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Attorneys for Plaintiff, Steve Hilton

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA (SOUTHERN DIVISION)

STEVE HILTON,

Plaintiff,

v.

SHIRLEY WEBER, in her official
capacity as California Secretary of
State, GOV. GAVIN NEWSOM in
his official capacity,

Defendants

And the LEGISLATURE OF
CALIFORNIA,

Real Parties in Interest

Case No.: 8:25-cv-01988-KK-E
Hon. Kenly Kiya Kato

**PLAINTIFF STEVE HILTON'S
NOTICE OF MOTION AND MOTION
FOR PRELIMINARY INJUNCTION**

[Memorandum Of Points And Authorities;
Declaration Of Chandra Sharma Proposed
Order Filed Consecutively]

Date: November 7, 2025
Time: 9:30 a.m.
Dept.: Courtroom 3, Third Fl.

[MOTION OPPOSED;
ORAL ARGUMENT REQUESTED]

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on November 7, 2025 at 9:30 a.m., or as soon
thereafter as the matter may be heard in Courtroom 3, third floor of the United States

1 District Court for the Central District of California, located at 3470 Twelfth Street,
2 Riverside, California, Plaintiff, Steve Hilton, will and hereby does move the Court,
3 pursuant to Fed. R. Civ. P. 65, for a Preliminary Injunction.

4 Mr. Hilton seeks to preserve the status quo in preventing imminent vote-
5 dilution which will inevitably arise from the erroneous congressional map placed
6 before voters by Proposition 50 on the November 4, 2025, California Statewide ballot.
7 The State may not proceed unless and until it demonstrates that the proposed districts
8 are as nearly equal in population as practicable, and that any deviation is supported by
9 a legitimate governmental objective. Accordingly, Mr. Hilton seeks the following
10 relief:

11 (1) an order directing the Secretary of State to suspend all activity in processing
12 the November 4, 2025 special election as to Proposition 50 and to postpone that
13 election as to Proposition 50 unless and until she can produce clear and convincing
14 evidence that the congressional maps incorporated into Proposition 50 are relatively
15 equal in population or, if unequal, that any discrepancy serves a legitimate
16 governmental purpose; or, in the alternative,

17 (2) if Proposition 50 passes on November 4, 2025, the court should enjoin
18 immediately the implementation of the new maps until the state can produce clear and
19 convincing evidence that these maps are relatively equal in population or if unequal,
20 that the discrepancy serves a legitimate governmental purpose.

21 This motion is based on the accompanying Memorandum of Points and
22 Authorities, the Declaration of Chandra Sharma, the pleadings and records on file, and
23 any argument the Court permits.

24 If and when the Court grants a preliminary injunction, Plaintiff is prepared to
25 give security in an amount satisfactory to this court in order to comply with Rule 65(c)
26 of the Federal Rules of Civil Procedure.

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DATED: October 3, 2025

JW HOWARD | ATTORNEYS, LTD.

By: /s/ John W. Howard

John W. Howard

Attorney for Plaintiff, Steve Hilton

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CERTIFICATE OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed by JW Howard/Attorneys, LTD. in the County of San Diego, State of California. My business address is 600 West Broadway, Suite 1400, San Diego, California 92101.

On October 3, 2025, I electronically filed the **PLAINTIFF STEVE HILTON'S NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION**

and served the documents using the Court's Electronic CM/ECF Service which will send electronic notification of such filing to all registered counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 3, 2025 at San Diego, California.

/s/ Dayna Dang
Dayna Dang, Paralegal
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