

1 MICHAEL A. COLUMBO (SBN: 271283)
mcolumbo@dhillonlaw.com

2 SHAWN COWLES (SBN: 163826)
3 scowles@dhillonlaw.com

4 MARK P. MEUSER (SBN: 231335)
mmeuser@dhillonlaw.com

5 DOMENIC P. AULISI (Admitted PHV)
6 daulisi@dhillonlaw.com

7 AMBER R. HULSE (Admitted PHV)
ahulse@dhillonlaw.com

8 **DHILLON LAW GROUP INC.**
4675 MacArthur Court, Suite 1410
9 Newport Beach, CA 92660
10 Telephone: (415) 433-1700
11 Fax: (415) 520-6593

12 *Attorneys for Plaintiffs*

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 **DAVID TANGIPA; et al.,**
17 Plaintiffs,
18
19 vs.
20 **GAVIN NEWSOM, in his official**
capacity as the Governor of California; *et*
21 *al.*;
22 Defendants.

CASE NO. 2:25-cv-10616-JLS-WLH-
KKL

**NOTICE OF JOINDER IN
PLAINTIFF-INTERVENOR
UNITED STATES'S
RENEWED MOTION FOR
ADVERSE INFERENCE**

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

Action Filed: November 5, 2025
Hearing: December 3, 2025

1 Plaintiffs hereby give notice of their joinder in Plaintiff-Intervenor United States's
2 Renewed Motion for Adverse Inference (Dkt. No. 162). As a result of Paul Mitchell's
3 meritless and selective assertions of legislative privilege, as well as Mr. Mitchell's and
4 Defendant-Intervenor DCCC's failure to timely comply with document requests for
5 records within their possession, custody, or control, Plaintiffs have been deprived of
6 evidence of Mr. Mitchell's use of race when drawing the Proposition 50 maps and the
7 ability to effectively confront Mr. Mitchell over his statements indicating that race was
8 the predominant factor in the challenged districts. Accordingly, an adverse inference is
9 warranted at this stage of the litigation.

10 Date: December 15, 2025

By: /s/ Mark P. Meuser
MICHAEL A. COLUMBO (SBN: 271283)
mcolumbo@dhillonlaw.com
DHILLON LAW GROUP INC.
177 Post Street, Suite 700
San Francisco, California 94108
Telephone: (415) 944-4996

SHAWN COWLES (SBN: 163826)
scowles@dhillonlaw.com
MARK P. MEUSER (SBN: 231335)
mmeuser@dhillonlaw.com
DHILLON LAW GROUP INC.
4675 MacArthur Court, Suite 1410
Newport Beach, CA 92660

DOMENIC P. AULISI (Admitted PHV)
daulisi@dhillonlaw.com
AMBER R. HULSE (Admitted PHV)
ahulse@dhillonlaw.com
DHILLON LAW GROUP INC.
2121 Eisenhower Avenue, Suite 608
Alexandria, VA 22314

Attorneys for Plaintiffs

