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15 **DEMOCRACY DEFENDERS ACTION**

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25 **JUSTICE LEGAL STRATEGIES PLLC**

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Counsel for Intervenor-Defendant

League of United Latin American Citizens

*Application for admission pro hac vice forthcoming

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3

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

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

7 **INTERVENOR-DEFENDANT**
8 **LULAC’S NOTICE OF MOTION**
9 **AND MOTION TO DISMISS**
10 **CONSOLIDATED COMPLAINT**

11 v.

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

12 GAVIN NEWSOM, *et al.*,

Hearing Date: June 26, 2026
Time: 10:30 a.m.
Courtroom: 1

13 Defendants,
14

15 and

16 LEAGUE OF UNITED LATIN
17 AMERICAN CITIZENS (LULAC),

Intervenor-Defendant.
18

19 Please take notice that on June 26, 2026 at 10:30 a.m. in Courtroom 1 at 350 W
20 1st Street, Los Angeles, CA 90012, Intervenor-Defendant LULAC will move to
21 dismiss the Consolidated Complaint, Dkt. 240, of the Tangipa Plaintiffs, the Noyes
22 Plaintiffs, and the United States, for failure to state a claim upon which relief can be
23 granted under the Fourteenth and Fifteenth Amendments to the United States
24 Constitution and under Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, and as
25 to Noyes Plaintiffs, for lack of subject matter jurisdiction resulting from lack of
26 standing. *See* Fed. R. Civ. P. 12(b)(1), 12(b)(6). This motion is supported by LULAC’s
27
28

1 concurrently filed memorandum of points and authorities, declaration regarding the
2 parties' meet and confer about this motion, and request for judicial notice.

3 DATED: April 24, 2026

Respectfully submitted,

4 /s/ John A. Freedman

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