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*Attorneys for Intervener-Defendants*  
CALIFORNIA INDEPENDENT  
VOTER PROJECT, DAVID  
TAKASHIMA, ABEL MALDONADO  
& CALIFORNIANS TO DEFEND  
THE OPEN PRIMARY

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

MICHAEL CHAMNESS,  
  
*Plaintiff,*  
  
vs.  
  
DEBRA BOWEN, California Secretary of  
State, *et al.,*  
  
*Defendants,*  
  
CALIFORNIA INDEPENDENT VOTER  
PROJECT, DAVID TAKASHIMA, ABEL  
MALDONADO & CALIFORNIANS TO  
DEFEND THE OPEN PRIMARY,  
  
*Proposed Intervener-Defendants.*

Case #11-cv-01479-ODW (FFMx)

**NOTICE OF PROVISIONAL  
SUBMISSION OF  
INTERVENERS'  
OPPOSITION TO  
PLAINTIFF'S MOTION  
FOR PRELIMINARY  
INJUNCTION**

JUDGE: Hon. Otis D. Wright II  
COURTROOM: 11  
HEARING DATE: March 21, 2011  
HEARING TIME: 1:30 p.m.

1 On March 1, 2011, the CALIFORNIA INDEPENDENT VOTER PROJECT,  
2 DAVID TAKASHIMA, ABEL MALDONADO & CALIFORNIANS TO DEFEND THE  
3 OPEN PRIMARY moved to intervene in this action as defendants. See Ex Parte  
4 Application to Intervene on Shortened Time (Dkt. #25). In part, the purpose of  
5 seeking intervention—and the purpose of seeking intervention by ex parte  
6 application—was to oppose Plaintiff’s pending motion for preliminary injunction,  
7 set for hearing on March 21, 2011.

8 The deadline for all defendants to file papers opposing the motion for  
9 preliminary injunction is this date, March 4, 2011. See Order on Defendant’s Ex  
10 Parte Application to Extend Time to File Briefs Re Motion for Preliminary  
11 Injunction (Dkt. #9), p. 2.

12 As the Court has not yet ruled upon Interveners-Applicants’ ex parte  
13 application, and in the expectation that the motion to intervene will be granted,  
14 Intervener-Applicants provisionally submit the accompanying opposition to the  
15 motion for preliminary injunction, along with a request for judicial notice and the  
16 nongovernmental corporate disclosure statement required by Federal Rule of Civil  
17 Procedure 7.1 and Local Rule (C.D. Cal.) 7.1-1.

18  
19 Dated: March 4, 2011

Respectfully submitted,  
NIELSEN MERKSAMER  
PARRINELLO GROSS & LEONI LLP

By: /s/ Marguerite Mary Leoni  
Marguerite Mary Leoni

By: /s/ Christopher E. Skinnell  
Christopher E. Skinnell

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THE OPEN PRIMARY

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