

EXHIBIT 3

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

DAVID TANGIPA, *et al.*,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

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

Defendants,

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

Defendant-Intervenors.

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

**DCCC’S RESPONSES AND
OBJECTIONS TO PLAINTIFFS’
FIRST SET OF REQUESTS FOR
PRODUCTION**

DCCC’S RESPONSES AND OBJECTIONS
TO PLAINTIFFS’ FIRST SET OF REQUESTS FOR PRODUCTION

Pursuant to Federal Rule of Civil Procedure 34(b)(2), Defendant-Intervenor DCCC provides the following Responses and Objections to Plaintiffs’ First Set of Requests for Production served on November 26, 2025.

PRELIMINARY STATEMENT

Discovery is ongoing. These responses and objections are based on the information and documents currently available to DCCC following a reasonable search. DCCC reserves its rights to alter, supplement, amend, or otherwise modify these responses and objections in light of additional facts revealed through subsequent inquiry.

GENERAL OBJECTIONS
AND OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

1. DCCC objects to Plaintiffs’ instruction “A” as overly broad and unduly burdensome because it calls for DCCC to search for and produce documents dated between January 1, 2025 and the present. DCCC did not become aware of any effort to redraw California’s congressional districts until the summer of 2025, and thus, any documents dated before that time are not relevant to any party’s claim or defense. Accordingly, to the extent DCCC agrees to produce documents responsive to Plaintiffs’ Requests, DCCC will search for and produce only documents dated after July 1, 2025.

2. DCCC objects to Plaintiffs’ instruction “B” as vague and ambiguous, and overly broad and unduly burdensome, insofar as it purports to specify that Plaintiffs’ requests encompass documents possessed by DCCC’s “staff, agents, employees, representatives, and . . . attorneys” or “any other person who has possession, custody, or control of [DCCC’s] documents.” DCCC will produce only those documents that are

1 within its possession, custody, or control located after a reasonable search, and that are
2 not protected by the attorney-client privilege, the work-product protection, or any other
3 applicable privilege or immunity.

4 3. DCCC objects to Plaintiffs' definition "B" as vague and ambiguous, and
5 overly broad and unduly burdensome, including because it purports to define
6 "communication" to include "any disclosure, transfer, or exchange of information or
7 opinion, however made," which would encompass ephemeral communications such as
8 oral conversations that are not within DCCC's possession, custody, or control. DCCC
9 will produce only those documents that are within its possession, custody, or control
10 located after a reasonable search.
11

12 4. DCCC objects to the Requests to the extent that they seek documents and
13 materials protected from disclosure by the work-product doctrine, the attorney-client
14 privilege, common interest doctrine, or any other applicable privilege or immunity
15 recognized by law including, without limitation, the associational rights protected by the
16 First Amendment to the United States Constitution. The First Amendment shields a party
17 from discovery requests that would intrude upon or chill its associational rights unless
18 the other party can show a "compelling need" for the information sought. *See, e.g.,*
19 *NAACP v. Alabama*, 357 U.S. 449, 460 (1958). Furthermore, compelled disclosure of
20 internal strategy or planning documents, or communications with strategic partners
21 intrudes upon DCCC's First Amendment Rights. *See Perry v. Schwarzenegger*, 591 F.3d
22 1147, 1163 (9th Cir. 2010) (the First Amendment privilege prevents disclosure of
23 material that "would have the practical effects of discouraging political association and
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1 inhibiting internal [] communications that are essential to effective association and
2 expression” absent a “heightened” showing that the material is relevant and necessary).

3 **RESPONSES AND OBJECTIONS**

4 **Request For Production No. 1**

5 All Communications, including payments and contracts, between (1) You and Your
6 officers or agents, including but not limited [sic] Governor Gavin Newsom and all
7 Members of the California State Legislature, and (2) Paul Mitchell that Relate to
8 redistricting, Maps, or the Proposition 50 Map.

9 **DCCC’s Response**

10 DCCC incorporates its general objections as though fully set forth herein. DCCC
11 objects to this Request as vague and ambiguous, including because it appears to suggest
12 that Governor Gavin Newsom and members of the California State Legislature are agents
13 of DCCC. DCCC further objects to this Request as overly broad and unduly burdensome,
14 including because it purports to encompass all “Communications” that “Relate to
15 redistricting” in general. DCCC further objects to this Request to the extent that it calls
16 for documents that are not within DCCC’s possession, custody, or control. DCCC further
17 objects to this Request to the extent it calls for information protected by the Attorney-
18 Client Privilege, the Work-Product protection, the First Amendment privilege, or any
19 other applicable privilege or immunity.
20

21 Subject to and without waiving the foregoing objections, DCCC will produce all
22 non-privileged documents reflecting communications between DCCC and its employees,
23 on the one hand, and Paul Mitchell, on the other hand, dated after July 1, 2025, that relate
24 to California’s congressional map enacted through Prop 50. DCCC will provide a
25 privilege log describing documents it redacts or withholds on grounds of privilege.
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Request For Production No. 2

All Maps, configurations of Maps, and analyses of Maps that were received by, sent to, presented to, or created for Members of the California State Legislature from July 1, 2025, through and including August 24, 2025.

DCCC's Response

DCCC incorporates its general objections as though fully set forth herein. DCCC objects to this Request to the extent it calls for documents that are not within DCCC's possession, custody, or control, including map-related documents prepared by or transmitted to the California State Legislature or its members without any involvement by the DCCC. DCCC further objects to this Request to the extent it calls for information protected by the Attorney-Client privilege, the Work-Product protection, the First Amendment privilege, or any other applicable privilege or immunity.

Subject to and without waiving the foregoing objections, DCCC will produce a copy of the Map it transmitted to the California State Legislature in August 2025, as well as accompanying documents. DCCC has not located any other documents responsive to this Request after a reasonable search.

Request For Production No. 3

All Communications between (1) Members of the California State Legislature and (2) any other Person, including but not limited to the California Independent Redistrict Commission and its members, Relating to the effect of the Proposition 50 Map on Latinos, Black Americans, or Asian-Americans' political power, including but not limited to the forecasted ability of these groups to elect to Congress a candidate of their choice.

DCCC's Response

DCCC incorporates its general objections as though fully set forth herein. DCCC further objects to this Request as vague and ambiguous, including because it discusses the effect of Proposition 50 on the “political power” of various racial groups without defining that term. DCCC objects to this Request to the extent it calls for documents that are not within DCCC's possession, custody, or control, including communications with members of the California State Legislature in which DCCC was not involved. DCCC further objects to this Request to the extent it calls for information protected by the Attorney-Client privilege, the Work-Product protection, the First Amendment privilege, or any other applicable privilege or immunity.

Subject to and without waiving the foregoing objections, DCCC has not located any documents responsive to this Request after a reasonable search.

Request For Production No. 4

Any drafts of or Communications Relating to the Office of the Speaker of the Assembly's press release entitled Speaker Rivas Joins California, Texas Democrats to Fight Back Against Trump's Redistricting Power Grab, published on August 9, 2025, available at <https://speaker.asmdc.org/press-releases/20250809-speaker-rivas-joins-california-texas-democrats-fight-back-against-trumps>.

DCCC's Response

DCCC has not located any documents responsive to this Request after a reasonable search.

Request For Production No. 5

Any Documents input into or generated by the computer software program(s) used to draw the new map that Relate to the Proposition 50 Map or any other Map drawn by You or produced and sent to You by Your agents, employees, consultants, contractors, or any other Person from July 1, 2025, through and including August 24, 2025.

DCCC's Response

DCCC incorporates its general objections as though fully set forth herein. DCCC further objects to this Request as vague and ambiguous, including because it does not specify the process by which a document would be "input into or generated by" a "computer software program" in the course of drawing a proposed congressional map, and because it does not define "the new map." DCCC further objects to this Request to the extent it calls for information protected by the Attorney-Client Privilege, the Work-Product protection, the First Amendment privilege, or any other applicable privilege or immunity.

Subject to and without waiving the foregoing objections, DCCC states that after a reasonable search it has located only privileged documents responsive to this request. DCCC will provide a privilege log describing documents it withholds on grounds of privilege.

1 Dated: December 1, 2025

Respectfully submitted,

2 /s/ Lalitha D. Madduri

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 1, 2025, I electronically served the foregoing document via electronic mail on all counsel of record.

Dated: December 1, 2025

/s/ Lalitha D. Madduri
Lalitha D. Madduri