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

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF CALIFORNIA; GAVIN NEWSOM, Governor of California, in his official capacity; ROBERT BONTA, Attorney General of California, in his official capacity,

Defendants.

2:25-cv-10999-CAS-AJR

JOINT STIPULATION RE: PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION AND RELATED ISSUES

Judge: The Honorable Christina A. Snyder
Trial Date: None Designated
Action Filed: November 17, 2025

JOINT STIPULATION

1
2 Plaintiff the United States of America and Defendants the State of California,
3 Rob Bonta, in his official capacity as Attorney General of the State of California,
4 Gavin Newsom, in his official capacity as Governor of the State of California, by
5 and through their counsel, agree and stipulate to the following:

6 1. On November 17, 2025, Plaintiff filed a complaint against Defendants.
7 The complaint challenges sections 2 and 3 of Senate Bill 627 (2025-26 Reg.
8 Session) and sections 2 and 10 of Senate Bill 805 (2025-26 Reg. Session) (together,
9 “Challenged Provisions”), which are applicable to federal law enforcement officers
10 and will become effective on January 1, 2026.

11 2. Defendants were served with Plaintiff’s complaint and summons on
12 November 24, 2025.

13 3. The deadline for Defendants to respond to Plaintiff’s complaint is
14 December 15, 2025. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

15 4. On November 25, 2025, Plaintiff filed a motion for a preliminary
16 injunction. *See* ECF No. 11. To allow time for disposition of that motion before
17 the Challenged Provisions take effect on January 1, 2026, Plaintiff noticed its
18 motion for a hearing on December 22, 2025. *Id.* at 1.

19 5. On November 26, 2025, the Court, sua sponte, issued a scheduling order
20 continuing the hearing on Plaintiff’s motion for a preliminary injunction until
21 January 12, 2026. *See* ECF No. 13.

22 6. Under local rule 7-10, Plaintiff’s deadline to file its reply in support of its
23 preliminary injunction motion is December 29, 2025.

24 7. On November 25, 2025, Plaintiff informed Defendants of its intent to
25 move for a temporary restraining order seeking to stay enforcement of the
26 Challenged Provisions until Plaintiff’s motion for a preliminary injunction is
27 resolved, unless Defendants agreed to stay enforcement of the Challenged
28

1 Provisions in the interim.

2 8. To promote the orderly presentation of issues and conserve Court
3 resources, the parties hereby stipulate:

4 a. Defendants the State of California, Governor Newsom, and
5 Attorney General Bonta agree that neither they; nor their officers, agents, servants,
6 employees, attorneys, and other persons who are in active concert or participation
7 with them; will enforce, or take any action to enforce, the Challenged Provisions
8 against federal law enforcement agencies or officers, until such time as the court
9 rules on Plaintiff's motion for a preliminary injunction set for hearing on January
10 12. This agreement is made subject to and without waiving any argument that any
11 defendant is an improper party to this action.

12 b. Defendants' deadline to respond to Plaintiff's complaint is
13 continued until after the Court rules on Plaintiff's motion for a preliminary
14 injunction. Within twenty-one (21) days after that ruling, the parties agree to confer
15 and file a proposed schedule for further proceedings, including the deadline for any
16 responsive pleading.

17 9. The parties further stipulate: Due to pre-scheduled leave of Government
18 counsel and end-of-year holidays, Plaintiff's deadline to file its reply in support of
19 its preliminary injunction motion is January 5, 2026.

20 10. The parties agree that this stipulation will only be effective if the Court
21 enters an order based on this stipulation, and that neither party is waiving any
22 substantive claim or argument by entering into this stipulation.

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24 **IT IS SO STIPULATED**

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Dated: December 8, 2025

/s/ Elisabeth J. Neylan
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Dated: December 8, 2025

/s/ Asha Albuquerque
ASHA ALBUQUERQUE
Deputy Attorneys General
Attorneys for Defendants

Attestation

I, Asha Albuquerque, hereby attest that all signatories listed have concurred in this joint stipulation's content and have authorized this filing.

/s/ Asha Albuquerque
Asha Albuquerque