

EXHIBIT 1

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and Secretary of State Shirley Weber*
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
capacity as the Governor of California,
et al.,**

22 Defendants,

23 and

24 **DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE, et al.,**

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

**DEFENDANT GOVERNOR
GAVIN NEWSOM'S RESPONSE
TO PLAINTIFFS' AND
PLAINTIFF-INTERVENOR'S
INTERROGATORIES, SET ONE**

Trial Date: None Designated
Action Filed: Nov. 5, 2025

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the
2 Court's November 21, 2025 order granting expedited discovery, ECF No. 81,
3 Defendant Governor Gavin Newsom (Defendant), named as a defendant in his
4 official capacity, provides the following objections and responses to Plaintiffs' and
5 Plaintiff-Intervenors' Interrogatories, Nos. 1–5.

6 **PRELIMINARY STATEMENT**

7 Defendant has not yet completed the investigation of the facts and discovery
8 relating to this case. All of the responses contained herein are based solely upon
9 information and documents that are presently available to and specifically known
10 by Defendant and disclose only those contentions that presently occur to him. It is
11 possible that further factual investigation, legal research, factual and legal analysis,
12 or discovery could lead to additions, changes, or variations to these objections and
13 responses. Defendant reserves the right to supplement, clarify, revise, or correct
14 any or all of the following objections and responses. Further, Defendant makes the
15 following objections and responses without agreeing or implying that any of the
16 Interrogatories are relevant to the subject matter of this case.

17 **GENERAL OBJECTIONS**

18 1. Defendant objects to each Interrogatory that seeks information or
19 material that is protected from discovery by the attorney-client privilege, the
20 attorney work-product doctrine, legislative privilege, deliberative process privilege,
21 the official information privilege, the common-interest and joint-defense privileges,
22 and/or any other applicable privilege or protection. By responding to these
23 Interrogatories, Defendant does not intend to waive any applicable privilege or
24 protection.

25 2. Defendant objects to each Interrogatory to the extent that it seeks
26 information not within Defendant's knowledge or control.
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1 3. Defendant objects to each Interrogatory to the extent that it seeks
2 information that is not relevant to any claim or defense at issue in this case, and to
3 the extent that any Interrogatory seeks information that is not proportional to the
4 needs of the case.

5 4. Defendant objects to each Interrogatory to the extent that it imposes
6 obligations that exceed the scope of Defendant's obligations under the Federal
7 Rules of Civil Procedure, the Local Rules of the United States District Court for the
8 Central District of California, or applicable court orders.

9 5. Defendant objects to each Interrogatory insofar as it seeks information
10 that is already contained within the evidence, pleadings, and filings in this matter.

11 6. Defendant objects to each Interrogatory, including all definitions and
12 instructions therein, that does not describe with reasonable particularity the
13 information sought or to the extent that it is overbroad, unduly burdensome, vague,
14 ambiguous, or irrelevant.

15 7. Defendant objects to each Interrogatory to the extent that it is
16 duplicative, overlapping, or cumulative.

17 8. Defendant objects to each Interrogatory as unduly burdensome to the
18 extent that it seeks information already in Plaintiffs' possession, custody, or control,
19 or information that is readily accessible from publicly available or third-party
20 sources and thus equally accessible to Plaintiffs. Defendant further objects to each
21 Interrogatory as unduly burdensome to the extent that it seeks to impose an
22 obligation to obtain information or documents not within his possession, custody,
23 or control.

24 9. Defendant expressly reserves all objections to any attempt to introduce
25 as evidence in any proceeding any of the following responses to the Interrogatories.
26 Defendant's responses to these Interrogatories are subject to all objections
27 ordinarily available if such statements were offered into evidence in a judicial
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1 proceeding. All such objections (including, but not limited to, all objections
2 concerning relevancy, materiality, propriety, authenticity, and admissibility) are
3 hereby expressly reserved and may be interposed at the time of trial or at any other
4 time. By responding to the Interrogatories, Defendant does not concede the
5 relevancy, materiality, or admissibility of any information, and no response shall be
6 construed as a waiver by Defendant of all or any part of any objection to any
7 Interrogatory or an admission of the existence of any facts set forth in or assumed
8 by any Interrogatory.

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10 10. Defendant objects to each Interrogatory to the extent that it is intended
11 to limit Defendant's rights to rely on any documents, information, or witness for
12 any purpose that may result from the Interrogatory.

13 11. Defendant objects to the definition of the "Proposition 50 Map" as
14 vague, ambiguous, and confusing. Plaintiffs and Plaintiff-Intervenor (together,
15 Plaintiff) define it to mean "the map of California congressional districts that went
16 into effect following the November 4, 2025, statewide special election on Assembly
17 Constitutional Amendment 8." But as of this date, no new California congressional
18 district map has gone into effect since the November 4, 2025, statewide special
19 election.

20 12. Defendant objects to the definition of "Challenged Districts" as vague,
21 ambiguous, and confusing as incorporating in the defined term "Proposition 50
22 Map," which is itself vague, ambiguous, and confusing.

23 13. Defendant has not completed discovery, analysis, or preparation for
24 trial in this case. Each response is true and correct to the best of Defendant's
25 knowledge as of this date, and Defendant reserves the right to provide information
26 that is subsequently discovered or not previously provided as the result of
27 oversight, inadvertence, or mistake. Defendant also reserves the right to
28 supplement the following responses to the extent necessary and appropriate.

1 Furthermore, these responses are prepared based on Defendant's good-faith
2 interpretation and understanding of each Interrogatory, and are subject to correction
3 for inadvertent errors, mistake, oversight, misinterpretation, or otherwise, and if
4 any.

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6 **INTERROGATORY NO. 1:**

7 For each of the Challenged Districts, describe all criteria that were actually
8 applied in drawing the district's boundaries, including but not limited to: (a) race or
9 ethnicity; (b) Hispanic or Latino CVAP; (c) historic partisan performance; (d)
10 whether it is a VRA District; and (e) compliance with the VRA.

11 **RESPONSE TO INTERROGATORY NO. 1:**

12 Defendant incorporates by reference the objections stated above as if fully set
13 forth herein. Defendant objects to the interrogatory to the extent that it seeks expert
14 materials, including information or facts that expert witnesses may locate or rely
15 on, outside of the framework for expert disclosures. Defendant objects to the
16 interrogatory as overly broad and impermissibly compound. Defendant further
17 objects that this Interrogatory seeks information or material not within Defendant's
18 possession, custody, or control. Defendant further objects that this Interrogatory
19 improperly seeks or requires Defendant to make a factual and/or legal
20 determination regarding the basis for the actions, decisions, or conclusions of third
21 parties. Defendant further objects that this Interrogatory seeks information or
22 material protected from discovery by the attorney-client privilege, the attorney
23 work-product privilege, the executive privilege, the deliberative-process privilege,
24 the common-interest and joint-defense privileges, and the legislative privilege. *See,*
25 *e.g., Mi Familia Vota v. Fontes*, 129 F.4th 691, 731 (9th Cir. 2024) ("Legislative
26 privilege . . . generally shields legislators from compulsory evidentiary process.")
27 (citing *Lee v. City of L.A.*, 908 F.3d 1175, 1187–88 (9th Cir. 2018)); *Am. Trucking*
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1 *Ass'ns, Inc. v. Alviti*, 14 F.4th 76, 87 (1st Cir. 2021) (legislative privilege extends to
2 governor with respect to legislative acts) (citing *Bogan v. Scott-Harris*, 523 U.S.
3 44, 54–55 (1998)); *Jones v. Allison*, 9 F.4th 1136, 1140 (9th Cir. 2021) (holding
4 that executive branch officials of the California Department of Corrections and
5 Rehabilitation were entitled to legislative immunity).

6 Subject to and without waiving any of the foregoing objections, Defendant
7 responds that as reflected in publicly available information, Defendant understands
8 that the principal criterion that was applied was to counteract partisan redistricting
9 by President Trump and Republicans in other states. Explaining Proposition's 50
10 purpose, the ballot materials for Proposition 50 state that "[i]t is the intent of the
11 people that California's temporary maps be designed to neutralize the partisan
12 gerrymandering being threatened by Republican-led states without eroding fair
13 representation for all communities." Defendant also understands that the legislative
14 history for the legislative package leading to Proposition 50 describes similar
15 principal criteria, with the author of AB 604 stating:

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17 The temporary congressional district boundaries laid out in AB 604 follow the
18 principles that California voters value most in establishing legislative districts.
19 The proposed map maintains the geographic integrity of even more cities than
20 the current map adopted by the Citizens Redistricting Commission.
21 Importantly, the temporary map in AB 604 will also ensure that communities
22 of interest remain intact—a key principle of the constitutional amendment
23 establishing the Citizens Redistricting Commission—to exercise their
24 collective voice and vote to elect officials who truly represent them. AB 604
25 does all of this without diluting or favoring the voting power of any one voter
26 over another. . . . AB 604 not only appropriately responds to the mid-cycle
27 redistricting attempts by President Trump and Republicans in Texas and other
28 states, but also adheres to redistricting principles that Californians hold dear
— from protecting the many types of communities of interest in our state, to
not favoring incumbents, to maintaining the geographic integrity of
neighborhoods.

1 Based on statements made by Paul Mitchell, Defendant understands that Mr.
2 Mitchell described similar criteria, and drew a new congressional map to achieve
3 the stated goal of neutralizing the redistricting then underway in Texas, which was
4 projected to flip five seats from Democratic to Republican control. In working to
5 achieve this partisan goal, it is Defendant's understanding based on public
6 statements made by Mr. Mitchell that Mr. Mitchell also considered the following
7 criteria: minimizing the changes to the existing Citizen's Redistricting Commission
8 map, following redistricting principles, preserving communities of interest and
9 geographic integrity, bolstering democratic candidates throughout the State, and
10 ensuring compliance with the federal Voting Rights Act.

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12 **INTERROGATORY NO. 2:**

13 For each of the Challenged Districts, state whether, at the time the
14 Proposition 50 Map was drawn, any target or minimum level of Hispanic or Latino
15 CVAP, or of any other racial or ethnic group, was proposed or discussed. If so,
16 identify: (a) the target or range; (b) when and by whom it was proposed; (c) all
17 reasons given for pursuing that target; and (d) whether that target was described as
18 necessary to create a VRA District or allow Hispanic or Latino voters to elect their
19 preferred candidates.

20 **RESPONSE TO INTERROGATORY NO. 2:**

21 Defendant incorporates by reference the objections stated above as if fully set
22 forth herein. Defendant objects to the interrogatory to the extent that it seeks expert
23 materials, including information or facts that expert witnesses may locate or rely
24 on, outside of the framework for expert disclosures. Defendant objects to the
25 interrogatory as overly broad and impermissibly compound. Defendant further
26 objects that this Interrogatory seeks information or material not within Defendant's
27 possession, custody, or control. Defendant further objects that this Interrogatory
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1 improperly seeks or requires Defendant to make a factual and/or legal
2 determination regarding the basis for the actions, decisions, or conclusions of third
3 parties. Defendant further objects that this Interrogatory seeks information or
4 material protected from discovery by the attorney-client privilege, the attorney
5 work product privilege, the legislative privilege, the executive privilege, the
6 deliberative-process privilege, the common-interest and joint-defense privileges,
7 and the legislative privilege. *See, e.g., Mi Familia Vota*, 129 F.4th at 731
8 (“Legislative privilege . . . generally shields legislators from compulsory
9 evidentiary process.”) (citing *Lee*, 908 F.3d at 1187–88); *Am. Trucking Ass’n, Inc.*,
10 14 F.4th at 87 (legislative privilege extends to governor with respect to legislative
11 acts) (citing *Bogan*, 523 U.S. at 54–55).

12 Subject to and without waiving any of the foregoing objections, Defendant
13 responds that to Defendant’s knowledge, no “target or minimum level of Hispanic
14 or Latino CVAP, or of any other racial or ethnic group, was proposed or discussed”
15 in drawing the Proposition 50 Map boundaries.

16 **INTERROGATORY NO. 3:**

17 Identify and describe all VRA Analyses prepared, received, or considered by
18 You before or during the drafting and adoption of the Proposition 50 Map by the
19 California Legislature that showed or purported to show a need to create more VRA
20 Districts statewide than existed under the Commission Map, and for each such
21 VRA Analysis, identify: (a) the person who prepared it; (b) the date on which it was
22 prepared; (c) the geographic area or districts analyzed; and (d) the role it played in
23 drawing the any of the Challenged Districts.

24 **RESPONSE TO INTERROGATORY NO. 3:**

25 Defendant incorporates by reference the objections stated above as if fully set
26 forth herein. Defendant objects to the interrogatory to the extent it seeks expert
27 materials, including information or facts that expert witnesses may locate or rely
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1 upon, outside of the framework for expert disclosures. Defendant objects to the
2 interrogatory as impermissibly compound. Defendant further objects that this
3 Interrogatory seeks information or material not within Defendant's possession,
4 custody, or control. Defendant further objects that this Interrogatory seeks
5 information or material protected from discovery by the attorney-client privilege,
6 the attorney work product privilege, the legislative privilege, the executive
7 privilege, the governmental deliberative-process privilege, the common-interest and
8 joint-defense privileges, and the legislative privilege. *See, e.g., Mi Familia Vota*,
9 129 F.4th at 731 ("Legislative privilege . . . generally shields legislators from
10 compulsory evidentiary process.") (citing *Lee*, 908 F.3d at 1187–88); *Am. Trucking*
11 *Ass'n, Inc.*, 14 F.4th at 87 (legislative privilege extends to governor with respect to
12 legislative acts) (citing *Bogan*, 523 U.S. at 54–55).

13 Subject to and without waiving the foregoing objections, Defendant responds
14 that, after a reasonable investigation, no analyses meeting the description of this
15 interrogatory were prepared, received, or considered by Defendant before or during
16 the drafting and adoption of the Proposition 50 Map.

17 **INTERROGATORY NO. 4:**

18 State whether, at the time the Proposition 50 Map was enacted, any state
19 official, staff member, or non-attorney consultant or contractor concluded that,
20 absent creation of the Challenged Districts, the State of California faced a
21 significant risk of liability under Section 2 of the VRA. If so, identify: (a) the
22 person(s) who reached or communicated that conclusion; (b) the date(s) on which
23 that conclusion or advice was communicated; (c) all factual bases relied on in
24 reaching that conclusion; and (d) all documents reflecting that conclusion or advice.

25 **RESPONSE TO INTERROGATORY NO. 4:**

26 Defendant incorporates by reference the objections stated above as if fully set
27 forth herein. Defendant objects that the Interrogatory is vague and confusing in
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1 referring to “consultant,” “contractor,” and “staff member.” Defendant objects to
2 the Interrogatory to the extent it seeks expert materials, including information or
3 facts that expert witnesses may locate or rely upon, outside of the framework for
4 expert disclosures. Defendant objects to the interrogatory as impermissibly
5 compound. Defendant further objects to this Interrogatory because it seeks
6 information from third parties and information not within Defendant’s possession,
7 custody, control, or personal knowledge. Defendant further objects to this
8 Interrogatory because it calls for conjecture and speculation and legal conclusions.
9 Defendant further objects that this Interrogatory is vague, ambiguous, overly broad,
10 and confusing. Defendant further objects that this Interrogatory seeks information
11 or material protected from discovery by the attorney-client privilege, the attorney
12 work product privilege, the legislative privilege, the executive privilege, the
13 deliberative-process privilege, the common-interest and joint-defense privileges,
14 and the legislative privilege. *See, e.g., Mi Familia Vota*, 129 F.4th at 731
15 (“Legislative privilege . . . generally shields legislators from compulsory
16 evidentiary process.”) (citing *Lee*, 908 F.3d at 1187–88); *Am. Trucking Ass’n, Inc.*,
17 14 F.4th at 87 (legislative privilege extends to governor with respect to legislative
18 acts) (citing *Bogan*, 523 U.S. at 54–55).

19 Subject to and without waiving the foregoing objections, and after a
20 reasonable investigation, Defendant responds that Defendant, Defendant’s
21 consultants, and Defendant’s contractors did not conclude that absent creation of
22 the Challenged Districts, the State of California faced a significant risk of liability
23 under Section 2 of the VRA. Defendant further responds that Defendant is not
24 aware that any other state official or staff member concluded that absent creation of
25 the Challenged Districts, the State of California faced a significant risk of liability
26 under Section 2 of the VRA. Defendant further responds that it is Defendant’s
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1 understanding and belief that the creation of the Challenged Districts also does not
2 violate Section 2 of the VRA.

3 **INTERROGATORY NO. 5:**

4 Identify all communications between any state official, staff member,
5 consultant, or contractor and any outside organization or individual (including but
6 not limited to Hispanas Organized for Political Equality (HOPE), the League of
7 United Latin American Citizens (LULAC), the Democratic Congressional
8 Campaign Committee (DCCC), Paul Mitchell, and Redistricting Partners) in which
9 the number or location of VRA Districts or the racial or ethnic composition of the
10 Challenged Districts was discussed, and for each such communication, identify: (a)
11 the parties to the communication; (b) the date of the communication; (c) the
12 district(s) discussed in the communication; and (d) the substance of any requests
13 regarding VRA Districts or Hispanic or Latino voting strength.

14 **RESPONSE TO INTERROGATORY NO. 5:**

15 Defendant incorporates by reference the objections stated above as if fully set
16 forth herein. Defendant further objects that the Interrogatory is vague and
17 confusing in referring to “consultant,” “contractor,” and “staff member.”
18 Defendant further objects to this Interrogatory because it seeks information from
19 third parties (Defendant is not aware of all communications between any and all
20 state officials, staff members, consultants, or contractors and outside organizations
21 or individuals) and information not within Defendant’s possession, custody,
22 control, or personal knowledge. For that reason, Defendant further objects that this
23 Interrogatory is overly broad and ambiguous. Defendant further objects to the
24 Interrogatory as impermissibly compound. Defendant further objects that this
25 Interrogatory seeks information or material protected from discovery by the
26 attorney-client privilege, the attorney work product privilege, the legislative
27 privilege, the executive privilege, the governmental deliberative-process privilege,
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1 the common-interest and joint-defense privileges, and the legislative privilege. *See*,
2 *e.g.*, *Mi Familia Vota*, 129 F.4th at 731 (“Legislative privilege . . . generally shields
3 legislators from compulsory evidentiary process.”) (citing *Lee*, 908 F.3d at 1187–
4 88); *Am. Trucking Ass’ns, Inc.*, 14 F.4th at 87 (legislative privilege extends to
5 governor with respect to legislative acts) (citing *Bogan*, 523 U.S. at 54–55).

6 Subject to and without waiving the foregoing objections, Defendant responds
7 that Defendant is not aware of any communications between Defendant, his staff
8 members, consultants, or contractors acting in their official capacities and outside
9 organizations or individuals, in which the number or location of VRA Districts or
10 the racial or ethnic composition of the Challenged Districts were discussed.

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12 Dated: December 1, 2025

Respectfully submitted,

13 ROB BONTA
14 Attorney General of California
15 ANYA M. BINSACCA
16 LARA HADDAD
17 Supervising Deputy Attorneys General
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/s/ David Green
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Governor Gavin Newsom and
Secretary of State Shirley Weber

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VERIFICATION

I, Abnner Olivares, declare:

I am employed as the Special Assistant to the Legal Affairs Secretary and am authorized to make this verification on behalf of and for the Defendant. I have made reasonable efforts to review the foregoing Defendant Governor Gavin Newsom's Response to Plaintiffs' and Plaintiff-Intervenor's Interrogatories Set One, and am familiar with its contents. Based on this review, and on information and belief, I affirm that the matters stated therein are true and correct.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 1st day of December 2025, at Sacramento, California.

/s/ 
ABNNER OLIVARES

PROOF OF SERVICE

I, David Green, hereby declare as follows:

I am employed in the Office of the Attorney General of the State of California, a member of the California State Bar, and admitted to practice before the United States District Court for the Central District of California. I am 18 years of age or older and not a party to this matter.

On December 1, 2025, I served the attached **DEFENDANTS' RESPONSE TO PLAINTIFFS' AND PLAINTIFF-INTERVENOR'S INTERROGATORIES, SET ONE** by transmitting a true copy via electronic mail to the individuals listed below, who are counsel for Plaintiffs and Plaintiff-Intervenor in this matter.

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I declare under penalty of perjury under the laws of the State of California and the United State of America that the foregoing is true and correct, and that this declaration was executed on December 1, 2025, at San Francisco, California.

/s/ David Green
David Green