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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

**NOTICE OF MOTION AND
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

NOTICE OF MOTION AND MOTION TO EXPEDITE

The League of United Latin American Citizens (“LULAC”) respectfully requests that consideration of its Rule 24 Motion to Intervene (Dkt. 39) be expedited to be decided before November 21, 2025, and the applicable briefing deadlines be shortened to allow the Motion to be resolved before such a time. In particular, Applicant requests that any party that opposes the Rule 24 Motion be given until November 19, 2025 to file an opposition.

In support of its Motion, LULAC submits and incorporates the attached Memorandum of Points and Authorities.

Pursuant to Local Rule 7-3, counsel for LULAC conferred with counsel for the existing parties on November 15, 2025. Counsel for Plaintiff opposes this motion. Counsel for Defendants do not oppose this motion. Counsel for Intervenors DCCC and the United States take no position on this motion.

1 DATED: November 16, 2025

2 /s/ Sean O. Morris

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25 *Counsel for Proposed Intervenor-*
26 *Defendant*

27 *League of United Latin American Citizens*

28 **Application for admission pro hac vice*
forthcoming

Respectfully submitted,

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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:

NOTICE OF MOTION AND DEFENDANT-INTERVENOR LEAGUE OF UNITED LATIN AMERICAN CITIZENS' RULE 24 MOTION TO INTERVENE

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 15, 2025, at Washington, D.C.

/s/ John A. Freedman

Signature