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

MITCH NOYES, HOLDEN LOMELI,
and ANTHONY MCBROOM,

Plaintiffs,

vs.

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
**THREE-JUDGE COURT
REQUESTED**

**DECLARATION OF JEWEL M.
LIGHTFOOT IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

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

1 I, Jewel M. Lightfoot, declare:

2 1. I am an attorney, licensed to practice law in the States of New York, Maryland, and
3 Texas, and an attorney with the Public Interest Legal Foundation, counsel of record for Plaintiffs in
4 this matter. The following facts are within my personal knowledge.

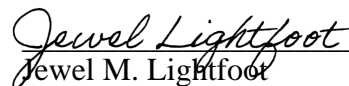
5 2. On December 2, 2025, Plaintiffs filed their Complaint (ECF No. 1) in the case of *Noyes v.*
6 *Newsom* (Case No. 2:25-cv-11480).

7 3. On December 4, 2025 at 10:37 AM, I e-mailed Plaintiffs and Defendants currently
8 litigating *David Tangipa et al v. Gavin Newsom et al* (Case No. 2:25-cv-10616-JLS-KES), notifying
9 them of our case, and asking if they would consent or oppose to a motion to consolidate.
10

11 4. On December 4, 2025 at 4:28 PM and December 9, 2025 at 9:20 a.m., California Deputy
12 Attorney General Jenni Rosenberg and Elias Law Group LLP Partner Lali Madduri both opposed
13 consolidating in their responsive e-mails respectively.
14

15 I declare under penalty of perjury under the laws of the United States of America and State
16 of California that the foregoing is true and correct to the best of my knowledge.

17 Executed on January 7th, 2026.

18 
19 Jewel M. Lightfoot