

EXHIBIT 2

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and Secretary of State Shirley Weber, in their
11 official capacities*

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

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

16 Plaintiffs,

17 and

18 **UNITED STATES OF AMERICA,**

19 Plaintiff-Intervenor

20
21 v.

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

24 Defendants,

25 and

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

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

**DEFENDANT SECRETARY OF
STATE SHIRLEY WEBER'S
RESPONSE AND OBJECTIONS
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,
2 Defendant Shirley Weber, in her official capacity as Secretary of State of California
3 (Defendant), provides the following objections and responses to Plaintiffs and
4 Plaintiff-Intervenor's Interrogatories, Nos. 1–5.

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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 her. 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 to the extent that it seeks
19 information not within Defendant's knowledge or control.

20 2. Defendant objects to each Interrogatory to the extent that it seeks
21 information that is not relevant to any claim or defense at issue in this case, and to
22 the extent that any Interrogatory seeks information that is not proportional to the
23 needs of the case.

24 3. Defendant objects to each Interrogatory to the extent that it imposes
25 obligations that exceed the scope of Defendant's obligations under the Federal
26 Rules of Civil Procedure, the Local Rules of the United States District Court for the
27 Central District of California, or applicable court orders.
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1 4. Defendant objects to each Interrogatory to the extent that it is
2 duplicative, overlapping, or cumulative.

3 5. Defendant objects to each Interrogatory as unduly burdensome to the
4 extent that it seeks information already in Plaintiffs' possession, custody, or control,
5 or information that is readily accessible from publicly available or third-party
6 sources and thus equally accessible to Plaintiffs.

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

19 7. Defendant objects to each Interrogatory to the extent that it is intended
20 to limit her rights to rely on any documents, information, or witness for any purpose
21 that may result from the Interrogatory.

22 8. Defendant objects to the definition of the "Proposition 50 Map" as
23 vague, ambiguous, and confusing. Plaintiffs and Plaintiff-Intervenor (together,
24 Plaintiff) define it to mean "the map of California congressional districts that went
25 into effect following the November 4, 2025, statewide special election on Assembly
26 Constitutional Amendment 8." But as of this date, no new California congressional
27 district map has gone into effect since November 4, 2025, statewide special
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1 election.

2 9. Defendant has not completed discovery, analysis, or preparation for
3 trial in this case. Each response is true and correct to the best of Defendant's
4 knowledge as of this date, and Defendant reserves the right to provide information
5 that is subsequently discovered or not previously provided as the result of
6 oversight, inadvertence, or mistake. Defendant also reserves the right to
7 supplement the following responses to the extent necessary and appropriate.
8 Furthermore, these responses are prepared based on Defendant's good-faith
9 interpretation and understanding of each Interrogatory, and are subject to correction
10 for inadvertent errors, mistake, oversight, misinterpretation, or otherwise, and if
11 any.

12 **INTERROGATORY NO. 1:**

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

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

18 Defendant incorporates by reference the objections stated above as if fully set
19 forth herein. Defendant objects to the interrogatory to the extent that it seeks expert
20 materials, including information or facts that expert witnesses may locate or rely
21 on, outside of the framework for expert disclosures. Defendant objects to the
22 interrogatory as overly broad and impermissibly compound. Defendant further
23 objects that this Interrogatory seeks information or material not within Defendant's
24 possession, custody, or control. Defendant further objects that this Interrogatory
25 improperly seeks or requires Defendant to make a factual and/or legal
26 determination regarding the basis for the actions, decisions, or conclusions of third
27 parties. Defendant further objects that this Interrogatory seeks information or
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1 material protected from discovery by the attorney-client privilege, attorney work
2 product privilege, legislative privilege, the executive privilege, the governmental
3 deliberative-process privilege, the official-information privilege, and/or other
4 applicable privileges or protections.

5 Subject to and without waiving any of the foregoing objections, Defendant
6 responds that, after a reasonable investigation, Defendant does not have information
7 responsive to this Interrogatory.

8 **INTERROGATORY NO. 2:**

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

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

17 Defendant incorporates by reference the objections stated above as if fully set
18 forth herein. Defendant objects to the interrogatory to the extent that it seeks expert
19 materials, including information or facts that expert witnesses may locate or rely
20 on, outside of the framework for expert disclosures. Defendant objects to the
21 interrogatory as impermissibly compound. Defendant further objects that this
22 Interrogatory seeks information or material not within Defendant's possession,
23 custody, or control. Defendant further objects that this Interrogatory improperly
24 seeks or requires Defendant to make a factual and/or legal determination regarding
25 the basis for the actions, decisions, or conclusions of third parties. Defendant
26 further objects that this Interrogatory seeks information or material protected from
27 discovery by the attorney-client privilege, attorney work product privilege,
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1 legislative privilege, the executive privilege, the governmental deliberative-process
2 privilege, the official-information privilege, and/or other applicable privileges or
3 protections.

4 Subject to and without waiving any of the foregoing objections, Defendant
5 responds that, after a reasonable investigation, Defendant does not have information
6 responsive to this Interrogatory.

7 **INTERROGATORY NO. 3:**

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

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

16 Defendant incorporates by reference the objections stated above as if fully set
17 forth herein. Defendant objects to the interrogatory to the extent that it seeks expert
18 materials, including information or facts that expert witnesses may locate or rely
19 on, outside of the framework for expert disclosures. Defendant objects to the
20 interrogatory as impermissibly compound. Defendant further objects that this
21 Interrogatory seeks information or material not within Defendant's possession,
22 custody, control or personal knowledge. Defendant further objects that this
23 Interrogatory seeks information or material protected from discovery by the
24 attorney-client privilege, attorney work product privilege, legislative privilege, the
25 executive privilege, the governmental deliberative-process privilege, the official-
26 information privilege, and/or other applicable privileges or protections.

1 Subject to and without waiving any of the foregoing objections, Defendant
2 responds that, after a reasonable investigation, Defendant does not have information
3 responsive to this Interrogatory.

4 **INTERROGATORY NO. 4:**

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

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

13 Defendant incorporates by reference the objections stated above as if fully set
14 forth herein. Defendant objects to the interrogatory to the extent that it seeks expert
15 materials, including information or facts that expert witnesses may locate or rely
16 on, outside of the framework for expert disclosures. Defendant objects to the
17 interrogatory as impermissibly compound. Defendant further objects that this
18 Interrogatory seeks information or material not within Defendant's possession,
19 custody, control or personal knowledge. Defendant further objects that this
20 Interrogatory seeks information or material protected from discovery by the
21 attorney-client privilege, attorney work product privilege, legislative privilege, the
22 executive privilege, the governmental deliberative-process privilege, the official-
23 information privilege, and/or other applicable privileges or protections.

24 Subject to and without waiving any of the foregoing objections, Defendant
25 responds that, after a reasonable investigation, Defendant does not have information
26 responsive to this Interrogatory.
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1 **INTERROGATORY NO. 5:**

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

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

13 Defendant incorporates by reference the objections stated above as if fully set
14 forth herein. Defendant objects to the interrogatory as impermissibly compound.
15 Defendant further objects that this Interrogatory seeks information or material not
16 within Defendant's possession, custody, control or personal knowledge. Defendant
17 further objects that this Interrogatory seeks information or material protected from
18 discovery by the attorney-client privilege, attorney work product privilege,
19 legislative privilege, the executive privilege, the governmental deliberative-process
20 privilege, the official-information privilege, and/or other applicable privileges or
21 protections.

22 Subject to and without waiving any of the foregoing objections, Defendant
23 responds that, after a reasonable investigation, Defendant does not have information
24 responsive to this Interrogatory.
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1 Dated: December 1, 2025

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 ANYA M. BINSACCA
5 Supervising Deputy Attorney General
6 JENNIFER E. ROSENBERG
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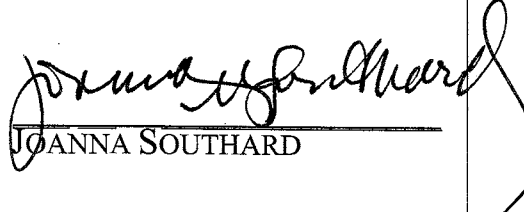
13 /s/ David Green
14 DAVID GREEN
15 Deputy Attorney General
16 *Attorneys for Defendant California*
17 *Secretary of State Shirley Weber*
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VERIFICATION

I, Joanna Southard, declare:

I am employed as the Assistant Chief of the Elections Division and am authorized to make this verification on behalf of and for the Defendant. I have made reasonable efforts to review the foregoing Defendant Secretary of State Shirley Weber'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.


JOANNA SOUTHARD

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 AND OBJECTIONS 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