

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

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

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

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

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

11 *Attorneys for Plaintiffs*

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 **DAVID TANGIPA, et al.,**

15 Plaintiffs,

16 vs.

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

20 Defendants.

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

**PLAINTIFFS' RESPONSE**  
**TO ORDER TO SHOW**  
**CAUSE RE:**  
**CONSOLIDATION**

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

Action Filed: November 5, 2025



1 Plaintiffs David Tangipa, Eric Ching, Saul Ayon, Peter Hernandez, Roxanne  
2 Hoge, Joel Guterrez Campos, Solomon Verduzco, Paul Ramirez, Jane Ortiz-Wilson,  
3 Vernon Costa, Rachel Gunther, Doug Buchanan, Sayrs Morris, Mike Netter, Christina  
4 Raughton, Kristi Hays, James Reid, Michael Tardif, Alex Galicia, and the California  
5 Republican Party (collectively, “Plaintiffs”), respectfully submit this response to the  
6 Court’s Order to Show Cause Re: Consolidation (Dkt. No. 230).

7 Plaintiffs do not oppose the consolidation of this matter and *Noyes v. Newsom*, No.  
8 2:25-cv-11480-JLS-WLH-KKL (C.D. Cal.), for all future proceedings. Federal Rule of  
9 Civil Procedure 42(a) provides that “[i]f actions before the court involve a common  
10 question of law or fact, the court may . . . consolidate the actions.” “To determine whether  
11 to consolidate, a court weighs the interest of judicial convenience against the potential  
12 for delay, confusion and prejudice caused by consolidation.” *Knox v Yingli Green Energy*  
13  *Holding Co. Ltd.*, 136 F. Supp. 3d 1159, 1162 (C.D. Cal. 2015).

14 Both this case and *Noyes* challenge the constitutionality and legality of  
15 California’s congressional districts under the map authorized through Proposition 50.  
16 Both cases are pending before the same three-judge court. And, as the *Noyes* plaintiffs  
17 recognized in their Notice of Related Case (*Noyes*, Dkt. No. 6 at 1), the two actions “arise  
18 from the same . . . happening or event” and “call for determination of the same or  
19 substantially related . . . questions of law and fact.”

20 Consolidation will promote judicial economy by allowing the court to resolve the  
21 overlapping legal and factual questions in a single, coordinated proceeding. Moreover,  
22 consolidation will not cause delay, confusion, or prejudice to any party. On the contrary,  
23 consolidation would avoid the risk of confusion arising from parallel litigation over  
24 similar constitutional and statutory challenges to the same congressional map, which  
25 could result in multiple or inconsistent rulings from the Court.

26 For these reasons, Plaintiffs respectfully submit that consolidation of this case and  
27 *Noyes v. Newsom* for all future proceedings is appropriate and warranted.

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Date: February 27, 2026

By: /s/ Michael A. Columbo  
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  
**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*

RETRIEVED FROM DEMOCRACYDOCKET.COM

