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

THE UNITED STATES OF  
AMERICA,

Plaintiff,

v.

STATE OF CALIFORNIA; GAVIN  
NEWSOM, Governor of California,  
in his Official Capacity; ROBERT  
BONTA, Attorney General of  
California, in his Official Capacity,

Defendants.

No. 2:25-cv-10999

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

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

Honorable Christina A. Snyder  
United States District Judge

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

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

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

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

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

1 Dated: November 25, 2025

Respectfully submitted,

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24 /s/ Elisabeth J. Neylan  
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