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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 **DAVID TANGIPA; et al.,**

14 Plaintiffs,

15 vs.

16 **GAVIN NEWSOM**, in his official
17 capacity as the Governor of California; *et al.*;

18 Defendants.

CASE NO. 2:25-cv-10616 JLS (KESx)

**JOINT STIPULATION FOR AN
ORDER SHORTENING TIME**

Assigned to Hon. Josephine L. Staton

Action Filed: November 5, 2025

JOINT STIPULATION

The Parties hereby stipulate and agree as follows:

WHEREAS, on November 4, 2025, a statewide special election was held to determine the passage of Proposition 50.

WHEREAS, upon the passage of Proposition 50, the State of California will have different congressional districts for the 2026 election.

WHEREAS, December 19, 2025, is the first day that individuals who will be candidates in each congressional district can begin to gather signatures to qualify as a candidate in lieu of paying a candidate filing fee and therefore must know the district boundaries for these new districts before that date.

WHEREAS, on November 5, 2025, Plaintiffs filed a Complaint for Declaratory and Injunctive Relief alleging Defendants violated the Fourteenth and Fifteenth Amendments.

WHEREAS, Plaintiffs' Complaint Requests a Three-Judge Court pursuant to 28 U.S.C. § 2284.

WHEREAS, Plaintiffs will be filing a Motion for Preliminary Injunction requesting the Three-Judge Court to enjoin from implementing, enforcing, or giving any effect to Proposition 50 and that the Three-Judge Court Order that the State use the Citizen Redistricting Commission's congressional maps that were used in 2022 and 2024 for the 2026 election during the pendency of this litigation.

WHEREAS, the Plaintiffs believe that the Three-Judge Court must enter a decision on Plaintiffs' Preliminary Injunction by November 26, 2025 so that the non-prevailing party has sufficient time to pursue their appellate remedies before December 19, 2025, the unofficial start of the 2026 congressional campaigns.

WHEREAS, Plaintiffs therefore believe that this Court should issue an order scheduling the hearing on the Motion for Preliminary Injunction on a date and time convenient to the Three-Judge Court between November 18, 2025 and November 24, 2025.

1 WHEREAS, although Defendants do not believe that preliminary
2 injunctive relief is necessary or appropriate here or that a decision is necessary in
3 the timeframe Plaintiffs request, they do not oppose Plaintiffs' request to set a
4 hearing on Plaintiffs' request for a preliminary injunction between November 18,
5 2025 and November 24, 2025.

6 WHEREAS, Defendants' non-opposition to scheduling the hearing on
7 Plaintiffs' motion for preliminary injunction should not be construed by the
8 parties or the Court as an agreement that this matter is appropriate for resolution
9 on a motion for interim relief rather than after a full evidentiary hearing after
10 sufficient time for the parties to develop the evidentiary record and brief these
11 important issues on the merits.

12 WHEREAS, the parties agree that Plaintiffs will file their Motion for a
13 Preliminary Injunction by close of business on November 7, 2025.

14 WHEREAS, the parties agree that Defendants will file their Opposition to
15 the Motion for Preliminary Injunction on or before November 14, 2025.

16 WHEREAS, the parties agree that Plaintiffs will file their Reply to the
17 Defendants Opposition on or before November 17, 2025.

18 WHEREAS, Plaintiffs request that the Three-Judge Court schedule a
19 hearing on Plaintiffs' Motion for Preliminary Injunction for a date after
20 November 18, 2025, that will enable the Three-Judge Court to issue a decision of
21 the Motion for Preliminary Injunction by November 26, 2025.

22 NOW THEREFORE, the Plaintiffs request that this Court issue an order
23 scheduling the hearing on the Motion for Preliminary Injunction on a date and
24 time convenient to the Three-Judge Court between November 18, 2025 and
25 November 24, 2025, and pursuant to stipulation, the parties request that the Court
26 set a briefing schedule under which Defendants' opposition to the Motion shall
27 be filed by 11:59 p.m. on November 14, 2025, and Plaintiffs' reply, if any, shall
28 be filed no later than 11:59 pm on November 17, 2025.

Respectfully submitted,

Dated: November 7, 2025

DHILLON LAW GROUP INC.

By: /s Mark P. Meuser

Mark P. Meuser

Attorney for Plaintiffs

Date: November 7, 2025

CALIFORNIA DEPARTMENT OF JUSTICE

By: /s Jennifer Rosenberg

Jennifer Rosenberg

Attorney for Defendants

Attestation:

All signatories listed have concurred with the stipulation's content and have authorized the filing.

Dated: November 7, 2025

DHILLON LAW GROUP INC.

By: /s Mark P. Meuser

Mark P. Meuser

Attorney for Plaintiffs