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11 Weber*

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

15  
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,  
et al.,**  
24 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' NOTICE OF  
MOTION AND MOTION TO  
DISMISS CONSOLIDATED  
COMPLAINT (ECF NO. 240)**

Date: June 26, 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 Please take notice that on June 26, 2026 at 10:30 a.m. in Courtroom 1 at 350  
2 W 1st Street, Los Angeles, CA 90012, Defendants Gavin Newsom, in his official  
3 capacity as Governor of the State of California, and Dr. Shirley N. Weber, in her  
4 official capacity as California Secretary of State, will move to dismiss the  
5 Consolidated Complaint (ECF No. 240) for lack of subject matter jurisdiction, *see*  
6 Fed. R. Civ. P. 12(b)(1), and failure to state a claim upon which relief can be  
7 granted under the Fourteenth and Fifteenth Amendments to the United States  
8 Constitution and Section 2 of the Voting Rights Act, *see* Fed. R. Civ. P. 12(b)(6);  
9 52 U.S.C. § 10301. This motion is supported by Defendants’ concurrently filed  
10 memorandum of points and authorities, request for judicial notice, and declaration  
11 regarding the parties’ meet-and-confer about this motion.

12  
13 Dated: April 24, 2026

Respectfully submitted,

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15 Attorney General of California  
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28  
*/s/ Iram Hasan*  
\_\_\_\_\_  
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Deputy Attorney General  
*Attorneys for Defendants*  
*Governor’s Office and Office of*  
*Secretary of State*