

1 SPENCER E. AMDUR (SBN 320069)  
 2 CODY H. WOFSY (SBN 294179)  
 3 AMERICAN CIVIL LIBERTIES UNION  
 FOUNDATION  
 39 Drumm Street  
 San Francisco, CA 94111  
 4 Tel: (415) 343-0770  
 Fax: (415) 395-0950  
 5 Email: samdur@aclu.org  
 cwofsy@aclu.org

JULIA HARUMI MASS (SBN 189649)  
 ANGÉLICA H. SALCEDA (SBN 296152)  
 ACLU FOUNDATION OF NORTHERN  
 CALIFORNIA  
 39 Drumm Street  
 San Francisco, CA 94111  
 Tel: (415) 621-2493  
 Fax: (415) 255-8437  
 Email: jmass@aclunc.org  
 asalceda@aclunc.org

6 JESSICA KARP BANSAL (SBN 277347)  
 7 NATIONAL DAY LABORER  
 ORGANIZING NETWORK  
 8 674 S. La Fayette Park Place  
 Los Angeles, CA 90057  
 9 Tel: (213) 380-2214  
 Fax: (213) 380-2787  
 10 Email: jbanksal@ndlon.org

MICHAEL KAUFMAN (SBN 254575)  
 JENNIFER PASQUARELLA (SBN 263241)  
 ACLU FOUNDATION OF SOUTHERN  
 CALIFORNIA  
 1313 West 8th Street  
 Los Angeles, CA 90017  
 Tel: (213) 977-5232  
 Fax: (213) 977-5297  
 Email: mkaufman@clusocal.org  
 jpasquarella@clusocal.org

11 *Attorneys for Intervenor-Defendants*  
 12 *Additional counsel on next page*

14 IN THE UNITED STATES DISTRICT COURT  
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 THE UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 THE STATE OF CALIFORNIA; EDMUND  
 20 GERALD BROWN JR., Governor of  
 California, in his official capacity; and  
 21 XAVIER BECERRA, Attorney General of  
 California, in his official capacity,

22 Defendants.  
 23

Case No. 2:18-cv-00490-JAM-KJN

Hon. John A. Mendez

**NOTICE OF MOTION AND  
 MOTION TO INTERVENE OF THE  
 CALIFORNIA PARTNERSHIP TO  
 END DOMESTIC VIOLENCE AND  
 THE COALITION FOR HUMANE  
 IMMIGRANT RIGHTS**

24  
 25  
 26  
 27  
 28

1 OMAR C. JADWAT\*  
LEE GELERNT\*  
2 MAHRAH TAUFIQUE\*  
AMERICAN CIVIL LIBERTIES UNION  
3 FOUNDATION  
125 Broad St., 18th Floor  
4 New York, NY 10004  
Tel: (212) 549-2660  
5 Fax: (212) 549-2654  
Email: ojadwat@aclu.org  
6 lgelernt@aclu.org  
irp\_mt@aclu.org

7  
8 ANGELA CHAN (SBN 250138)  
ASIAN AMERICANS ADVANCING JUSTICE -  
9 ASIAN LAW CAUCUS  
55 Columbus Avenue  
10 San Francisco, CA 94404  
Tel: (415) 848-7719  
11 Fax: (415) 896-1702  
Email: angelac@advancingjustice-alc.org  
12

13 BARDIS VAKILI (SBN 247783)  
ACLU FOUNDATION OF SAN DIEGO &  
14 IMPERIAL COUNTIES  
P.O. Box 87131  
15 San Diego, CA 92138-7131  
Tel: (619) 398-4485  
16 Email: bvakili@aclusandiego.org  
17

18 *\*pro hac vice application forthcoming*  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Please take notice that on June 5, 2018, at 1:30 p.m., or as soon thereafter as the matter  
2 may be heard, Proposed Intervenor-Defendants the California Partnership to End Domestic  
3 Violence and the Coalition for Humane Immigrant Rights will move this Court for an order  
4 granting them intervention as defendants in this case under Federal Rule of Civil Procedure 24.  
5

6 This Motion to Intervene is based on the attached Memorandum in Support of Motion to  
7 Intervene, proposed Opposition to the Motion for Preliminary Injunction, proposed Motion to  
8 Dismiss, Declaration of Kathy Moore, Declaration of Angelica Salas, and all other documents  
9 filed in this case.  
10

11 Dated: May 4, 2018

Respectfully submitted,

12  
13 Julia Harumi Mass (SBN 189649)  
14 Angelica H. Salceda (SBN 296152)  
15 ACLU FOUNDATION OF NORTHERN  
16 CALIFORNIA  
17 39 Drumm Street  
18 San Francisco, CA 94111  
19 (415) 621-2493  
20 jmass@aclunc.org  
21 asalceda@aclunc.org

/s/ Spencer E. Amdur  
Spencer E. Amdur (SBN 320069)  
Cody H. Wofsy (SBN 294179)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
39 Drumm Street  
San Francisco, CA 94111  
(415) 343-0770  
samdur@aclu.org  
cwofsy@aclu.org

22 Jessica Karp Bansal (SBN 277347)  
23 NATIONAL DAY LABORER  
24 ORGANIZING NETWORK  
25 674 S. La Fayette Park Place  
26 Los Angeles, CA 90057  
27 (213) 380-2214  
28 jkbansal@ndlon.org

Michael Kaufman (SBN 254575)  
Jennifer Pasquarella (SBN 263241)  
ACLU FOUNDATION OF SOUTHERN  
CALIFORNIA  
1313 West 8th Street  
Los Angeles, CA 90017  
(213) 977-5232  
mkaufman@aclusocal.org  
jpasquarella@aclusocal.org

Angela Chan (SBN 250138)  
ASIAN AMERICANS ADVANCING  
JUSTICE -  
ASIAN LAW CAUCUS  
55 Columbus Avenue  
San Francisco, CA 94404  
(415) 848-7719  
angelac@advancingjustice-alc.org

Omar C. Jadwat\*  
Lee Gelernt\*  
Mahrah Taufique\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
(212) 549-2660

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Bardis Vakili (SBN 247783)  
ACLU FOUNDATION OF SAN DIEGO  
& IMPERIAL COUNTIES  
P.O. Box 87131  
San Diego, CA 92138-7131  
(619) 398-4485  
bvakili@aclusandiego.org

ojadwat@aclu.org  
lgelermt@aclu.org  
irp\_mt@aclu.org

*Counsel for Intervenor-Defendants*  
*\*pro hac vice application forthcoming*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2018, I electronically filed the foregoing Motion to Intervene and attachments thereto with the Clerk for the United States District Court for the Eastern District of California by using the CM/ECF system. A true and correct copy of this brief has been served via the Court's CM/ECF system on all counsel of record.

/s/ Spencer E. Amdur

Spencer E. Amdur  
Dated: May 4, 2018