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**Pro hac vice*

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MITCH NOYES, HOLDEN LOMELI,
and ANTHONY MCBROOM,

Plaintiffs,

v.

GAVIN NEWSOM, in his official capacity
as Governor of California; and SHIRLEY
WEBER in her official capacity as
California Secretary of State,
Defendants.

Case No.: 2:25-cv-11480-SPG-PVC
**THREE-JUDGE COURT
REQUESTED**

**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
INJUNCTION**

Date: February 4, 2026
Time: 10:00 a.m.
Courtroom 5C, 5th Floor
Hon. Sherilyn Peace Garnett

Action Filed: December 2, 2025
Trial Date: Not yet set

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

Please take notice that on February 4, 2026 at 10:00a.m., or as soon thereafter as the matter may be heard, before the Honorable Sherilyn Peace Garnett, Courtroom 5C of the United States District Court, Central District of California, 255 E. Temple St., Los Angeles, California, Plaintiffs will and hereby do move this Court for the issuance of a preliminary injunction against Defendants Gavin Newsom, in his official capacity as the Governor of California, and Shirley Weber, in her official capacity as California Secretary of State, as set forth in its [PROPOSED] Order.

This Motion is brought pursuant to Fed. R. Civ. P. 65 and Local Rule 65-1 on the grounds that the entry of a preliminary injunction is appropriate because Plaintiffs established (1) a likelihood of success on the merits of its claims; (2) that it is likely to suffer irreparable harm in the absence of injunctive relief; (3) that the balance of equities tips in Plaintiff's favor; and (4) that the preliminary injunction is in the public interest.

This motion shall be based on this notice of motion and motion, the memorandum of points and authorities in support, the declarations and evidence filed concurrently herewith, and upon any further matters the Court deems appropriate

Under Local Rule 7-3, a conference of counsel is not needed because Plaintiffs are seeking a preliminary injunction.

Dated: January 7, 2026

BENBROOK LAW GROUP, PC

By s/ Bradley A. Benbrook

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