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**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

1 THE UNITED STATES OF
2 AMERICA,

3 Plaintiff,

4 v.

5 STATE OF CALIFORNIA; GAVIN
6 NEWSOM, Governor of California,
7 in his Official Capacity; ROBERT
8 BONTA, Attorney General of
9 California, in his Official Capacity,

10 Defendants.

11 No. 2:25-cv-10999

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**NOTICE OF PLAINTIFF'S
MOTION FOR A PRELIMINARY
INJUNCTION**

20 [Proposed] Hearing Information:
21 Monday, December 22, 2025 at 10:00
22 a.m.

23 Honorable Christina A. Snyder
24 United States District Judge

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that Plaintiff, the United States, will, and hereby does,
3 move this Court to grant a preliminary injunction pursuant to Federal Rule of Civil
4 Procedure 65 for the reasons explained in the accompanying memorandum. To allow time
5 for disposition before the laws challenged in this suit take effect on January 1, 2026, this
6 motion is noticed for Monday, December 22, 2025; however, the United States would be
7 amenable to a hearing any day the week of December 15, 2025 that would allow for
8 Defendants' opposition to the motion and Plaintiff's reply.

9 Plaintiff seeks to enjoin Defendants and their successors, agents, and employees
10 from enforcing the challenged provisions of the No Secret Police Act and No Vigilantes
11 Act against federal agencies and officers, until this Court has an opportunity to issue a
12 final judgment on the merits.

13 This motion is based on this Notice, the attached Memorandum in Support, the
14 Declarations of Sergio Albarran, Michael R. Vargas, Michael H. Glasheen, and Matthew
15 W. Allen, the Declaration of Counsel, and any argument the Court may hear. A proposed
16 Order accompanies this motion.

17 Counsel for the United States conferred with counsel for the State of California on
18 November 18, 2025 in accordance with Local Rule 7-3. During the call, the parties
19 discussed the substance and potential resolution of the filed motion but were unable to
20 resolve the dispute. The parties conferred again by video conference on November 25,
21 2025 and discussed a scheduling proposal from Defendants that could obviate the need for
22 resolution of this motion for a preliminary injunction by the January 1, 2026 effective date
23 of the challenged laws. Although the parties did not reach an agreement prior to filing this
24 motion, the parties agreed to confer again and, should they reach an agreement, will file a
25 stipulation with a proposed briefing schedule, including a modified proposed hearing date,
26 for this motion.

1 Dated: November 25, 2025

Respectfully submitted,

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24 /s/ Elisabeth J. Neylan
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