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DEMOCRACY DEFENDERS ACTION

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*Counsel for Proposed Intervenor-Defendant**League of United Latin American Citizens***Application for admission pro hac vice forthcoming*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DAVID TANGIPA. *et al.*,
Plaintiffs,

v.

GAVIN NEWSOM, *et al.*,
Defendants,
and
LEAGUE OF UNITED LATIN
AMERICAN CITIZENS (LULAC),
Intervenor-Defendant.

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

**NOTICE OF MOTION AND
DEFENDANT-INTERVENOR
LEAGUE OF UNITED LATIN
AMERICAN CITIZENS' RULE 24
MOTION TO INTERVENE**

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

Hearing Date: December 3, 2025
Time: TBD
Courtroom: TBD

NOTICE OF MOTION AND MOTION TO INTERVENE

The League of United Latin American Citizens (“LULAC”) respectfully requests that this Court grant it leave to intervene as a defendant in this case as a matter of right under Rule 24(a)(2) of the Federal Rules of Civil Procedure, or, in the alternative, permissively under Rule 24(b)(1)(B).

In support of its Motion, LULAC submits and incorporates the attached Memorandum of Points and Authorities, a Proposed Answer submitted pursuant to Rule 24(c) (Exhibit A)¹, Declarations of Juan Proaño (Exhibit B) and Diego Jacob Sandoval (Exhibit C) on behalf of LULAC, and a Proposed Order.

Pursuant to Local Rule 7-3, counsel for LULAC conferred with counsel for the existing parties on November 13 and 14, 2025. Counsel for Plaintiff opposes this motion. Counsel for Defendants do not oppose this motion. Counsel for Intervenors DCCC and the United States take no position on this motion.

In conjunction with this motion, LULAC is filing an *ex parte* motion to expedite. LULAC requests that the Court grant the motion without any hearing, or alternatively, given the time-sensitive nature of this case, LULAC requests that the Court set a hearing for this Motion (if necessary) as soon as practicable.

¹ While LULAC submits a Proposed Answer as required by Rule 24(c), it reserves the right to file a Rule 12 motion in accordance with any schedule set by the Court.

1 DATED: November 15, 2025

2 /s/ Sean O. Morris

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25 *Counsel for Proposed Intervenor-*
26 *Defendant*

27 *League of United Latin American Citizens*

28 **Application for admission pro hac vice*
forthcoming

Respectfully submitted,

DEMOCRACY DEFENDERS
ACTION

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NOTICE OF MOTION AND DEFENDANT-INTERVENOR LEAGUE OF UNITED LATIN AMERICAN
CITIZENS' RULE 24 MOTION TO INTERVENE

ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4

This certifies, pursuant to Local Rule 5-4.3.4, that all signatories to this document concur in its content and have authorized this filing.

/s/ John Freedman

John Freedman

CERTIFICATE OF SERVICE

Case Name: **Tangipa et al v. Newsom et al** No. **2:25-cv-10616**

I hereby certify that on November 15, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

NOTICE OF MOTION AND DEFENDANT-INTERVENOR LEAGUE OF UNITED LATIN AMERICAN CITIZENS' RULE 24 MOTION TO INTERVENE

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on November 15, 2025, at Washington, D.C.

/s/ John A. Freedman

Signature