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15 **DEMOCRACY DEFENDERS ACTION**

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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,

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

6 **REQUEST FOR JUDICIAL**  
7 **NOTICE IN SUPPORT OF**  
8 **INTERVENOR-DEFENDANT**  
9 **LULAC’S 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.*,  
13  
14 Defendants,

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

15 and  
16 LEAGUE OF UNITED LATIN  
17 AMERICAN CITIZENS (LULAC),  
18 Intervenor-Defendant.

19 Pursuant to Rule 201 of the Federal Rules of Evidence, Intervenor-Defendant  
20 LULAC, in connection with Intervenor-Defendant LULAC’s Motion to Dismiss  
21 Consolidated Complaint, respectfully requests that the Court take judicial notice of the  
22 following document listed below and attached hereto as Exhibit 1: The Official Voter  
23 Information Guide for the November 4, 2025, election (“Voter Guide”) published by  
24 the California Secretary of State, Cal. Sec’y of State, Official Voter Information Guide:  
25 2025 Statewide Special Election (2025), available at  
26  
27  
28

1 <https://vig.cdn.sos.ca.gov/2025/special/pdf/complete-vig.pdf> (last visited April 24,  
2 2026).

3 Pursuant to Section 9094(a) of the California Elections Code, the Secretary of  
4 State was required to prepare and publish this document and mail it to every registered  
5 voter.

6 The Voter Guide satisfies the requirements of Rule 201 as it “is not subject to  
7 reasonable dispute because [its] . . . accuracy cannot reasonably be questioned.” Fed.  
8 R. Evid. 201. *See e.g., Daniels-Hall v. National Education Association*, 629 F.3d 992,  
9 998–99 (9th Cir. 2010) (Ninth Circuit took judicial notice of information on school  
10 district websites at motion to dismiss phase).

11 DATED: April 24, 2026

Respectfully submitted,

12 /s/ John A. Freedman

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