

JESUS A. OSETE*
Principal Deputy Assistant Attorney General
MATTHEW ZANDI (CA No. 203329)
Chief of Staff & Special Counsel
MAUREEN RIORDAN (NY No. 2058840)
Acting Chief, Voting Section
ANDREW BRANIFF (IN No. 23430-71)
Acting Chief, Appellate Section
DAVID GOLDMAN (VA No. 98922)
JOSHUA R. ZUCKERMAN (DC No. 1724555)
GRETA GIESEKE (TX No. 24132925)

Attorneys
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530
Telephone: (202) 514-3847
E-Mail: matt.zandi@usdoj.gov

BILAL A. ESSAYLI
First Assistant United States Attorney
JULIE A. HAMILL (CA No. 272742)
Assistant United States Attorney
United States Attorney's Office
300 North Los Angeles Street, Suite 7516
Los Angeles, California 90012
Telephone: (213) 894-2464
E-Mail: julie.hamill@usdoj.gov

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 UNOPPOSED
MOTION TO INTERVENE**

Honorable Josephine L. Staton
United States District Judge

Hearing Date: November 21, 2025
Time: 10:30 a.m.
Courtroom: 8A

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

NOTICE OF MOTION AND UNOPPOSED MOTION TO INTERVENE

PLEASE TAKE NOTICE THAT at 10:30 a.m. on the 21st day of November, 2025, the United States of America, will move and hereby moves this Court to intervene as Plaintiff-Intervenor in this case as of right under Federal Rule of Civil Procedure 24(a)(1). Alternatively, the United States of America will move and hereby moves this Court to grant permissive intervention under Federal Rule of Civil Procedure 24(b).

This Motion is based on the attached Memorandum of Points and Authorities, the attached Certificate of Attorney General certifying that this is a case of general public importance, the related pleadings in this case, and any other matters as may be presented to the Court at or before the hearing.

Counsel for the United States conferred with Counsel for Plaintiffs and Counsel for Defendants Gavin Newsom and Shirley Weber on November 12, 2025 and November 13, 2025. Counsel for Plaintiffs stated that Plaintiffs do not oppose this Motion. Counsel for Defendants stated that Defendants take no position on this Motion. Also on November 12, 2025, this Court granted Intervenor-Defendant Democratic Congressional Campaign Committee (DCCC)'s Motion to Intervene. Dkt. 26. Counsel for the United States contacted Counsel for DCCC on November 13, 2025 for its position on this Motion but as of the time of this filing has not received a response.

Plaintiffs filed this suit just last week, the United States' federal interest did not become apparent until days after the suit, and the relief sought by Plaintiffs and the United States is time sensitive. The United States therefore respectfully submits that compliance with L.R. 7-3's requirement that the conference take place at least 7 days before a motion is filed was impracticable.

Because the Motion is not opposed, the United States respectfully submits that no hearing on the motion is necessary and requests that the Court grant the motion

without any hearing. Alternatively, given the time-sensitive nature of this election-law case, the United States respectfully requests that the Court set a hearing for this Motion (if necessary) as soon as practicable and no later than November 21, 2025.

DATED: November 13, 2025

Respectfully submitted:

BILAL A. ESSAYLI
First Assistant United States Attorney
s/ Julie A. Hamill
JULIE A. HAMILL
Assistant United States Attorney
United States Attorney's Office

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