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DEMOCRACY DEFENDERS ACTION

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Counsel for Proposed Intervenor-Defendant

League of United Latin American Citizens

**Application for admission pro hac vice forthcoming*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DAVID TANGIPA, *et al.*,
Plaintiffs,

v.

GAVIN NEWSOM, *et al.*,
Defendants,
and
LEAGUE OF UNITED LATIN
AMERICAN CITIZENS (LULAC),
Intervenor-Defendant.

Case No. 2:25-cv-10616-JLS-WLH-KKL

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
DEFENDANT-INTERVENOR
LEAGUE OF UNITED LATIN
AMERICAN CITIZENS' EX
PARTE MOTION TO EXPEDITE**

Hon. Josephine L. Staton
Hon. Wesley L. Hsu
Hon. Kenneth K. Lee

Hearing Date: Not applicable
Time: Not applicable
Courtroom: Not applicable

1 Applicant League of United Latin American Citizens’ (“LULAC”) Rule 24
2 Motion to Intervene (Dkt. 39) is noticed for December 3, 2025, the scheduled start of
3 the preliminary injunction hearing. For purposes of efficiency and to enable LULAC
4 to participate in the preliminary injunction hearing, pursuant to Local Rule 7-19 and
5 Judge Staton’s Procedures ¶ 3, Applicant requests that consideration of its Rule 24
6 Motion to Intervene (Dkt. 39) be expedited to be decided before November 21, 2025,
7 and the applicable briefing deadlines be shortened to allow the Motion to be resolved
8 before such a time. In particular, Applicant requests that any party that opposes the
9 Rule 24 Motion be given until November 19, 2025 to file an opposition.

10 In support of this Application, LULAC states as follows:

11 1. LULAC will be severely prejudiced if its Rule 24 motion is not decided by
12 November 21, 2025. Without a decision by that date, LULAC will not be able to
13 comply with the Court’s November 14 Order (Dkt. 38) and file its opposition to the
14 motions for preliminary injunction (Dkt. 16 & 29) by November 21, 2025. If LULAC
15 is not able to file an opposition to the motions for preliminary injunction by that date,
16 the Court may preclude it from participating in the preliminary injunction hearing
17 starting December 3, 2025.

18 2. Conversely, there are significant efficiencies for both the Court and the
19 Parties in deciding LULAC’s Rule 24 Motion before November 21, 2025. Providing
20 a decision before November 21 would enable LULAC to file an opposition to the
21 motions for preliminary injunctions (Dkt. 16 & 29) on the same date as Defendants and
22 the Defendant-Intervenor, in accordance with the Court’s November 14 Order (Dkt.
23 38). This would also ensure that Plaintiffs and the Plaintiff-Intervenor have LULAC’s
24 brief at the same time as the other parties opposing the preliminary injunction – three
25 days before their reply is due on November 24, 2025.

3. Expediting consideration of the Rule 24 motion is also important to settling whether LULAC and any witnesses it may want to present will be allowed to participate in the preliminary injunction hearing well in advance of the December 3, 2025 date.

4. LULAC is not seeking *ex parte* relief due to a lack of diligence. This case was filed only eleven days ago, and Plaintiffs' Motion for Preliminary Injunction was filed only nine days ago. Due to agreement of the Parties, the preliminary injunction briefing and hearing have been set on an expedited track, such that a standard briefing schedule would not resolve LULAC's motion in time to participate. Moreover, as discussed in the Rule 24 Motion, Applicant sought to intervene just two days after the United States moved to intervene on Plaintiffs' behalf, making clear for the first time in this litigation that the United States would not be advocating for the interests of Latino voters, as it has often done in the past. LULAC filed its Rule 24 motion one day after the motion of the United States was granted (Dkt. 38).

5. LULAC attempted to resolve this issue before filing this motion, and on November 14 and 15 contacted counsel for Plaintiffs, Defendants, Intervenor-Plaintiff United States, and Intervenor-Defendant DCCC for their position on the Rule 24 motion and this *ex parte* motion. Only one of the four parties, Plaintiffs, has indicated that they oppose this Motion and the Rule 24 Motion to Intervene.

a. Counsel for Plaintiffs (Mark Meuser, Michael Columbo, and Shawn Cowles, all with the Dhillon Law Group) stated that Plaintiffs oppose expedition and the Rule 24 motion.

b. Counsel for Defendants (David Green, Iram Hasan, Jennifer Rosenberg, Ryan Eason, and Clint Woods, all with the California Attorney General’s Office) stated that Defendants do not oppose expedition or the Rule 24 motion.

1 c. Counsel for Intervenor-Plaintiff United States (Julie A. Hamill and Matt
2 Zandi, both of the U.S. Department of Justice) stated that Intervenor-Plaintiff United
3 States takes no position on expedition or the Rule 24 motion.

4 d. Counsel for Intervenor-Defendant DCCC (Abha Khanna, Lali Madduri, Chris
5 Dodge, and Max Accardi, all with the Elias Law Group) stated that Intervenor-
6 Defendant DCCC takes no position on expedition or the Rule 24 motion.

7 6. As noted above, LULAC requests that any party that opposes the Rule 24
8 Motion be given until November 19, 2025 to file an opposition.

9 7. LULAC is willing to abide by any schedule set by the Court. To that end, if
10 the Court will decide LULAC's Rule 24 Motion before November 21, 2025, LULAC
11 is willing to waive its reply brief for that Motion. If LULAC's Motion stays on the
12 calendar for December 3, 2025, Applicant believes the remaining schedule should be
13 set in accordance with Local Rules 7-9 and 7-10.

14 8. There is no prejudice to having LULAC's Motion decided before November
15 21, 2025. Among other things, the only party who opposes LULAC's Motion –
16 Plaintiffs – have requested expedition for all other aspects of this proceeding. Plaintiffs
17 have also not opposed the two other Rule 24 motions to intervene and are presumably
18 well-versed with the relevant legal principles and law. And for the reasons described
19 in the Application, LULAC's participation in the case will not delay proceedings.

DATED: November 16, 2025

/s/ Sean O. Morris

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*Counsel for Proposed Intervenor-
Defendant*

League of United Latin American Citizens

**Application for admission pro hac vice
forthcoming*

Respectfully submitted,

**DEMOCRACY DEFENDERS
ACTION**

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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF DEFENDANT-INTERVENOR LEAGUI OF
UNITED LATIN AMERICAN CITIZENS' EX PARTE MOTION TO EXPEDITE

ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4

This certifies, pursuant to Local Rule 5-4.3.4, that all signatories to this document concur in its content and have authorized this filing.

/s/ John Freedman

John Freedman

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CERTIFICATE OF SERVICE

Case Name: **Tangipa et al v. Newsom et al** No. **2:25-cv-10616**

I hereby certify that on November 16, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
DEFENDANT-INTERVENOR LEAGUE OF UNITED LATIN AMERICAN
CITIZENS' EX PARTE MOTION TO EXPEDITE**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on November 16, 2025, at Washington, D.C.

/s/ John A. Freedman

Signature