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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 GRETA GIESEKE
IN SUPPORT OF PLAINTIFF-
INTERVENOR'S REPLY TO
DEFENDANT-INTERVENOR DCCC'S
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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10 I, Greta Gieseke, do hereby declare and state as follows.

11 1. I am a Trial Attorney in the United States Department of Justice, Civil Rights
12 Division. I am admitted to practice in the State of Texas and represent the United States
13 in the above-captioned matter.

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

17 3. The statements made in this Declaration are based on the knowledge acquired by
18 me in the performance of my official duties and in conjunction with factual and legal
19 research conducted by other attorneys and staff at the Department 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 December
22 10, 2025.

23 5. Attached hereto as Appendix B is a true and correct copy of a transcript of the
24 deposition of Bernard Grofman, dated December 4, 2025.

25 6. Attached hereto as Appendix C is a true and correct copy of a rough draft transcript
26 of the deposition of Maxwell Palmer, dated December 8, 2025.

1 7. Attached hereto as Appendix D is a true and correct copy of a rough draft transcript
2 of the deposition of Jonathan Rodden, dated December 5, 2025.

3 8. Attached hereto as Appendix E is a true and correct copy of a rough draft transcript
4 of the deposition of Anthony Fairfax, dated December 9, 2025
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6 Having reviewed this Declaration, I declare, under penalty of perjury and pursuant
7 to 28 U.S.C. § 1746, that the foregoing is true and correct.
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10 Executed on December 10, 2025, in Washington, D.C.
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12 Respectfully submitted,
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14 s/ Greta Gieseke
15 GRETA GIESEKE
16 Trial Attorney
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