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Attorneys for Plaintiff-Intervenor

UNITED STATES OF AMERICA

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

DAVID TANGIPA, *et al.*,
Plaintiffs,

and

UNITED STATES OF AMERICA,
Plaintiff-Intervenor,

v.

GAVIN NEWSOM, in his official
capacity as the Governor of California,
et al.,
Defendants,

Case No. 2:25-cv-10616-JLS-KES
Three-Judge Court

**UNITED STATES' NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY INJUNCTION**

Honorable Josephine L. Staton
United States District Judge

Hearing Date: December 5, 2025
Time: 10:30 am
Courtroom: 8A

* Assistant Attorney General Harmeet K. Dhillon is recused from this matter.

NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE THAT at 10:30 a.m. on the 5th day of December, 2025, Plaintiff-Intervenor, the United States of America, will move and hereby moves this Court to issue a preliminary injunction against Defendants Gavin Newsom, in his official capacity as the Governor of California, and Shirley Weber, in her official capacity as the Secretary of State of California, that preliminarily enjoins Defendants from implementing Proposition 50's congressional-district map and requires Defendants to use the 2021 map (used in the 2022 and 2024 congressional elections) for the 2026 congressional election.

This Motion is brought pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65-1 on the grounds that the entry of a preliminary injunction is appropriate because the United States has established (1) a likelihood of prevailing on the merits of its claims; (2) that it is likely to suffer irreparable harm in the absence of injunctive relief; (3) that the balance of equities favor injunctive relief; and (4) that the preliminary injunction is in the public interest.

This Motion is based on the attached Memorandum of Points and Authorities, the Declaration of Julie A. Hamill (attached to the United States' Complaint) and exhibits attached thereto, the related pleadings in this case, and any other matters as may be presented to the Court at or before the hearing.

Under Local Rule 7-3, a conference of counsel is not needed because the United States is seeking a preliminary injunction.

1 DATED: November 13, 2025

Respectfully submitted:

2 BILAL A. ESSAYLI
3 First Assistant United States Attorney
4 *s/ Julie A. Hamill*

5 JULIE A. HAMILL
6 Assistant United States Attorney
7 United States Attorney's Office

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s/ Matthew Zandi

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