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** Pro hac vice application forthcoming (in the Noyes matter) and granted (in the Tangipa matter)*

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 DAVID TANGIPA, *et al.*,

4 Plaintiffs,

5
6 v.

7
8 GAVIN NEWSOM, in his official
9 capacity as the Governor of California,
10 *et al.*,

11 Defendants.

12
13 MITCH NOYES, *et al.*,

14 Plaintiffs,

15
16 v.

17 GAVIN NEWSOM, in his official
18 capacity as the Governor of California,
19 *et al.*,

20 Defendants.

Case Nos:

2:25-cv-10616-JLS-WLH-KKL

2:25-cv-11480-JLS-WLH-KKL

**DCCC'S RESPONSE TO THE
COURT'S ORDER TO SHOW
CAUSE RE: CONSOLIDATION**

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1 Comes now Intervenor-Defendant (in *Tangipa et al. v. Newsom et al.*, Case No.
2 25-10616) and Proposed Intervenor-Defendant (in *Noyes et al. v. Newsom et al.*, Case
3 No. 25-11480) the Democratic Congressional Campaign Committee (“DCCC”) to offer
4 its response to the Court’s Order to Show Cause, *Noyes*, ECF No. 52, directing the parties
5 to show cause why the *Tangipa* and *Noyes* cases should not be consolidated for all future
6 proceedings.

7 DCCC does not object to the consolidation of the *Tangipa* and *Noyes* cases so long
8 as its motion to intervene in the *Noyes* case is granted, and it is allowed to participate as
9 an Intervenor-Defendant in both consolidated matters. The Court has already granted
10 DCCC’s motion to intervene in the *Tangipa* case, and DCCC has filed a fully briefed
11 motion to intervene in the *Noyes* case; DCCC’s briefing on the motions to intervene
12 explains its interests in these cases and why it should be permitted to intervene as of right,
13 or in the alternative, on a permissive basis. Accordingly, DCCC is entitled to intervene
14 in both cases.

15 DCCC notes that this Court stayed the entire *Noyes* matter until the time for appeal
16 of the Court’s order on the *Tangipa* preliminary injunction motions has expired or the
17 Supreme Court decides any appeal of this Court’s order in *Tangipa. Noyes*, ECF No. 44.
18 As the Supreme Court has not yet resolved the *Tangipa* Plaintiffs’ preliminary injunction
19 appeal, the *Noyes* stay remains in place.

20 DCCC proposes that the Court consolidate the *Tangipa* and *Noyes* matters for all
21 future proceedings. DCCC further proposes staying both the *Tangipa* and *Noyes* matters
22 until either the Supreme Court resolves the *Tangipa* Plaintiffs’ appeal, or the time for
23 Plaintiffs to file a statement of probable jurisdiction in the *Tangipa* appeal expires.
24 However, DCCC does not oppose State Defendants’ suggestion of lifting the stay for the
25 limited purpose of litigating State Defendants’ and any Intervenor-Defendants’ motions
26 to dismiss the *Noyes* complaint.

1 Dated: February 27, 2026

Respectfully submitted,

2 /s/ Lalitha D. Madduri

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