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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  
DEFENDANT-INTERVENOR LULAC'S  
OPPOSITION TO PLAINTIFF-  
INTERVENOR'S MOTION FOR A  
PRELIMINARY INJUNCTION

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\* 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**

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

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

14 2. This Declaration is being submitted in support of Plaintiff-Intervenor's Reply to  
15 Defendant-Intervenor LULAC's Opposition to Plaintiff-Intervenors' 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 a Letter from Hispanas  
21 Organized for Political Equality to the Commissioners of the California Citizens  
22 Redistricting Commission, dated November 24, 2021.

23 5. Attached hereto as Appendix B is a true and correct copy of a transcript of the  
24 deposition of Anthony Fairfax, dated December 9, 2025.

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

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

Respectfully submitted,

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