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**DEMOCRACY DEFENDERS ACTION**

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**JUSTICE LEGAL STRATEGIES PLLC**

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1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3 WESTERN DIVISION  
4

5 DAVID TANGIPA, *et al.*,  
6 Plaintiffs,

7 v.

8 GAVIN NEWSOM, *et al.*,  
9 Defendants,  
10

11 and

12 LEAGUE OF UNITED LATIN  
13 AMERICAN CITIZENS (LULAC),  
14 Intervenor-Defendant.

Case No. 2:25-cv-10616-JLS-WLH-  
KKL

**INTERVENOR-DEFENDANT  
LULAC'S RESPONSE TO ORDER  
TO SHOW CAUSE RE:  
CONSOLIDATION (ECF No. 230)**

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

Hearing Date:  
Time: 10:30 a.m.  
Courtroom: 1

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1 Intervenor-Defendant LULAC hereby submits the following response to the  
2 Court's Order to Show Cause (ECF No. 230).

3 1. LULAC does not object to the consolidation of the *Tangipa* and *Noyes*  
4 cases.

5 2. LULAC notes that the Court stayed the entire *Noyes* matter until the  
6 time for appeal of the Court's order on the *Tangipa* preliminary injunction motions  
7 has expired or the Supreme Court decides any appeal of this Court's order in  
8 *Tangipa. Noyes*, ECF No. 44. As the Supreme Court has not yet resolved the *Tangipa*  
9 Plaintiffs' preliminary injunction appeal, the *Noyes* stay remains in place.

10 3. LULAC believes the *Noyes* stay should remain in place pursuant to the  
11 Court's Order.

12 4. Once the stay is lifted in the *Noyes* matter, LULAC intends to file a  
13 motion to intervene in the *Noyes* matter.  
14

15 Dated: February 27, 2026

16 /s/ John A. Freedman

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**CERTIFICATE OF SERVICE**

1  
2 The undersigned hereby certifies that all counsel of record who are deemed to have  
3 consented to electronic service are being served the foregoing **INTERVENOR-DEFENDANT**  
4 **LULAC RESPONSE TO THE ORDER TO SHOW CAUSE RE: CONSOLIDATION** via  
5 the Court’s CM/ECF system on February 27, 2026.

6  
7 /s/ John A. Freedman  
8 John A. Freedman  
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