

Lightfoot Decl., Exhibit 1, Defendants' Objection to Consolidation

Fwd: Motion to Consolidate with David Tangipa et al v. Gavin Newsom et al

Joe Nixon

Tue 1/6/2026 5:42 PM

To: Jewel Lightfoot <JLightfoot@publicInterestLegal.org>; Carolyn Valdes <CValdes@publicInterestLegal.org>;

Joseph M. Nixon

Board Certified Civil Trial Law, Texas Board of Legal Specialization



Begin forwarded message:

From: Joe Nixon <JNixon@publicinterestlegal.org>
Date: December 9, 2025 at 9:20:00 AM EST
To: a@electionlawcenter.com, Bradley Benbrook <brad@benbrooklawgroup.com>, Steve Duvernay <Steve@benbrooklawgroup.com>
Subject: FW: Motion to Consolidate with David Tangipa et al v. Gavin Newsom et al

Response from the intervenors below:

From: Lali Madduri <lmadduri@elias.law>
Sent: Thursday, December 4, 2025 5:45 PM
To: Jennifer Rosenberg <Jennifer.Rosenberg@doj.ca.gov>; Jewel Lightfoot <JLightfoot@publicInterestLegal.org>; Max Accardi <maccardi@elias.law>; DAulisi@DHILLONLAW.COM; Anya Binsacca <Anya.Binsacca@doj.ca.gov>; Tyler Bishop <tbishop@elias.law>; MColumbo@dhillonlaw.com; scowles@dhillonlaw.com; Chris Dodge <cdodge@elias.law>; Ryan Eason <Ryan.Eason@doj.ca.gov>; Norman@democracydefenders.org; John Freedman <John.freedman@arnoldporter.com>; greta.gieseke@usdoj.gov; sofia@democracydefenders.org; David Green <David.Green@doj.ca.gov>; Nicholas Green <Nicholas.Green@doj.ca.gov>; jgreenbaum@justicels.com; julie.hamill@usdoj.gov; Iram Hasan <Iram.Hasan@doj.ca.gov>; AHulse@dhillonlaw.com; Carter Jansen <Carter.Jansen@doj.ca.gov>; Abha Khanna <akhanna@elias.law>; Harald Kirn <Harald.Kirn@doj.ca.gov>; Jacob@democracydefenders.org; Tianna@democracydefenders.org; Christina McCall <Christina.McCall@doj.ca.gov>; mmeuser@dhillonlaw.com; sean.morris@arnoldporter.com; Jesus.Osete@usdoj.gov; omar@qureshi.law; Daniel Sheehan <Daniel.Sheehan@doj.ca.gov>; Katrina Uyehara <Katrina.Uyehara@doj.ca.gov>; sonniwaknin@gmail.com; Clint Woods <Clint.Woods@doj.ca.gov>; matt.zandi@usdoj.gov; joshua.zuckerman@usdoj.gov; Christopher Hu <Christopher.Hu@doj.ca.gov>; Robert Meyerhoff <Robert.Meyerhoff@doj.ca.gov>; Mark Beckington <Mark.Beckington@doj.ca.gov>
Cc: Joe Nixon <JNixon@publicInterestLegal.org>; Christian Adams <a@electionlawcenter.com>; Carolyn Valdes <CValdes@publicInterestLegal.org>
Subject: RE: Motion to Consolidate with David Tangipa et al v. Gavin Newsom et al

Counsel,

Defendant-Intervenor DCCC also objects to consolidation for purposes of the preliminary injunction proceedings, including the hearing scheduled to begin December 15th.

As State Defendants explained, it would be highly prejudicial to allow for consolidation with just 6 business days remaining before the preliminary injunction hearing, not to mention *after* Defendants and Defendant-Intervenors filed their preliminary injunction opposition briefs and with discovery well underway. Moreover, your complaint appears to raise distinct claims based on distinct allegations, purports to rely on at least one expert, and you have not yet filed a preliminary injunction motion. Consolidation for purposes of anything related to the preliminary injunction motions and proceedings currently pending in *Tangipa v. Newsom* at this late date is not tenable.

Like State Defendants, we are open to discussing consolidation at a later date, after the conclusion of the preliminary injunction proceedings currently underway in *Tangipa*.

Regards,
Lali

Lali Madduri
Partner
Elias Law Group LLP
202-968-4593

CONFIDENTIAL: This email may contain privileged or confidential information and is for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. If you believe that you have received this email in error, please notify the sender immediately and delete it from your system.

From: Jennifer Rosenberg <Jennifer.Rosenberg@doj.ca.gov>

Sent: Thursday, December 4, 2025 4:28 PM

To: Jewel Lightfoot <JLightfoot@publicInterestLegal.org>; Max Accardi <maccardi@elias.law>; DAulisi@DHILLONLAW.COM; Anya Binsacca <Anya.Binsacca@doj.ca.gov>; Tyler Bishop <tbishop@elias.law>; MColumbo@dhillonlaw.com; scowles@dhillonlaw.com; Chris Dodge <cdodge@elias.law>; Ryan Eason <Ryan.Eason@doj.ca.gov>; Norman@democracydefenders.org; John Freedman <John.freedman@arnoldporter.com>; greta.gieseke@usdoj.gov; sofia@democracydefenders.org; David Green <David.Green@doj.ca.gov>; Nicholas Green <Nicholas.Green@doj.ca.gov>; jgreenbaum@justicels.com; julie.hamill@usdoj.gov; Iram Hasan <Iram.Hasan@doj.ca.gov>; AHulse@dhillonlaw.com; Carter Jansen <Carter.Jansen@doj.ca.gov>; Abha Khanna <akhanna@elias.law>; Harald Kirn <Harald.Kirn@doj.ca.gov>; Jacob@democracydefenders.org; Lali Madduri <lmadduri@elias.law>; Tianna@democracydefenders.org; Christina McCall <Christina.McCall@doj.ca.gov>; mmeuser@dhillonlaw.com; sean.morris@arnoldporter.com; Jesus.Osete@usdoj.gov; omar@qureshi.law; Daniel Sheehan <Daniel.Sheehan@doj.ca.gov>; Katrina Uyehara <Katrina.Uyehara@doj.ca.gov>; sonniwaknin@gmail.com; Clint Woods <Clint.Woods@doj.ca.gov>; matt.zandi@usdoj.gov; joshua.zuckerman@usdoj.gov; Christopher Hu <Christopher.Hu@doj.ca.gov>; Robert Meyerhoff <Robert.Meyerhoff@doj.ca.gov>; Mark Beckington <Mark.Beckington@doj.ca.gov>
Cc: Joe Nixon <JNixon@publicInterestLegal.org>; Christian Adams <a@electionlawcenter.com>; Carolyn Valdes <CValdes@publicInterestLegal.org>

Subject: RE: Motion to Consolidate with David Tangipa et al v. Gavin Newsom et al

Good afternoon, Jewel.

The State Defendants strongly oppose your proposal to consolidate the *Noyes* matter with *Tangipa v. Newsom* to the extent you propose to participate in the currently pending preliminary injunction proceedings, including the ongoing limited discovery process and the evidentiary hearing scheduled to begin just 11 days from today. Your participation in the

preliminary injunction phase of that case, with your separate complaint and factual allegations and an additional expert witness, would severely prejudice the State Defendants, who must devote their limited time before the evidentiary hearing to preparing their defense to the existing complaints and preliminary injunction motions. Our position is further bolstered by the fact that you have only sought our position on consolidation after the Defendants and Defendant-Intervenors filed their oppositions to the pending preliminary injunction motions yesterday, and you have not yet filed a preliminary injunction motion in *Noyes*.

Should you wish to consolidate with the *Tangipa* matter for later phases of the case, we would be open to discussing that proposal. But the State Defendants will not consent to your participation in the preliminary injunction phase of the *Tangipa* matter, including but not limited to the fast-approaching evidentiary hearing.

Best,

Jenni

Jenni Rosenberg
Deputy Attorney General
Department of Justice
Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, California 90013-1230
Tel: (213) 269-6617
Fax: (916) 731-2124
E-mail: jennifer.rosenberg@doj.ca.gov

From: Jewel Lightfoot <JLightfoot@publicInterestLegal.org>

Sent: Thursday, December 4, 2025 10:37 AM

To: maccardi@elias.law; DAulisi@DHILLONLAW.COM; Anya Binsacca <Anya.Binsacca@doj.ca.gov>; tbishop@elias.law; MColumbo@dhillonlaw.com; scowles@dhillonlaw.com; cdodge@elias.law; Ryan Eason <Ryan.Eason@doj.ca.gov>; Norman@democracydefenders.org; john.freedman@arnoldporter.com; greta.gieseke@usdoj.gov; sofia@democracydefenders.org; David Green <David.Green@doj.ca.gov>; Nicholas Green <Nicholas.Green@doj.ca.gov>; jgreenbaum@justicels.com; julie.hamill@usdoj.gov; Iram Hasan <Iram.Hasan@doj.ca.gov>; AHulse@dhillonlaw.com; Carter Jansen <Carter.Jansen@doj.ca.gov>; akhanna@elias.law; Harald Kirn <Harald.Kirn@doj.ca.gov>; Jacob@democracydefenders.org; Imadduri@elias.law; Tianna@democracydefenders.org; Christina McCall <Christina.McCall@doj.ca.gov>; mmeuser@dhillonlaw.com; sean.morris@arnoldporter.com; Jesus.Osete@usdoj.gov; omar@qureshi.law; Jennifer Rosenberg <Jennifer.Rosenberg@doj.ca.gov>; Daniel Sheehan <Daniel.Sheehan@doj.ca.gov>; Katrina Uyehara <Katrina.Uyehara@doj.ca.gov>; sonniwagnin@gmail.com; Clint Woods <Clint.Woods@doj.ca.gov>; matt.zandi@usdoj.gov; joshua.zuckerman@usdoj.gov
Cc: Joe Nixon <JNixon@publicInterestLegal.org>; Christian Adams <a@electionlawcenter.com>; Carolyn Valdes <CValdes@publicInterestLegal.org>

Subject: Motion to Consolidate with David Tangipa et al v. Gavin Newsom et al

<p>EXTERNAL EMAIL: This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.</p>

Counsel,

#715
We intend to file a motion to consolidate our case (2:25-cv-11480) with yours. We have one witness (John B. Morgan) whose report we attached to our complaint. We will make him available for deposition at your earliest convenience.

Do you consent or oppose to our motion to consolidate?

Please respond today if possible.

V/r,



Jewel Morris Lightfoot IV
Public Interest Legal Foundation
Litigation Counsel
Maryland AIS #: 2112140263
Texas Bar #: 24138965
New York Bar #: 6147284
JLightfoot@publicInterestLegal.org

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.