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11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 **DAVID TANGIPA, et al.,**

16 Plaintiffs,

17 and

18 **UNITED STATES OF AMERICA,**

19 Plaintiff-Intervenor

20 v.

21 **GAVIN NEWSOM, in his official**  
22 **capacity as the Governor of California,**  
**et al.,**

23 Defendants,

24 and

25 **DEMOCRATIC CONGRESSIONAL**  
26 **CAMPAIGN COMMITTEE, et al.,**

27 Defendant-Intervenors.  
28

2:25-cv-10616-JLS-WLH-KKL  
Three-Judge Court

**DECLARATION OF RYAN  
EASON IN SUPPORT OF  
DEFENDANTS' OPPOSITION  
TO PLAINTIFFS' AND  
PLAINTIFF-INTERVENOR'S  
MOTIONS FOR PRELIMINARY  
INJUNCTION**

Date: Dec. 15, 2025  
Time: 9:00 a.m.  
Courtroom: 1  
Judge: Hon. Josephine L.  
Staton, Hon. Kenneth  
K. Lee, and Hon.  
Wesley L. Hsu  
Trial Date: None Designated  
Action Filed: Nov. 5, 2025

1 I, Ryan Eason, hereby declare as follows:

2 1. I am a Deputy Attorney General with the California Department of  
3 Justice and serve as counsel in this action for Defendants Gavin Newsom, in his  
4 official capacity as the Governor of California, and Shirley N. Weber, in her official  
5 capacity as California Secretary of State. I make this declaration in support of  
6 Defendants' Opposition to Plaintiffs' and Plaintiff-Intervenor's Motions for  
7 Preliminary Injunction. I have personal, first-hand knowledge of the matters set  
8 forth below and, if called as a witness, I could and would testify competently  
9 thereto.

10 2. Attached hereto as **Exhibit 1** is a true and correct copy of emails sent  
11 by Plaintiff California Republican Party to its subscribers encouraging them to  
12 oppose Proposition 50 ("Prop 50") or donate funds toward that effort.

13 3. Attached hereto as **Exhibit 2** is a true and correct copy of a social  
14 media post from Assemblymember David Tangipa on X, dated Nov. 13, 2025,  
15 available at <https://perma.cc/C5CZ-5YQM>.

16 4. Attached hereto as **Exhibit 3** is a true and correct copy of the U.S.  
17 Census website defining "Hispanic or Latino," available at  
18 <https://tinyurl.com/3c9cj2z4>.

19 5. Attached hereto as **Exhibit 4** is a true and correct copy of the Brief for  
20 the United States as Amicus Curiae in Support of Applicants filed on Nov. 24,  
21 2025, in *Abbott v. LULAC*, No. 25A608, a case pending before the United States  
22 Supreme Court, available at <https://tinyurl.com/u33njp46>.

23 6. Attached hereto as **Exhibit 5** is a true and correct copy of the  
24 California Citizens Redistricting Commission's "About Us" webpage, available at  
25 <https://tinyurl.com/yyt8mraw>.

26 7. Attached hereto as **Exhibit 6** is a true and correct copy of the New  
27 York Times article *White House Pushes Texas to Redistrict, Hoping to Blunt*  
28 *Democratic Gains* by Nick Corasaniti and J. David Goodman, published on June 9,

2025, and available at <https://tinyurl.com/23eb3fbt>.

8. Attached hereto as **Exhibit 7** is a true and correct copy of a social media post from California Governor Gavin Newsom on Threads, dated Aug. 18, 2025, available at <https://tinyurl.com/2vuap54f>.

9. Attached hereto as **Exhibit 8** is a true and correct copy of a social media post from California Governor Gavin Newsom on Threads, dated Aug. 21, 2025, available at <https://tinyurl.com/yj45tj9y>.

10. Attached hereto as **Exhibit 9** is a true and correct copy of a social media post from California Governor Gavin Newsom attaching a letter sent by Governor Newsom to President Donald Trump on August 11, 2025, available at <https://tinyurl.com/4h8ewd2d>.

11. Attached hereto as **Exhibit 10** is a true and correct copy of California Governor Gavin Newsom's Press Release dated August 14, 2025, announcing the Proposition 50 effort, available at <https://tinyurl.com/yw4bndjt>.

12. Attached hereto as **Exhibit 11** is a true and correct copy of California Governor Gavin Newsom's Press Release dated August 21, 2025, announcing his signing of the Election Rigging Response Act bills, available at <https://tinyurl.com/34fu7xdv>.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the records of the August 19, 2025, hearing of the Assembly Elections Committee regarding ACA 8, 2025-26 Reg. Sess., available at <https://tinyurl.com/m8699f39>.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the records of the August 19, 2025, hearing of the Assembly Elections Committee regarding AB 604, 2025-26 Reg. Sess., available at <https://tinyurl.com/mr4cmwcu>.

15. Attached hereto as **Exhibit 14** is a true and correct copy of text messages sent by Plaintiff California Republican Party to its subscribers encouraging them to oppose Proposition 50 ("Prop 50") or donate funds toward that effort.

1           16.       Attached hereto as **Exhibit 15** is a true and correct copy of Dr. Sean  
2       Trende’s Declaration in the Emergency Petition for Writ of Mandate in *Sanchez v.*  
3       *Weber*, No. S292592 (Cal. Aug. 25, 2025). Only the caption page and Dr. Trende’s  
4       declaration are included for the convenience of the Court.

5           17.       Attached hereto as **Exhibit 16** is a true and correct copy of United  
6       States Attorney General Pam Bondi’s Press Release regarding Plaintiff-Intervenor’s  
7       entry into the current matter, dated Nov. 13, 2025, available at  
8       <https://tinyurl.com/df3u78jj>.

9           18.       Attached hereto as **Exhibit 17** is a true and correct copy of a social  
10      media post from United States Attorney General Pam Bondi on X, dated Nov. 13,  
11      2025, available at <https://tinyurl.com/46k93xpf>.

12          19.       Attached hereto as **Exhibit 18** is a true and correct copy of a webpage  
13      from Reform California dated Aug. 14, 2025, in which Assemblymember Carl  
14      DeMaio characterizes Prop 50 as a “partisan redistricting scheme,” available at  
15      <https://tinyurl.com/mtfsdp3r>.

16          20.       Attached hereto as **Exhibit 19** is a true and correct copy of a webpage  
17      from Reform California dated Aug. 21, 2025, in which the group characterizes the  
18      intent of Prop 50 as “protect[ing] partisan politicians,” available at  
19      <https://tinyurl.com/nhaje4ry>.

20          21.       Attached hereto as **Exhibit 20** is a true and correct copy of a webpage  
21      from Reform California dated Aug. 1, 2025, in which the group characterizes the  
22      intent of Prop 50 as “eliminating Republican-held seats and cementing one-party  
23      rule for years to come,” available at <https://perma.cc/9GSG-94P9>.

24          22.       Attached hereto as **Exhibit 21** is a true and correct copy of a webpage  
25      from No on Prop 50 – Protect Voters First, available at <https://noonprop50.org/>.

26          23.       Attached hereto as **Exhibit 22** is a true and correct copy of a social  
27      media post from NRCC spokesperson Christian Martinez on X, dated Aug. 14,  
28      2025, available at <https://perma.cc/X6KP-7E7B>.

1           24.       Attached hereto as **Exhibit 23** is a true and correct copy of a social  
2 media post from Representative Ken Calvert on X, dated Oct. 17, 2025, available at  
3 <https://perma.cc/UYE9-3Q3E>.

4           25.       Attached hereto as **Exhibit 24** is a true and correct copy of a social  
5 media post from Representative Darrell Issa on X, dated Nov. 4, 2025, available at  
6 <https://perma.cc/LF2M-6CNF>.

7           26.       Attached hereto as **Exhibit 25** is a true and correct copy of the  
8 California Secretary of State's website showing the results for Proposition 50 as of  
9 December 3, 2025, available at <https://tinyurl.com/suath7su>.

10          27.       Attached hereto as **Exhibit 26** is a true and correct copy of a CNN  
11 graphic showing exit polls of Proposition 50, available at  
12 <https://tinyurl.com/57vk8jnr>.

13          28.       Attached hereto as **Exhibit 27** is a true and correct copy of the  
14 Supreme Court of California's opinion denying a petition for writ of mandate and  
15 application for stay in *Strickland v. Weber*, No. S292490, 2025 Cal. LEXIS 5421  
16 (Cal. Aug. 20, 2025).

17          29.       Attached hereto as **Exhibit 28** is a true and correct copy of the  
18 Supreme Court of California's opinion denying a petition for writ of mandate and  
19 application for stay in *Sanchez v. Weber*, No. S292592, 2025 Cal. LEXIS 5694  
20 (Cal. Aug. 27, 2025).

21          30.       Attached hereto as **Exhibit 29** is a true and correct copy of the United  
22 States District Court for the Northern District of Texas's opinion granting  
23 Defendant California Secretary of State Shirley N. Weber's motion to dismiss in  
24 *Jackson v. Weber*, No. 2:25-cv-197-z, 2025 U.S. Dist. LEXIS 208742 (N.D. Tex.  
25 Oct. 23, 2025).

26          31.       Attached hereto as **Exhibit 30** is a true and correct copy of the United  
27 States District Court for the Northern District of Texas's order dismissing the  
28 plaintiffs' claims in *Jackson v. Weber*, No. 2:25-cv-197-z, ECF No. 12 (N.D. Tex.

1 Oct. 31, 2025).

2 32. Attached hereto as **Exhibit 31** is a true and correct copy of the United  
3 States District Court for the Central District of California's order dismissing the  
4 plaintiffs' claims in *Hilton v. Weber*, No. 8:25-cv-01988-KK-E, ECF No. 47 (C.D.  
5 Cal. Nov. 4, 2025).

6 33. Attached hereto as **Exhibit 32** is a true and correct copy of an August  
7 19, 2025, Press Release from California Senate President Pro Tem Mike McGuire  
8 on Proposition 50, available at <https://tinyurl.com/bp6jck86>.

9 34. Attached hereto as **Exhibit 33** is a true and correct copy of a social  
10 media post from California Senate President Pro Tem Mike McGuire on X, dated  
11 Aug. 21, 2025, available at <https://tinyurl.com/5b2665j9>.

12 35. Attached hereto as **Exhibit 34** is a true and correct copy of a social  
13 media post from California Assemblymember Cecilia Aguiar-Curry on Facebook,  
14 dated Aug. 8, 2025, available at <https://tinyurl.com/yx865jn4>.

15 36. Attached hereto as **Exhibit 35** is a true and correct copy of a social  
16 media post from California Assemblymember David Tangipa on X, dated Nov. 19,  
17 2025, available at <https://tinyurl.com/3psxs6yu>.

18 37. Attached hereto as **Exhibit 36** is a true and correct copy of press  
19 releases from California Assemblymember David Tangipa related to his efforts to  
20 oppose Prop 50.

21 38. Attached hereto as **Exhibit 37** is a true and correct copy of the official  
22 webpage of United States Representative Lucille Roybal-Allard, available at  
23 <https://tinyurl.com/fnrnn4r4>.

24 39. Attached hereto as **Exhibit 38** is a true and correct copy of a N.Y.  
25 Times interactive graphic showing 2020 election results in Congressional District  
26 40, available at <https://tinyurl.com/rn5z9p5c>.

27 40. Attached hereto as **Exhibit 39** is a true and correct copy of Appendix 3  
28 of the California Citizens Redistricting Commission's final report on 2011

1 redistricting, dated August 15, 2011, available at <https://tinyurl.com/5xbu64rz>.

2 41. Attached hereto as **Exhibit 40** is a true and correct copy of the final  
3 Proposition 50 map drawn by the Legislature and enacted by AB 604, including  
4 images and descriptions of all 52 districts, available at <https://tinyurl.com/bdfafdpz>.

5 42. Attached hereto as **Exhibit 41** is a true and correct copy of an image of  
6 District 40 from the final map drawn by the Commission in 2011,  
7 <https://tinyurl.com/38z6d678>.

8 43. Attached hereto as **Exhibit 42** is a true and correct copy of the official  
9 webpage of United States Representative Robert Garcia.

10 44. Attached hereto as **Exhibit 43** is a true and correct copy of ABC10  
11 article, *The next steps in California Democrats' plan to counter Texas Republicans'*  
12 *redistricting push* by the Associated Press, published and updated on August 15,  
13 2025, and available at <https://tinyurl.com/yzpek88p>.

14 45. Attached hereto as **Exhibit 44** is a true and correct copy of an article  
15 from the Center for Politics – Sabato’s Crystal Ball titled *The 2024 Crossover*  
16 *House Seats: Overall Number Remains Low with Few Harris-District Republicans*,  
17 dated Jan. 16, 2025, and available at <https://tinyurl.com/4kewnum2>.

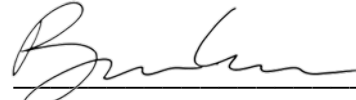
18 46. Attached hereto as **Exhibit 45** is a true and correct copy of a webpage  
19 from Ballotpedia covering Representative Adam Gray’s electoral history, available  
20 at <https://tinyurl.com/36eah5p>.

21 47. Attached hereto as **Exhibit 46** is a true and correct copy of the  
22 Sacramento Bee article *Would Prop. 50 really flip two Central Valley seats? It’s a*  
23 *gamble* by Nicole Nixon, published on October 30, 2025, and available at  
24 <https://tinyurl.com/bdctwwj8>.

25 48. Attached hereto as **Exhibit 47** is a true and correct copy of a study  
26 conducted by Eric McGhee for the Public Policy Institute of California titled *How*  
27 *Would the Prop 50 Redistricting Plan Affect Racial and Geographic*  
28 *Representation?* dated Oct. 8, 2025, and available at <https://tinyurl.com/33j8fjwe>.



1 I declare under penalty of perjury that the statements in this declaration are  
2 true and correct. Executed on December 3, 2025, in Los Angeles, California.

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6 Ryan Eason  
7 Deputy Attorney General  
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