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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION
14

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16 **DAVID TANGIPA, et al.,**
17 Plaintiffs,
18 and
19 **UNITED STATES OF AMERICA,**
20 Plaintiff-Intervenor
21 v.
22 **GAVIN NEWSOM, in his official**
23 **capacity as the Governor of California,**
24 **et al.,** Defendants,
25 and
26 **DEMOCRATIC CONGRESSIONAL**
27 **CAMPAIGN COMMITTEE, et al.,**
28 Defendant-Intervenors.

2:25-cv-10616-JLS-WLH-KKL
Three-Judge Court

**DEFENDANTS' REQUEST FOR
JUDICIAL NOTICE IN
SUPPORT OF MOTION TO
DISMISS PLAINTIFFS' AND
PLAINTIFF-INTERVENOR'S
COMPLAINTS**

Date: April 10, 2026
Time: 10:30 a.m.
Courtroom: 1
Judges: Hon. Josephine L.
Staton, Hon. Kenneth
K. Lee, and Hon.
Wesley L. Hsu
Trial Date: None Designated
Action Filed: Nov. 5, 2025

1 Pursuant to Rule 201 of the Federal Rules of Evidence, Defendants California
2 Governor Gavin Newsom and California Secretary of State Shirley Weber
3 respectfully request that the Court take judicial notice of the documents listed
4 below and attached hereto. This Request is made in connection with Defendants’
5 Motion to Dismiss Plaintiffs’ and Plaintiff-Intervenor’s Complaints.

6 **Exhibit 1:** Assemb. Const. Amend. 8, 2025-26 Reg. Sess. (Cal. 2025),
7 available at <https://tinyurl.com/mrxuk49v> (last visited Feb. 11, 2026). The Court
8 may take judicial notice of matters of public record, including government
9 documents, press releases, and legislative materials. *DeHoog v. Anheuser-Busch*
10 *InBev SA/NV*, 899 F.3d 758, 762 n.5 (9th Cir. 2018). As a legislatively referred
11 constitutional amendment, Exhibit 1 is properly subject to judicial notice.

12 **Exhibit 2:** Cal. Sec’y. of St., *Official Voter Information Guide*, available at
13 <https://tinyurl.com/3u6r7p4r> (last visited Jan. 28, 2026). The Court may take
14 judicial notice of matters of public record, including government documents, press
15 releases, and legislative materials. *See DeHoog*, 899 F.3d at 762 n.5. As a
16 government document prepared by the Secretary of State that is a matter of public
17 record, Exhibit 2 is properly subject to judicial notice.

18 **Exhibit 3:** Proposition 50 Ballot Label (Aug. 27, 2025). The Court may take
19 judicial notice of matters of public record, including government documents, press
20 releases, and legislative materials. *DeHoog*, 899 F.3d at 762 n.5. As a government
21 document prepared by the Secretary of State that is a matter of public record,
22 Exhibit 3 is properly subject to judicial notice.

23 **Exhibit 4:** Cal. Sec’y of St., *Statement of Vote—November 4, 2025 Statewide*
24 *Special Election* (Dec. 12, 2025), available at <https://tinyurl.com/3dbsywvu>. The
25 Court may take judicial notice of matters of public record, including government
26 documents, press releases, and legislative materials. *DeHoog*, 899 F.3d at 762 n.5.
27 As a government document prepared by the Secretary of State that is a matter of
28 public record, Exhibit 4 is properly subject to judicial notice.

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Dated: February 11, 2026

Respectfully submitted,

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