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20 *Pro Hac Vice application forthcoming

21 Counsel for Cervantes Intervenor-Defendants
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DAVID TANGIPA; ERIC CHING;
SAUL AYON; PETER HERNANDEZ;
ROXANNE HOGE; JOEL GUITERREZ
CAMPOS; SOLOMON VERDUZCO;
PAUL RAMIREZ; JANE ORTIZ-
WILSON; VERNON COSTA; RACHEL
GUNTHER; DOUG BUCHANAN;
SAYRS MORRIS; MIKE NETTER;
CHRISTINA RAUGHTON; KRISTI
HAYS; JAMES REID; MICHAEL
TARDIF; ALEX GALICIA; AND
CALIFORNIA REPUBLICAN PARTY,

Plaintiff,

vs.

GAVIN NEWSOM, IN HIS OFFICIAL
CAPACITY AS THE GOVERNOR OF
CALIFORNIA; SHIRLEY WEBER, IN
HER OFFICIAL CAPACITY AS
CALIFORNIA SECRETARY OF
STATE,

Defendant

Case No.: 2:25-cv-10616

NOTICE OF OPPOSED MOTION TO
INTERVENE AS DEFENDANT;

NOTICE OF MOTION AND OPPOSED MOTION TO INTERVENE

Pursuant to Federal Rule of Civil Procedure 24(a)(2), Clarissa Cervantes,
Antonio Madrigal, Jose Antonio Moreno Jr., Dr. Ines Ruiz- Huston, Dr. Gary Segura,
and Isabel Solis. (Proposed Cervantes Intervenor-Defendants) respectfully request
that this Court grant it leave to intervene of right as a defendant in this case. In the
alternative, Proposed Cervantes Intervenor-Defendants respectfully requests this

1 Court grant it leave to intervene under the permissive intervention standard of
2 Federal Rule of Civil Procedure 24(b). Proposed Cervantes Intervenor-Defendants
3 submit and incorporate the attached Memorandum of Points and Authorities in
4 support of its motion. Proposed Cervantes Intervenor-Defendants also submit
5 declarations for each individual intervenor (Exhibit A), a proposed Answer (Exhibit
6 B) and proposed Order (Exhibit C).
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9 Counsel conferred with counsel for the existing parties on November 17, 2025.
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11 Counsel for the Tangipa Plaintiffs stated they would file an opposition to this
12 motion to intervene but would not be filing an opposition to application for expedited
13 consideration.
14

15 Counsel for the United States stated, “If you will abide by the stipulated
16 briefing schedule and hearing date set forth in the court’s order issued on November
17 14, then the United States takes no position.” (Proposed Cervantes Intervenor-
18 Defendants will of course abide by the Court ordered schedule. That said, they
19 contend that the hearing timeline advocated for by Plaintiffs is unusually expedited
20 given the fact-specific nature of their racial gerrymandering claim. Accordingly,
21 Proposed Cervantes Intervenor-Defendants argue that the Court should take
22 evidence to resolve the fact issues presented in the Motions for Preliminary
23 Injunction and, in order for the parties to submit a record most beneficial to the Court,
24 Proposed Cervantes Intervenor-Defendants advocate for a reasonable extension on
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1 the hearing date to allow for a reasonable disclosure period. Nevertheless, should
2 the Court maintain the schedule it ordered, the Proposed Cervantes Intervenor-
3 Defendants will abide.)
4

5 The LULAC and DCCC Intervenor-Defendants take no position on this
6 intervention.
7

8 The Proposed Cervantes Intervenor-Defendants request that the Court grant
9 the motion without a hearing. The Cervantes Intervenor-Defendants will separately file their
10 memorandum of points and authorities in support of their motion.
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15 Dated November 17, 2025
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18
19 /s/Sonni Waknin

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Counsel for Cervantes Intervenor-
Defendants

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7 **ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4**

8 This certifies, pursuant to Local Rule 5-4.3.4, that all signatories to this
9 document concur in its content and have authorized this filing.
10

11 /s/Sonni Waknin
12 Sonni Waknin
13

14 **CERTIFICATE OF SERVICE**
15

16 I certify that the foregoing was served on all counsel of record on November 17,
17 2025, via the Court's CM/ECF system.
18

19 /s/ Sonni Waknin
20 Sonni Waknin
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