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

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

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

**JOINT STIPULATION TO  
EXTEND TIME FOR DEFENSE  
PARTIES TO RESPOND TO  
CONSOLIDATED COMPLAINT  
AND TO SET DEADLINES FOR  
PLAINTIFF PARTIES TO  
RESPOND TO MOTIONS TO  
DISMISS**

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 The Parties hereby stipulate and agree as follows:

2 WHEREAS on March 17, 2026, the Court issued an order directing that  
3 Plaintiffs and Plaintiff-Intervenor (“Plaintiff Parties”) file a single, consolidated  
4 complaint (ECF No. 238);

5 WHEREAS on March 27, 2026, Plaintiff Parties filed the Consolidated  
6 Complaint (ECF No. 240);

7 WHEREAS the Court’s order did not set a deadline for Defendants and  
8 Defendant-Intervenors (“Defense Parties”) to respond to the Consolidated  
9 Complaint;

10 WHEREAS on Thursday, April 2, Friday, April 3, and Monday, April 6, 2026,  
11 counsel for Defendants Weber and Newsom (“State Defendants”) emailed counsel  
12 for Plaintiff Parties to discuss whether they would be willing to join a joint  
13 stipulation that would (1) extend all Defense Parties’ deadlines to move to dismiss  
14 the Consolidated Complaint by seven additional days, setting the Defense Parties’  
15 new response deadline as April 24, 2026, and providing for a total of 28 days to file  
16 their motions after the filing of the Consolidated Complaint, and (2) provide that  
17 Plaintiff Parties likewise have 28 days from the filing of the motions to dismiss to  
18 file any opposition briefs;<sup>1</sup>

19 WHEREAS Defense Parties believe that the seven days of additional time  
20 they request will permit them to properly address the additional allegations and  
21 separate claims presented by the three sets of Plaintiff Parties in the Consolidated  
22 Complaint;

23 WHEREAS Defense Parties have distinct interests in responding to the claims  
24 raised by Plaintiff Parties, and therefore State Defendants, Defendant-Intervenor  
25 DCCC, and Defendant-Intervenor LULAC plan to file separate motions to dismiss

26 \_\_\_\_\_  
27 <sup>1</sup> In an earlier email, counsel for State Defendants also proposed an extension  
28 of the word limit for the Defense Parties’ memoranda of points and authorities in  
support of their motions to dismiss. Defense Parties and Plaintiff Parties are  
continuing to discuss whether the parties can come to an agreement on this topic.

1 the Consolidated Complaint; and

2 WHEREAS on Monday, April 6, and Tuesday, April 7, 2026, counsel for the  
3 Plaintiff Parties responded via e-mail agreeing to stipulate to the new proposed  
4 deadlines;

5 NOW, THEREFORE, the parties hereby stipulate and respectfully request that  
6 the Court issue an order:

7 (1) Extending Defense Parties’ deadlines to respond to the Consolidated  
8 Complaint by seven days, to and including April 24, 2026; and

9 (2) Setting Plaintiff Parties’ deadlines to respond to the Defense Parties’  
10 motions to dismiss as 28 days after Defense Parties’ motions to dismiss are  
11 filed.

12 Dated: April 8, 2026

13 Respectfully submitted,

14 CALIFORNIA DEPARTMENT OF  
15 JUSTICE

16 /s/ Iram Hasan  
17 IRAM HASAN  
18 Deputy Attorney General  
19 Attorney for Defendants

20 ARNOLD & PORTER KAYE  
21 SCHOLER LLP

22 /s/ John A. Freedman  
23 JOHN A. FREEDMAN  
24 Attorney for Defendant-Intervenor  
25 LULAC

26 ELIAS LAW GROUP LLP

27 /s/ Lalitha D. Madduri  
28 LALITHA D. MADDURI  
Attorneys for Defendant-Intervenor  
DCCC

DHILLON LAW GROUP

/s/ Michael Columbo  
MICHAEL COLUMBO  
Attorney for Tangipa Plaintiffs

UNITED STATES DEPARTMENT  
OF JUSTICE

/s/ Greta Gieseke  
GRETA GIESEKE  
Attorney for Plaintiff-Intervenor

PUBLIC INTEREST LEGAL  
FOUNDATION

/s/ Joseph M. Nixon  
JOSEPH M. NIXON  
Attorney for Noyes Plaintiffs

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**ATTESTATION**

I, Iram Hasan, hereby attest that all signatories listed have concurred in this request's content and have authorized this filing.

/s/ Iram Hasan  
IRAM HASAN

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