

JESUS A. OSETE*
Principal Deputy Assistant Attorney General
MATTHEW ZANDI (CA No. 203329)
Chief of Staff & Special Counsel
MAUREEN RIORDAN (NY No. 2058840)
Acting Chief, Voting Section
ANDREW BRANIFF (IN No. 23430-71)
Acting Chief, Appellate Section
DAVID GOLDMAN (VA No. 98922)
JOSHUA R. ZUCKERMAN (DC No. 1724555)
GRETA GIESEKE (TX No. 24132925)

Attorneys
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530
Telephone: (202) 514-3847
E-Mail: matt.zandi@usdoj.gov

TODD BLANCHE
Deputy Attorney General
BILAL A. ESSAYLI
First Assistant United States Attorney
JULIE A. HAMILL (CA No. 272742)
Assistant United States Attorney
United States Attorney's Office
300 North Los Angeles Street, Suite 7516
Los Angeles, California 90012
Telephone: (213) 894-2464
E-Mail: julie.hamill@usdoj.gov

Attorneys for Plaintiff-Intervenor
UNITED STATES OF AMERICA

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

DAVID TANGIPA, *et al.*,
Plaintiffs,
and

UNITED STATES OF AMERICA,
Plaintiff-Intervenor,
v.

GAVIN NEWSOM, in his official

Case No. 2:25-cv-10616-JLS-KES
Three-Judge Court

DECLARATION OF MATT ZANDI IN
SUPPORT OF PLAINTIFF
INTERVENOR'S REPLY TO
DEFENDANTS' OPPOSITION TO
PLAINTIFF INTERVENOR'S MOTION
FOR A PRELIMINARY INJUNCTION

* Assistant Attorney General Harmeet K. Dhillon is recused from this matter.

1 capacity as the Governor of California, *et*
2 *al.*,
3 *Defendants*,

Hon. Josephine L. Staton
Hon. Wesley L. Hsu
Hon. Kenneth K. Lee

Hearing Date: December 15, 2025
Time: 9 a.m.
Courtroom: One

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9 I, Matthew Zandi, do hereby declare and state as follows.

10 1. I am a Special Counsel in the United States Department of Justice, Civil
11 Rights Division. I am admitted to practice in the Central District of California and
12 represent the United States in the above-captioned matter.

13 2. This Declaration is being submitted in support of the Plaintiff Intervenor's
14 Reply to Defendants' Opposition to Plaintiff-Intervenors' Motion for a Preliminary
15 Injunction.

16 3. The statements made in this Declaration are based on the knowledge
17 acquired by me in the performance of my official duties and in conjunction with
18 factual and legal research conducted by other attorneys and staff at the Department
19 of Justice.

20 4. Attached hereto as Appendix A is a true and correct copy of correspondence
21 between counsel for Paul Mitchell, Plaintiffs, and Plaintiff-Intervenor, dated
22 December 10, 2025.

23 5. Attached hereto as Appendix B is a true and correct copy of correspondence
24 between HOPE and the Commissioners of the California Redistricting
25 Commission.

1 Having reviewed this Declaration, I declare, under penalty of perjury and
2 pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

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4 Executed on December 10, 2025, in Washington, D.C.

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6 Respectfully submitted,

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8 s/ Matthew Zandi
9 MATTHEW ZANDI
Chief of Staff & Special Counsel
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