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

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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' REQUEST FOR  
JUDICIAL NOTICE IN  
SUPPORT OF 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 Pursuant to Rule 201 of the Federal Rules of Evidence, Defendants California  
2 Governor Gavin Newsom and California Secretary of State Shirley Weber  
3 respectfully request that the Court take judicial notice of the documents listed  
4 below and attached hereto. This Request is made in connection with Defendants'  
5 Motion to Dismiss the Consolidated Complaint.

6 **Exhibit 1:** Assemb. Const. Amend. 8, 2025-26 Reg. Sess. (Cal. 2025),  
7 available at <https://tinyurl.com/mrxuk49v> (last visited Apr. 23, 2026). The Court  
8 may take judicial notice of matters of public record, including government  
9 documents, press releases, and legislative materials. *DeHoog v. Anheuser-Busch*  
10 *InBev SA/NV*, 899 F.3d 758, 762 n.5 (9th Cir. 2018). As a legislatively referred  
11 constitutional amendment, Exhibit 1 is properly subject to judicial notice.

12 **Exhibit 2:** Cal. Sec'y. of St., *Official Voter Information Guide*, available at  
13 <https://tinyurl.com/3u6r7p4r> (last visited Apr. 23, 2026). The Court may take  
14 judicial notice of matters of public record, including government documents, press  
15 releases, and legislative materials. *See DeHoog*, 899 F.3d at 762 n.5. As a  
16 government document prepared by the Secretary of State that is a matter of public  
17 record, Exhibit 2 is properly subject to judicial notice.

18 **Exhibit 3:** Proposition 50 Ballot Label (Aug. 27, 2025). The Court may take  
19 judicial notice of matters of public record, including government documents, press  
20 releases, and legislative materials. *DeHoog*, 899 F.3d at 762 n.5. As a government  
21 document prepared by the Secretary of State that is a matter of public record,  
22 Exhibit 3 is properly subject to judicial notice.

23 **Exhibit 4:** Cal. Sec'y of St., *Statement of Vote—November 4, 2025 Statewide*  
24 *Special Election* (Dec. 12, 2025), available at <https://tinyurl.com/3dbsywvu>. The  
25 Court may take judicial notice of matters of public record, including government  
26 documents, press releases, and legislative materials. *DeHoog*, 899 F.3d at 762 n.5.  
27 As a government document prepared by the Secretary of State that is a matter of  
28 public record, Exhibit 4 is properly subject to judicial notice.

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Dated: April 24, 2026

Respectfully submitted,  
  
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*/s/ Ryan Eason*  
\_\_\_\_\_  
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