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(Additional counsel listed on next page)

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

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA,  
CALIFORNIA CHAMBER OF  
COMMERCE, AMERICAN FARM  
BUREAU FEDERATION, LOS  
ANGELES COUNTY BUSINESS  
FEDERATION, CENTRAL VALLEY  
BUSINESS FEDERATION, and  
WESTERN GROWERS ASSOCIATION,

Plaintiffs,

v.

LIANE M. RANDOLPH, in her official  
capacity as Chair of the California Air  
Resources Board, STEVEN S. CLIFF, in  
his official capacity as the Executive  
Officer of the California Air Resources  
Board, and ROBERT A. BONTA, in his  
official capacity as Attorney General of  
California.

Defendants.

CASE NO. 2:24-cv-00801-ODW-PVC  
**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
INJUNCTION PENDING APPEAL**

**Ruling Requested by  
September 15, 2025**

**HEARING:**

Date: September 8, 2025  
Time: 1:30 PM  
Location: Courtroom 5D  
Judge: Otis D. Wright II

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29 *Attorneys for Plaintiff Chamber of Commerce of the United States of America*

1 **TO THE HONORABLE OTIS D. WRIGHT II, UNITED STATES DISTRICT**  
2 **JUDGE, AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that on September 8, 2025 at 1:30 PM, or as soon  
4 thereafter as may be heard by the Court, before the Honorable Otis D. Wright II, United  
5 States District Judge, in Courtroom 5D of the First Street Courthouse, 350 W. 1st Street,  
6 Los Angeles, California 90012, Plaintiffs Chamber of Commerce of the United States  
7 of America, California Chamber of Commerce, American Farm Bureau Federation, Los  
8 Angeles County Business Federation, Central Valley Business Federation, and Western  
9 Growers Association will, and hereby do, move pursuant to Federal Rule of Civil Pro-  
10 cedure 62(d) and Federal Rule of Appellate Procedure 8(a)(1)(C) for an injunction pend-  
11 ing appeal of the Court's order denying their motion for a preliminary injunction barring  
12 defendants from implementing, applying, or taking any action to enforce Senate Bills  
13 253 and 261. Plaintiffs are entitled to interim relief because they face imminent and  
14 irreparable First Amendment harm from compelled speech under SB 253 and SB 261,  
15 and have raised serious constitutional questions warranting appellate review before the  
16 laws take effect. Plaintiffs respectfully request a ruling on this motion by **September**  
17 **15, 2025**, so that Plaintiffs may promptly seek relief from the Ninth Circuit if this Court  
18 declines to grant an injunction pending appeal.

19 This Motion is based on this Notice of Motion and Motion for Injunction Pending  
20 Appeal; the accompanying Memorandum of Points and Authorities; all pleadings, rec-  
21 ords, and files in this action; all matters of which judicial notice may or shall be taken;  
22 and any other oral or written evidence or argument that the Court may consider.

23 This Motion is made following the conference between counsel for Plaintiffs and  
24 Defendants, pursuant to Central District Local Rule 7-3, which took place on August 15,  
25 2025.

1 DATED: August 20, 2025

2 Respectfully submitted,

3 GIBSON, DUNN & CRUTCHER LLP

4 By: /s/ Bradley J. Hamburger

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