska 2013) (rejecting the argument that summary judgment violates the right to a jury trial); *Capolicchio v. Levy*, 194 P.3d 373, 380 (Alaska 2008) (rejecting the argument that summary judgment violates the right to due process and trial by jury).

The State recognizes that a civil commitment respondent has very important liberty interests at stake at the trial court stage when a commitment petition is pending, but the importance of those interests does not translate into an absolute right to appellate review. Once a commitment or involuntary medication order has expired, the liberty interests that were at stake during the trial court proceedings are no longer at stake, which is why an appeal may be moot. Given that the respondent's liberty interests are no longer stake in a moot appeal, those liberty interests—despite their clear importance—do not require that the Court review the merits of a case in order to protect the respondent.

To the extent that any of the respondent's rights and liberty interests *are* still at stake in a moot appeal because an expired civil commitment or medication order entails collateral consequences, the collateral consequences exception will apply to permit review of the appeal. The collateral consequences exception therefore meaningfully protects the respondent's rights in the civil commitment appeal context. Given the practical problems discussed above, however, the collateral consequences exception may not be the optimal way of accomplishing this.

Unlike the collateral consequences exception, the public interest exception does not directly operate to help protect a respondent's rights. The public interest exception asks whether a respondent's appeal raises issues that are generalizable to other cases. The public interest exception is thus more about helping the trial courts in future cases than about helping protect the respondent in the case at hand.

CONCLUSION

For these reasons, the State does not oppose the Court reconsidering *Wetherhorn*'s mootness holding and reaching the merits of all civil commitment appeals.

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IN THE SUPREME COURT OF THE STATE OF ALASKA

In the Matter of the Necessity of the Hospitalization of L.M.	)	Supreme Court No.: S-16467

Trial Court Case #: 3AN-16-01656 PR

CERTIFICATE OF SERVICE AND TYPEFACE

I certify that on September 13, 2017 a true and correct copy of the **SUPPLEMENTAL BRIEF OF APPELLEE STATE OF ALASKA** and this **CERTIFICATE OF SERVICE** were served by U.S. Mail to the following:

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