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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Pedro VASQUEZ PERDOMO; Carlos  
Alexander OSORTO; and Isaac  
VILLEGAS MOLINA; Jorge  
HERNANDEZ VIRAMONTES; Jason  
Brian GAVIDIA; LOS ANGELES  
WORKER CENTER NETWORK;  
UNITED FARM WORKERS;  
COALITION FOR HUMANE  
IMMIGRANT RIGHTS; IMMIGRANT  
DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as  
Secretary, Department of Homeland  
Security; Todd M. LYONS, in his  
official capacity as Acting Director,  
U.S. Immigration and Customs  
Enforcement; Rodney S. SCOTT, in his  
official capacity as Commissioner, U.S.  
Customs and Border Patrol; Michael W.  
BANKS, in his official capacity as  
Chief of U.S. Border Patrol; Kash  
PATEL, in his official capacity as  
Director, Federal Bureau of  
Investigation; Pam BONDI, in her  
official capacity as U.S. Attorney  
General; Ernesto SANTACRUZ JR., in  
his official capacity as Acting Field  
Office Director for Los Angeles, U.S.  
Immigration and Customs Enforcement;  
Eddy WANG, Special Agent in Charge  
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Akil DAVIS, in his official capacity as  
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Angeles Office, Federal Bureau of  
Investigation; Bilal A. ESSAYLI, in his  
official capacity as U.S. Attorney for  
the Central District of California,

Defendants.

Case No.: 2:25-cv-05605-MEMF-SP

**NOTICE OF MOTION AND  
MOTION TO INTERVENE;  
MEMORANDUM OF POINTS AND  
AUTHORITIES**

[Filed Concurrently: Declaration of E.  
Martin Estrada; [Proposed] Order]

Hearing Date: August 21, 2025  
Hearing Time: 10:00 am

Judge: Hon. Maame Ewusi-Mensah  
Frimpong

**NOTICE OF MOTION**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that, on August 21, 2025, at 10:00 am, or as soon thereafter as the matter may be heard in the First Street Courthouse, located at 350 West First Street, Courtroom 8B, Los Angeles, California, 90012, before the Honorable Maame Ewusi-Mensah Frimpong, Plaintiffs-Intervenors (“Intervenors”) the City of Los Angeles, the County of Los Angeles, the City of Culver City, the City of Montebello, the City of Monterey Park, the City of Pasadena, the City of Pico Rivera, the City of Santa Monica, and the City of West Hollywood will apply to the Court for leave to intervene in the above-captioned lawsuit as a matter of right in accordance with Federal Rule of Civil Procedure 24(a)(2), or in the alternative, for an order allowing permissive intervention under Federal Rule of Civil Procedure 24(b)(1)(B) (the “Motion”).

Intervenors are entitled to intervene as of right under Rule 24(a)(2) because (1) this Motion is timely, (2) Intervenors have a significantly protectable interest in this action, (3) the disposition of this action will as a practical matter impair or impede Intervenors’ ability to protect that interest, and (4) Intervenors’ interest may be inadequately represented by the other parties.

Permissive intervention also is warranted under Rule 24(b)(1)(B) because (1) Intervenors have an independent basis for jurisdiction, (2) Intervenors’ Motion is timely, and (3) Plaintiffs’ and Intervenors’ claims share common questions of law or fact.

This Motion is based upon this Notice of Motion and Motion; the supporting Memorandum of Points and Authorities; the concurrently filed declaration of E. Martin Estrada (“Estrada Decl.”); all documents and pleadings on file in this action; and such other oral and documentary evidence and hearing as the Court may consider prior to or at the hearing on this Motion.

1 Because this Motion is being made “in connection with” Plaintiffs’  
2 application under Fed. R. Civ. P. 65 for a temporary restraining order, the general  
3 meet-and-confer requirements set forth in Civil Local Rule 7-3 do not apply. *See*  
4 Civ. L. R. 7-3 (exempting motions made “in connection with . . . applications under  
5 F. R. Civ. P. 65 for temporary restraining orders” from meet-and-confer  
6 requirements). Counsel for Intervenors nevertheless met and conferred with counsel  
7 for all parties as soon as practicable before filing this Motion. On July 8, 2025,  
8 Counsel for Intervenors met and conferred with counsel for Defendants regarding  
9 this Motion. Estrada Decl. ¶ 20. Defendants indicated that they were unable to take  
10 a position on the Motion at this time. *Id.* Counsel for Intervenors also conferred  
11 with Plaintiffs’ counsel on July 7 regarding the date and substance of this Motion.  
12 *Id.* Plaintiffs do not oppose this Motion. *Id.*

13 Intervenors respectfully request that the Court grant this Motion and allow  
14 Intervenors to submit their proposed Complaint in Intervention, attached hereto as  
15 **Exhibit A.**

1 DATED: July 8, 2025

Respectfully submitted,

2  
3 By: /s/ E. Martin Estrada

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Plaintiffs-Intervenors (“Intervenors”) the City of Los Angeles, the County of Los Angeles, the City of Culver City, the City of Montebello, the City of Monterey Park, the City of Pasadena, the City of Pico Rivera, the City of Santa Monica, and the City of West Hollywood have endured weeks of disruption, chaos, and financial harm as a direct result of the activities detailed in Plaintiffs’ Lead Complaint and in the Proposed Complaint in Intervention filed concurrently with this Motion.

Armed and masked individuals, purporting to be federal agents, have conducted unprecedented and unconstitutional searches and seizures across the Southland. As a direct result, Intervenors have been forced to divert critical law enforcement resources to respond to and address the unlawful activities and manage the subsequent fallout. Moreover, because these federal agents often remain anonymous, residents regularly confuse them for local law enforcement, thus eroding the trust that local law enforcement agencies have spent decades building with local communities. And Intervenors have lost important tax revenues as local business owners shutter their stores and fearful residents remain in their homes.

Intervenors have a clear and direct interest in stopping these unlawful federal immigration actions, actions that are entirely unlike the lawful immigration enforcement that has occurred in Intervenors’ municipalities for decades. These raids pose a grave threat to Intervenors’ residents, operations, and ability to enforce the law.

Intervenors share Plaintiffs’ interest in stopping Defendants’ unconstitutional actions, but Intervenors also seek to protect their distinct municipal interests in maintaining law and order and preserving essential business tax revenue for the benefit of all their residents. Intervenors are uniquely positioned to represent their own municipal interests in this lawsuit, something Plaintiffs are not able to do. Moreover, their intervention causes no prejudice to the existing parties. Thus,

Intervenors are entitled to intervene as a matter of right under Federal Rule of Civil Procedure 24(a)(2).

Alternatively, Intervenors' claims clearly share common questions of law and fact with Plaintiffs' Lead Complaint, warranting permissive intervention under Federal Rule of Civil Procedure 24(b)(1)(B).

## **II. BACKGROUND**

### **A. Federal Raids in the City of Los Angeles and Surrounding Areas**

In recent weeks, the world has watched Los Angeles and neighboring communities as masked federal agents have carried out unlawful, and increasingly aggressive, immigration raids, resulting in unconstitutional arrests and detention of people without probable cause to believe the individuals are in violation of any immigration law, and without probable cause to believe the individuals pose a flight risk. Oftentimes the only basis for detention or arrest is the individual's skin color.

These unlawful raids and systematic detentions and arrests have sparked terror and fear throughout the City of Los Angeles and neighboring communities. The agents "show up without uniforms. They show up completely masked. They refuse to give ID." Estrada Decl. Ex. A (Transcript of June 20, 2025 Press Conference of Los Angeles Mayor Karen Bass). Defendants launch these raids without notice to, or coordination with, local law enforcement. This illegal activity has forced Intervenors to devote critical resources to determine whether armed action taken against local residents is part of a federal raid—or part of a crime. Estrada Decl. Ex. B (Nathan Solis and Richard Winton, *'Who are these people?'* *Masked immigration agents challenge local police, sow fear in L.A.*, Los Angeles Times (June 24, 2025)); *id.* Ex. C at 5 (Alex Stone, *Los Angeles police responded to a kidnapping call. But instead found an ICE operation*, ABC News (June 26, 2025)) (local law enforcement expending resources to investigate a federal immigration arrest as a kidnapping and another as a hit and run); *id.* Ex. D (Angelique Brenes,

1 *ICE agents detain mother in Pasadena in front of children without showing a*  
2 *warrant, KTLA 5 (June 28, 2025)).*

3 These unlawful raids, detentions and arrests cause irreparable harm to  
4 Intervenor and their residents, and must be stopped.

5 **B. The Impact of Defendants’ Unconstitutional and Unprecedented**  
6 **Conduct on Intervenor**

7 Defendants’ unwarranted and unlawful actions have severely impacted the  
8 ordinary functioning of Los Angeles communities, with serious consequences for  
9 local businesses and Intervenor’s tax base. These unconstitutional raids and related  
10 activities also have impaired Intervenor’s ability to protect their residents through  
11 the most basic law enforcement. Intervenor thus have a clear and direct interest in  
12 the issues and in the relief sought in Plaintiffs’ Lead Complaint.

13 *First*, Defendants’ illegal activities have disrupted Intervenor’s operations,  
14 including vital law enforcement services. Defendants’ “immigration enforcement”  
15 conduct is nothing at all like ordinary immigration actions. Raids are conducted  
16 without warrants, and residents are detained and arrested without any probable  
17 cause. Local law enforcement is therefore left to “deal with the aftermath” of raids,  
18 “including protests and questions from residents about what exactly happened.”  
19 Estrada Decl. Ex. B. In addition, the relationships that Intervenor and local law  
20 enforcement agencies have built with local communities, including immigrant  
21 communities, have been directly undercut by these unlawful raids, especially when  
22 impacted residents confuse the unlawful conduct of Defendants’ agents with  
23 conduct of local police officers. *See, e.g.*, Estrada Decl. Ex. B. at 6 (describing how  
24 “[o]fficers investigating a recent burglary were mistaken for federal immigration  
25 agents” in Los Angeles). And state prosecutors have reported “having to drop  
26 cases” because undocumented immigrant witnesses are afraid to appear in state  
27 criminal court, which Defendants are using as staging grounds for federal  
28

1 immigration enforcement. *Id.* Ex. E at 2 (James Queally, *ICE Arrests at L.A.*  
2 *Courthouse Met with Alarm*, Los Angeles Times (June 25, 2025)).

3 This appears to be exactly what Defendants intended. The President  
4 announced on his social media platform that he was calling on federal immigration  
5 officials “to do all in their power” to effect “the single largest Mass Deportation  
6 Program in History” in “Democratic Power Center[s]” “such as Los Angeles.” *Id.*  
7 Ex. F (Camilo Montoya-Galvez, *Trump Directs Immigration Authorities to*  
8 *Prioritize Deportations in Democratic-Run Cities*, CBS News (June 16, 2025)). As  
9 DHS Secretary Kristi Noem has made clear, the purpose of these raids is to disrupt  
10 the ordinary functioning of the City of Los Angeles: “We are not going away. We  
11 are staying here to liberate this city from the socialist and burdensome leadership  
12 that this Governor Newsom and this [M]ayor [Bass] placed on this country and what  
13 they have tried to insert into this city.” *Id.* Ex. G (Helen Jeong, *Kristi Noem blames*  
14 *Democratic officials for making ICE raids in LA harder*, NBC Los Angeles (June  
15 12, 2025)).

16 *Second*, these unlawful federal activities are harming Intervenor’s tax  
17 revenue. Defendants’ unconstitutional activity has hindered local businesses, as  
18 customers and business owners—including U.S. citizens—choose to stay home out  
19 of fear of being chased, detained or even arrested, simply because of the color of  
20 their skin. *See, e.g., id.* Ex. H (Brittney Mejia and Rachel Uranga, *Raid at a Home*  
21 *Depot in Hollywood shatters an immigrant refuge*, Los Angeles Times (June 20,  
22 2025)); *id.* Ex. I (Jesus Jiménez et al., ‘*Completely Disrupted*’: *Fear Upends Life for*  
23 *Latinos in L.A.*, New York Times (June 30, 2025) (“Many people are afraid of  
24 getting taken . . . for simply walking outside their house.”)).

25 The federal government’s de facto lockdown of parts of the Los Angeles  
26 region has badly harmed businesses. As Los Angeles Mayor Karen Bass has  
27 explained, “[w]orkers . . . are too afraid to come into work, and customers . . . feel  
28 they can’t go outside of their house.” *Id.* Ex. A. Businesses are therefore “empty”



1 and business owners are “suffering” and “describing the situation as worse than  
2 COVID.” *Id.* Intervenor, in turn, lose important tax revenue from those  
3 businesses.

4 **C. Plaintiffs’ Claims**

5 On June 20, 2025, Plaintiffs filed a lawsuit challenging Defendants’ unlawful  
6 immigration raids (the “Lead Action”). Plaintiffs filed their original Petition for a  
7 Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief on June  
8 20. ECF No. 1. On July 2, Plaintiffs then filed their First Amended Petition and  
9 Complaint. ECF No. 16 (the “Lead Complaint”). In the Lead Complaint, Plaintiffs  
10 seek declaratory, injunctive, and monetary relief for numerous constitutional  
11 violations.

12 *First*, Plaintiffs allege that Defendants violated the Fourth Amendment and  
13 federal regulations by conducting warrantless arrests of individuals without probable  
14 cause that the individuals are in violation of any immigration law, and with no  
15 reasonable suspicion the individuals pose a flight risk. Plaintiffs allege Defendants  
16 do so without identifying themselves as immigration officers and without  
17 explanation for the detention or arrest. *See* Lead Complaint ¶¶ 64–69, 215–233.

18 *Second*, Plaintiffs allege that Defendants have denied them access to counsel  
19 and subjected them to inhumane conditions of confinement in violation of the Fifth  
20 Amendment’s Due Process Clause and Federal regulations. *Id.* ¶¶ 73–95, 234–247.  
21 Plaintiffs also allege that Defendants have coerced voluntary departure agreements  
22 from individuals in federal custody without giving them access to counsel, and  
23 without securing a knowing and voluntary waiver of their right to a hearing, in  
24 violation of the Fifth Amendment. *See id.* ¶ 94.

25 **III. ARGUMENT**

26 Intervention in a federal action is governed by Federal Rule of Civil  
27 Procedure 24. A party may intervene as of right under Rule 24(a), or permissively  
28 under Rule 24(b). In determining whether the requirements for intervention are met,



1 the Court must accept as true all nonconclusory allegations submitted in support of  
2 the motion to intervene. *Sw. Ctr. for Biological Diversity v. Berg*, 268 F.3d 810,  
3 820 (9th Cir. 2001).

4 Intervenorors meet the requirements for both intervention as of right under Rule  
5 24(a) and permissive intervention under Rule 24(b).

6 **A. Intervenorors are Entitled to Intervene as of Right**

7 Rule 24(a)(1) permits an applicant to intervene as of right based on a “four-  
8 part test”: (1) the motion must be timely; (2) the applicant must claim a  
9 “significantly protectable interest” in the action; (3) the “disposition of the action  
10 must as a practical matter impair or impede the applicant’s ability to protect that  
11 interest”; and (4) the “applicant’s interest may be inadequately represented by the  
12 other parties.” *Allied Concrete & Supply Co. v. Baker*, 904 F.3d 1053, 1067 (9th  
13 Cir. 2018); Fed. R. Civ. P. 24(a)(1). If the applicant makes the required showing,  
14 the court must grant the motion to intervene. Fed. R. Civ. P. 24(a).

15 Courts assessing a motion to intervene as of right generally construe the Rule  
16 “broadly in favor of [the] proposed intervenors.” *United States v. City of Los*  
17 *Angeles*, 288 F.3d 391, 397 (9th Cir. 2002) (citing *United States ex rel. McGough v.*  
18 *Covington Techs. Co.*, 967 F.2d 1391, 1394 (9th Cir. 1992)); *Berg*, 268 F.3d at 818  
19 (courts “construe Rule 24(a) liberally in favor of potential intervenors”); *Arakaki v.*  
20 *Cayetano*, 324 F.3d 1078, 1083 (9th Cir. 2003) (Rule 24 “traditionally receives  
21 liberal construction in favor of applicants for intervention”). This is because a  
22 “liberal policy in favor of intervention serves both efficient resolution of issues and  
23 broadened access to the courts.” *City of Los Angeles*, 288 F.3d at 397–98 (quotation  
24 omitted).

25 Under these well-established guidelines, Intervenorors are entitled to intervene  
26 as of right under Rule 24(a)(1).

1                   **1.     This Motion to Intervene Is Timely**

2           Whether a motion to intervene is timely is determined by three factors: (1) the  
3 stage of the proceedings; (2) prejudice to other parties; and (3) the reason for and  
4 length of any delay. *United States v. Alisal Water Corp.*, 370 F.3d 915, 921–23 (9th  
5 Cir. 2004).

6           Intervenors are filing this motion to intervene just three court days after  
7 Plaintiffs filed their Lead Complaint. *See* Lead Complaint (filed July 2, 2025).  
8 Because Intervenors filed their Motion “at an early stage of the proceedings,” the  
9 parties will suffer no prejudice “from the grant of intervention at that early stage,”  
10 and “intervention [will] not cause disruption or delay in the proceedings.” *Citizens*  
11 *for Balanced Use v. Mont. Wilderness Ass’n*, 647 F.3d 893, 897 (9th Cir. 2011)  
12 (motion to intervene filed “less than three months after the complaint was filed” was  
13 timely). Thus, Intervenors’ motion is timely.

14                   **2.     Intervenors Have a Significant Protectable Interest in This**  
15                   **Action**

16           Intervenors have a “significant protectable interest” in this lawsuit sufficient  
17 to merit intervention. *City of Los Angeles*, 288 F.3d at 397 (quotation omitted).

18           As the Ninth Circuit recognized: “An applicant has a ‘significant protectable  
19 interest’ in an action if (1) it asserts an interest that is protected under some law, and  
20 (2) there is a ‘relationship’ between its legally protected interest and the plaintiff’s  
21 claims.” *Id.* at 398. The relationship requirement is met “if the resolution of the  
22 plaintiff’s claims actually will affect the applicant.” *Id.* Importantly, “[t]he  
23 ‘interest’ test is not a clear-cut or bright-line rule, because [n]o specific legal or  
24 equitable interest need be established.” *Id.* (quotation omitted); *see Greene v.*  
25 *United States*, 996 F.2d 973, 976 (9th Cir. 1993) (same). Instead, “the ‘interest’ test  
26 directs courts to make a practical, threshold inquiry, and is primarily a practical  
27 guide to disposing of lawsuits by involving as many apparently concerned persons  
28

1 as is compatible with efficiency and due process.” *City of Los Angeles*, 288 F.3d at  
2 398 (quotation omitted). Intervenor’s meet those requirements here.

3 (a) *The City of Los Angeles Has a Significantly Protectable*  
4 *Interest in the Lead Action*

5 Defendants’ ongoing unlawful actions both improperly intrude on the City of  
6 Los Angeles’ ability to maintain law and order and impair the City’s tax revenues.

7 *First*, Defendants’ unlawful searches and seizures are frustrating the City’s  
8 ability to maintain law and order and keep Angelenos safe. The Ninth Circuit has  
9 recognized that a municipality’s interest in enforcing “health and safety regulations”  
10 supports intervention as of right. *See Scotts Valley Band of Pomo Indians of Sugar*  
11 *Bowl Rancheria v. United States*, 921 F.2d 924, 928 (9th Cir. 1990) (reversing  
12 district court’s denial of city’s motion to intervene as of right). The City’s basis for  
13 intervention is even stronger here, as Defendants’ violations of federal law threaten  
14 the “safety of persons and property” in Los Angeles—a “core” responsibility  
15 “unquestionably” entrusted to the City’s police power. *Kelley v. Johnson*, 425 U.S.  
16 238, 247 (1976). Defendants’ unlawful policies are striking “terror” across Los  
17 Angeles, as unidentified federal agents sideline local law enforcement to invade  
18 homes, businesses, schools, churches, workplaces, hospitals, and courthouses, and  
19 indiscriminately stop and detain Los Angeles residents to determine their  
20 immigration status. Lead Compl. ¶¶ 2–3, 36–49, 97, 149; *see* Estrada Decl. Ex. A  
21 (Mayor Bass describing “the fear and the terror that [the raids have] created in our  
22 city, when you have cars driving around, people jumping out of those cars with guns  
23 and rifles and pulling people off the street”).

24 As a result of Defendants’ actions, City law enforcement is forced to divert  
25 limited resources to determine whether armed individuals exiting unmarked vehicles  
26 are masked, unidentified federal agents—or masked, unidentified criminals. *See*  
27 Estrada Decl. Ex. B at 2 (describing an incident where “a man stepped out of his  
28 unmarked vehicle at an intersection, unholstered his pistol and aimed it at a group of

1 pedestrians,” leaving local law enforcement in the aftermath to “determine that to  
2 the best of [their] estimation he was an ICE agent”). And when the federal agents  
3 are gone, City police are left to deal with protests and fractured trust from  
4 Angelenos, threatening decades of progress gained through longstanding  
5 community-policing efforts. *See id.* at 1 (explaining that “[p]olice have little or no  
6 insight into where the federal enforcement actions are taking place but often have to  
7 deal with the aftermath, including protests and questions from residents about what  
8 exactly happened”).<sup>1</sup> The City has a “significant[] protectable interest” in defending  
9 its ability to police itself. *See Scotts Valley*, 921 F.2d at 927; *see also Washington v.*  
10 *U.S. Dep’t of Homeland Sec.* 614 F. Supp. 3d 863, 881 (W.D. Wash. 2020)  
11 (recognizing claim for ICE’s “undu[e] interfere[nce] with [the states’] core  
12 sovereign judicial and police functions in violation of the rights reserved to [the  
13 states] by the Constitution”); *New York v. U.S. Immigr. & Customs Enf’t*, 431 F.  
14 Supp. 3d 377, 394 (S.D.N.Y. 2019) (same).

15 *Second*, Defendants’ actions threaten the City’s tax revenue. *See Scotts*  
16 *Valley*, 921 F.2d at 927–28 (threat of “los[t] tax revenue . . . establish[ed] a  
17 protectable interest” supporting intervention); *cf. City of Oakland v. Lynch*, 798 F.3d  
18 1159, 1164 (9th Cir. 2015) (an “expected loss of tax revenue can constitute a  
19 sufficient injury” to confer Article III standing). Defendants’ unlawful immigration  
20 raids have devastated community businesses. *See Estrada Decl. Ex. K* (John  
21 Gittelsohn, *ICE Raids Derail Los Angeles Economy as Workers Go Into Hiding*,  
22 Bloomberg (July 6, 2025) (“[b]usinesses have shuttered” as a result of federal  
23 immigration raids)). As Mayor Bass put it, businesses are “empty” because workers  
24  
25

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26 <sup>1</sup> *See generally* Estrada Decl. Ex. J (Les Dunseith, *UCLA Study Finds Strong*  
27 *Support for LAPD’s Community Policing Program*, UCLA Luskin Sch. Pub. Affs.  
28 (May 21, 2020)).

1 are “too afraid to come into work” and customers “feel they can’t go outside of their  
2 house.” Estrada Decl. Ex. A.

3 The damage to these businesses directly harms the City’s tax revenues. In the  
4 past two years, business taxes made up approximately 6.5% of the City’s annual  
5 revenue budget.<sup>2</sup> Those taxes are generally based on gross receipts.<sup>3</sup> Empty  
6 businesses do not generate gross receipts—and thus do not pay business taxes to the  
7 City. The ongoing harm to the City’s tax revenue is a further protectable interest  
8 warranting intervention. *See Scotts Valley*, 921 F.2d at 927–28.

9 (b) *The County of Los Angeles Has a Significantly Protectable*  
10 *Interest in the Lead Action*

11 Since June 7, 2025, federal immigration agents have conducted frequent,  
12 large-scale raids across Los Angeles County in public parks and streets, hospitals,  
13 private homes, businesses, swap meets, parking lots, and in front of courthouses,  
14 among a multitude of other locations that impact virtually every facet of life for  
15 County residents.

16 Video footage and eyewitness accounts reveal that federal immigration agents  
17 typically have not shown judicial or even administrative warrants when conducting  
18 their operations. Some of the individuals detained, questioned, and arrested in these  
19 operations are U.S. citizens or hold valid immigration status; agents presumably did  
20 not have reasonable suspicion or probable cause to suspect immigration violations in  
21 at least these cases, and perhaps even in many cases of those without legal status.

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22 <sup>2</sup> Compare Estrada Decl. Ex. L (showing the “Business Tax” revenue source for  
23 2024–2025 was \$837.06 million, or “6.53% of Revenue Budget”) with *id.* Ex. M  
24 (showing the “Business Tax” revenue source for 2023–2024 was \$847.20 million, or  
25 “6.44% of Revenue Budget”).

26 <sup>3</sup> Estrada Decl. Ex. N (City of Los Angeles Office of Finance webpage entitled  
27 “About the Business Tax” explaining that “[m]ost business taxes are based on gross  
28 receipts. For those Business Tax Classifications, the tax rate is a specified amount  
per \$1,000 of taxable gross receipts for each tax classification.”).

1 One such encounter, which was shared in social media, showed an ICE agent  
2 repeatedly asking a twenty-nine-year-old Hispanic man, who is a U.S. citizen:  
3 “What hospital were you born at?” while detaining him. *See Estrada Decl. Ex. O*  
4 (Jennifer Medina, *‘I’m an American, Bro!’: Latinos Report Raids in Which U.S.*  
5 *Citizenship Is Questioned*, New York Times (June 15, 2025)). Video footage and  
6 eyewitness accounts also indicate that federal immigration agents often wear masks  
7 and plainclothes and do not identify themselves during these raids, heightening fear  
8 and tension among County residents who are investigated or detained, as well as  
9 bystanders and those who hear of the raids through the media accounts, word of  
10 mouth, and social media posts. *Id.*

11 The masked, unidentified federal agents have created such a climate of fear,  
12 mistrust, and suspicion that County employees ranging from Sheriff’s Department  
13 deputies to social workers have been mistaken for federal agents and confronted  
14 with vandalism of their vehicles, accusations, harassment, and threats, as well as  
15 non-cooperation.

16 Immigration raids in Los Angeles County have occurred at a clothing  
17 wholesaler where individuals were shopping, at a taco stand, and on County streets.  
18 Many immigration raids have been recorded and shared on social media,  
19 heightening the fear in Latino communities in particular of participating in regular  
20 day-to-day activities. *See id.* Ex. I. As a result, food vendors, retailers, and even  
21 historic landmarks and tourist sites have seen decreases in business. Some residents  
22 no longer shop at corner stores and stay holed up in their homes.

23 (c) *The City of Culver City Has a Significantly Protectable*  
24 *Interest in the Lead Action*

25 Immigration raids carried out by masked individuals who lack arrest warrants  
26 have occurred throughout Culver City since late May 2025. As a result of federal  
27 agents’ raids—many of which involve masked agents in tactical gear without visible  
28 identification in unmarked vehicles—Culver City has had to divert its limited



1 resources to addressing community safety concerns, including continuously  
2 monitoring suspected federal enforcement activity in an attempt to confirm the  
3 identity and legitimacy of individuals claiming to act as federal agents.

4 Defendants' unlawful immigration enforcement activities also have had a  
5 detrimental impact on Culver City's tax revenues. For example, the week of June  
6 23, 2025 was the first week in 2025 where visits to the Culver City Westfield Mall  
7 were down all seven days of the week, across all hours of the day. This kind of  
8 harm to Culver City's businesses has, in turn, decreased Culver City's business tax  
9 revenues. Defendants' unlawfully conducted immigration raids continue to cause  
10 irreparable injuries to Culver City's ability to maintain law and order and its ability  
11 to obtain crucial business tax revenue. Thus, Culver City has a significantly  
12 protectable interest in the Lead Action.

13 *(d) The City of Monterey Park Has a Significantly Protectable*  
14 *Interest in the Lead Action*

15 Defendants' unlawful immigration activities within the Los Angeles region  
16 have cultivated a culture of fear and distrust within the Monterey Park community.  
17 Residents of immigrant communities have expressed fear due to reports of masked,  
18 unidentified individuals (allegedly federal immigration agents or vigilantes)  
19 detaining people without due process. Even U.S. citizens fear being mistaken for  
20 undocumented immigrants and unlawfully detained. Monterey Park residents have  
21 thus demanded that the Monterey Park Police Department take proactive measures  
22 to verify the identity of purported federal agents to ensure public safety. In  
23 response, Monterey Park has expended public resources to educate its residents on  
24 their rights, and to protect its residents during Defendants' illegal activities. Those  
25 efforts interfere with Monterey Park's role in protecting the public health, safety,  
26 and well-being of its residents.

27 Defendants' unconstitutional activities also have been detrimental to the  
28 relationship of trust, respect, and open communication that Monterey Park officials



1 have developed and count on with their residents, and have thus undermined local  
2 law enforcement efforts. The City of Monterey Park therefore has a significantly  
3 protectable interest in the Lead Action.

4 (e) *The City of Montebello Has a Significantly Protectable*  
5 *Interest in the Lead Action*

6 Unlawful immigration enforcement activities have occurred at numerous  
7 locations throughout Montebello. On June 13, 2025, for example, federal  
8 immigration agents violently and unlawfully arrested a United States citizen at his  
9 tow truck place of employment in the City.

10 There have been numerous federal immigration actions throughout  
11 Montebello at various business and residential locations within the city. Businesses  
12 are shutting down because of these federal immigration activities. Defendants'  
13 actions have spurred protests that have impacted both businesses and Montebello  
14 Police Department resources. Defendants' federal immigration enforcement has  
15 spread fear, confusion, and distress across the Montebello community. Montebello  
16 residents, even those who have lived in the city for decades, feel unsafe going  
17 outside to engage in everyday activities, such as commuting to work, taking their  
18 children to school, and attending community events due to concerns that they could  
19 be arbitrarily confronted and assaulted by federal agents.

20 (f) *The City of Pasadena Has a Significantly Protectable*  
21 *Interest in the Lead Action*

22 Defendants' unlawful immigration activities have spread fear, confusion, and  
23 distress among Pasadena residents, including those who have lived in the city for  
24 decades. Residents feel unsafe going outside to engage in everyday activities, such  
25 as commuting to work, taking their children to school, and attending community  
26 events, as they fear they could be arbitrarily assaulted, arrested, or detained by  
27 federal agents, regardless of their immigration status.

28 Defendants' unlawful enforcement efforts have forced Pasadena to divert its  
limited police resources to address public safety issues that would not have arisen

absent these enforcement practices. For example, plainclothes federal agents jumped out of unmarked vehicles and attempted to arrest a Pasadena resident in front of her children outside a Pasadena apartment building on June 28, 2025, prompting a 911 call to Pasadena Police about a suspected kidnapping. Estrada Decl. Ex. D. Defendants' activities have also led to declines in public participation in Pasadena's community programs, such as youth summer education and, in other cases, have forced Pasadena to cancel swim lessons and other community programs altogether due to public safety concerns.

Importantly, Defendants' illegal raids, detentions and arrests also have resulted in a marked decline in businesses' sales revenue and a corresponding decrease in Pasadena's tax revenue, as customers stay home, and local businesses remain closed due to residents' fear of being the next target of Defendants' unlawful immigration raids. *Id.* Ex. P (Victor M. Gordo, *Pasadena Mayor: Trump's Immigration Raids Hurt Communities Like Mine*, Time (June 18, 2025)).

(g) *The City of Pico Rivera has a Significantly Protectable Interest in the Lead Action*

Unlawful federal immigration enforcement activities have occurred at numerous locations throughout Pico Rivera, including the violent and unwarranted arrest of U.S. citizen Adrian Martinez on June 17, 2025 in a Walmart parking lot. This incident led to multiple community protests, including rallies outside of Pico Rivera City Hall. Another significant incident occurred on June 17, 2025 at Ruben Salazar High School, where federal agents trespassed and publicly urinated on El Rancho Unified School District property, near locations where minor children were located.

Defendants' immigration enforcement actions have spread fear, confusion, and distress across the Pico Rivera community. Pico Rivera residents, even those who have lived in the city for decades, feel unsafe going outside to engage in everyday activities, such as commuting to work, taking their children to school, and

1 attending community events due to concerns that they could be arbitrarily  
2 confronted and assaulted by federal agents.

3 Defendants' unlawful actions have forced Pico Rivera to divert its limited  
4 police resources to address public safety issues that would not have arisen absent  
5 these enforcement practices. Federal immigration enforcement also has harmed  
6 Pico Rivera businesses, causing declines in businesses' sales revenue and a  
7 corresponding decrease in essential tax revenues on which Pico Rivera depends to  
8 fund its municipal operations. The City of Pico Rivera thus has a significantly  
9 protectable interest in the Lead Action.

10 (h) *The City of Santa Monica Has a Significantly Protectable*  
11 *Interest in the Lead Action*

12 Defendants' unwarranted and aggressive immigration enforcement activity  
13 has caused a significant decline in Santa Monica's tourism revenue, as a marked  
14 decrease in international arrivals has resulted in substantial reductions in hotel  
15 occupancy rates and overall spending.

16 At the same time, members of local immigrant communities have been  
17 staying home in large numbers out of fear of being caught up in an unlawful  
18 immigration raid, with many community members failing to report to work or  
19 participate in public events. Since many of Santa Monica's businesses rely on local  
20 residents' labor, including hotels, restaurants, sidewalk vendors, farmers' markets,  
21 car washes, and construction businesses, the resulting staffing shortages have  
22 affected business revenue, employment, and overall economic growth. Santa  
23 Monica, in turn, loses critical transient occupancy and sales tax revenue it depends  
24 on to meet its municipal obligations.

25 Additionally, victims of misdemeanor crimes that have occurred within the  
26 City have been reluctant to cooperate with prosecutors, requiring the Santa Monica  
27 City Attorney's Office to go to extra lengths to secure witnesses' appearance in  
28

1 court. Local residents' fear of being caught up in Defendants' unlawful immigration  
2 raids is thus impacting the City's ability to obtain just outcomes for crime victims.

3 The City of Santa Monica thus has a significantly protectable interest in the  
4 Lead Action.

5 (i) *The City of West Hollywood Has a Significantly*  
6 *Protectable Interest in the Lead Action*

7 Defendants' unlawful immigration activities in West Hollywood, including an  
8 apparently warrantless July 4 raid at a West Hollywood car wash, are interfering  
9 with the City's ability to protect the public health, safety, and well-being of its  
10 residents.

11 Defendants' actions have diverted West Hollywood's law enforcement  
12 resources and obstructed the City's ability to carry out key public safety objectives.  
13 West Hollywood contracts with the Los Angeles County Sheriff's Department for  
14 law enforcement services. In early June, the County Sheriff's Department was  
15 required to divert significant resources to address protests in nearby cities resulting  
16 from Defendants' unlawful actions, forcing the West Hollywood City Council to  
17 reschedule the discussion of a public safety issue that was of critical importance to  
18 the community. Defendants' actions also resulted in protests in West Hollywood  
19 Park on June 14, 2025, reportedly attended by approximately 3,000 people, in  
20 response to which the City and Sheriff's Department had to expend further resources  
21 to maintain safety and order.

22 Taxpaying businesses in West Hollywood also have suffered economic harm  
23 due to Defendants' immigration enforcement activities. Individuals who fear  
24 Defendants' immigration raids are choosing to remain at home, resulting in fewer  
25 open businesses and fewer people patronizing the businesses that remain open. In  
26 addition, West Hollywood is a hospitality destination, and local hotels have reported  
27 that visitor rates are down overall for the international visitors who used to frequent  
28 West Hollywood in the summer. As a result of the City's hospitality-based

1 economy, West Hollywood businesses are particularly vulnerable to the chilling  
2 effects Defendants' actions have not only on visits to hotels, but also on the bars,  
3 restaurants, and nightclubs that visitors often frequent when staying in the City.

4 Defendants' unlawful activities also are resulting in the unnecessary  
5 expenditure of West Hollywood's public resources. In response to community  
6 concerns, West Hollywood has expended public resources to provide "Know Your  
7 Rights" information to residents at City facilities and online. West Hollywood also  
8 is engaging in efforts to expand outreach and make information more accessible at  
9 public events and locations, develop clear protocols for local Sheriffs' involvement  
10 during federal immigration-enforcement activities, and provide assurances that local  
11 law enforcement stands with and protects all residents, regardless of immigration  
12 status. The City of West Hollywood thus has a significantly protectable interest in  
13 the Lead Action.

### 14 **3. A Judgment for Defendants May Impair Intervenor's** 15 **Significantly Protectable Interests**

16 After finding a proposed intervenor has a significant protectable interest,  
17 courts "have little difficulty concluding" that the disposition of the case "may, as a  
18 practical matter, affect it." *See, e.g., Lockyer v. United States*, 450 F.3d 436, 442  
19 (9th Cir. 2006); *see Berg*, 268 F.3d at 822 (if a proposed intervenor "would be  
20 substantially affected in a practical sense by the determination made in an action, he  
21 should, as a general rule, be entitled to intervene") (citation omitted).

22 There can be no doubt that a judgment permitting Defendants to continue  
23 carrying out sweeping unlawful immigration raids will impair Intervenor's  
24 respective interests. Defendants' actions will further damage Intervenor's ability to  
25 maintain law and order and erode the relationships law enforcement has spent years  
26 building with local communities. *Cf. City of Chicago v. Sessions*, 888 F.3d 272, 280  
27 (7th Cir. 2018), *reh'g en banc granted in part, opinion vacated in part by City of*  
28 *Chicago v. Sessions*, 2018 WL 4268817 (7th Cir. June 4, 2018), *vacated*, 2018 WL

1 4268814 (7th Cir. Aug. 10, 2018) (local law enforcement’s inability to “obtain . . .  
2 victim and witness cooperation” from “persons who are here unlawfully . . . could  
3 both hinder law enforcement efforts and allow criminals to freely target  
4 communities with a large undocumented population”). At the same time,  
5 Defendants’ actions would continue hollowing out local business—creating a  
6 situation “worse than COVID”—and depriving Intervenor’s of tax revenues. Estrada  
7 Decl. Ex. A. Because Intervenor’s “would be substantially affected in a practical  
8 sense by the determination” in this case, they are entitled to intervene as of right.  
9 *See Berg*, 268 F.3d at 822 (citation omitted).

10 **4. Plaintiffs May Not Adequately Represent Intervenor’s**  
11 **Interests**

12 Intervenor’s unquestionably meet their “minimal” burden to show that, even  
13 though Plaintiffs and Intervenor’s have some interests in common, Plaintiffs “may  
14 be” inadequate representatives of Intervenor’s interests. *Trbovich v. United Mine*  
15 *Workers of Am.*, 404 U.S. 528, 538 n.10 (1972); *see Berger v. N.C. State Conf. of*  
16 *the NAACP*, 597 U.S. 179, 197 (2022) (“Where ‘the absentee’s interest is similar to,  
17 but not identical with, that of one of the parties,’ that normally is not enough to  
18 trigger a presumption of adequate representation.” (citation omitted)).

19 Courts evaluating adequacy of representation examine three factors:

20 (1) “whether the interest of a present party is such that it will undoubtedly make all  
21 of a proposed intervenor’s arguments”; (2) “whether the present party is capable and  
22 willing to make such arguments”; and (3) “whether a proposed intervenor would  
23 offer any necessary elements to the proceeding that other parties would neglect.”  
24 *Arakaki*, 324 F.3d at 1086. It is sufficient for a proposed intervenor to show that  
25 because of a “difference in interests, it is likely that [the existing parties] will not  
26 advance the same arguments as Applicants.” *Berg*, 268 F.3d at 824.

27 While Plaintiffs and Intervenor’s share an interest in stopping Defendants’  
28 unconstitutional actions, Intervenor’s also have distinct interests in maintaining law



1 and order and preserving essential business tax revenues for the benefit of their  
2 residents. None of the current Plaintiffs represent those interests.<sup>4</sup> The gap between  
3 Intervenor’s broad municipal interests and Plaintiffs’ “more narrow” ones is  
4 sufficient to establish the requisite inadequacy of representation for intervention as  
5 of right. *See Californians for Safe & Competitive Dump Truck Transp. v.*  
6 *Mendonca*, 152 F.3d 1184, 1190 (9th Cir. 1998) (affirming grant of union’s motion  
7 to intervene in federal preemption action and holding that “because the employment  
8 interests of [the union]’s members were potentially more narrow and parochial than  
9 the interests of the public at large, [the union] demonstrated that the representation  
10 of its interests by the named [governmental] defendants-appellees may have been  
11 inadequate”); *see also Scotts Valley*, 921 F.2d at 926–27 (reversing district court’s  
12 denial of city’s motion to intervene as of right where remaining parties were “not in  
13 a position adequately to protect any of the City’s municipal interests” because “they  
14 do not directly share the City’s municipal interest”). Because Plaintiffs are not in a  
15 position to represent Intervenor’s distinct interests, the Court should grant  
16 Intervenor the right to intervene and represent their interests themselves.

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17  
18  
19  
20 <sup>4</sup> Plaintiff Immigrant Defenders’ mission is to “defend[] immigrant communities  
21 against injustices in the immigration system.” Estrada Decl. Ex. K (Immigrant  
22 Defenders’ 2023–2026 Strategic Plan). Plaintiff The Coalition for Humane  
23 Immigrant Rights’ stated mission is to “achieve a just society, fully inclusive of  
24 immigrants.” *Id.* Ex. L (The Coalition for Humane Immigrant Rights, Mission &  
25 History, <https://www.chirla.org/who-we-are/about-us/mission-history/> (last visited  
26 July 8, 2025)). Plaintiff Los Angeles Worker Center Network exists to “address  
27 injustices faced by low-wage workers in the greater Los Angeles area.” Lead  
28 Compl. ¶ 17. Plaintiff United Farm Workers “aims to improve the lives, wages, and  
working conditions of agricultural workers and their families.” Lead Compl. ¶ 18.  
The remaining Plaintiffs are individuals who were victims of Defendants’ unlawful  
immigration raids. Lead Compl. ¶¶ 12–16.



1           **B. In the Alternative, the Court Should Grant Permissive**  
2           **Intervention Under Fed. R. Civ. P. 24(b)(1)**

3           Should the Court determine Intervenor's do not meet the requirements to  
4 intervene as of right, the Court should exercise its discretion and grant intervention  
5 under Fed. R. Civ. P. 24(b)(1). A party may be granted permissive intervention  
6 under Rule 24(b)(1) when it: (1) brings a timely motion; (2) has a claim or defense  
7 that shares a common question of law or fact with the main action; and (3) has an  
8 independent ground for jurisdiction. *Blum v. Merrill Lynch Pierce Fenner & Smith,*  
9 *Inc.*, 712 F.3d 1349, 1353 (9th Cir. 2013). In determining whether to exercise its  
10 discretion to grant permissive intervention, the Court considers “whether the  
11 intervention will unduly delay or prejudice the adjudication of the original parties’  
12 rights.” Fed. R. Civ. P. 24(b)(3). Intervenor's meet the requirements for permissive  
13 intervention.

14           *First*, this Motion is timely. As explained in Section III.A.1 *supra*,  
15 Intervenor's moved to intervene just three court days after Plaintiffs filed their Lead  
16 Complaint. *See* Lead Complaint (filed July 2, 2025). Because Intervenor's filed  
17 their Motion “at an early stage of the proceedings,” the parties will suffer no  
18 prejudice “from the grant of intervention at that early stage,” and “intervention  
19 [will] not cause disruption or delay in the proceedings.” *Mont. Wilderness Ass’n*,  
20 647 F.3d at 897.

21           *Second*, Plaintiffs’ and Intervenor's’ claims involve common questions of fact  
22 and law. Both sets of claims arise from the unlawful federal raids in Los Angeles  
23 and the surrounding area. Common questions of fact include, for example,  
24 Defendants’ (1) arrests of individuals in Intervenor's’ respective jurisdictions, and  
25 whether these arrests occurred without warrants and without probable cause of flight  
26 risk; (2) detentions of Intervenor's’ residents, and whether federal agents had  
27 reasonable suspicion supporting these detentions; and (3) detainment conditions of  
28 Intervenor's’ residents, including Defendants’ failure to explain to those in custody

1 their rights. Whether the factual circumstances amount to a violation of  
2 Constitutional rights is the critical common question of law.

3 *Third*, this Court has federal question jurisdiction under 28 U.S.C. § 1331  
4 over those claims in Intervenor’s Proposed Complaint in Intervention that are  
5 different from the claims in the Lead Complaint.

6 Without question, should the Court conclude that Intervenor’s are not entitled  
7 to intervene as a matter of right, the Court should nonetheless exercise its discretion  
8 in favor of permissive intervention. *See* Fed. R. Civ. P. 24(b). As the entities  
9 responsible for upholding law and order in their respective municipalities, and  
10 administering key municipal operations, Intervenor’s offer valuable perspectives on  
11 how Defendants’ actions affect both the local government and the local community.  
12 And intervention should be permitted when, as here, the proposed intervenor’s  
13 “input is likely to make a significant and useful contribution to the development of  
14 the underlying factual and legal issues.” 6 James Wm. Moore et al. *Moore’s*  
15 *Federal Practice* § 24.10 (2025); *see T-Mobile Ne. LLC v. Town of Barnstable*, 969  
16 F.3d 33, 41 (1st Cir. 2020) (“[A] district court mulling permissive intervention is  
17 free to consider whether the applicants may be helpful in fully developing the case.”  
18 (cleaned up)).

19 **IV. CONCLUSION**

20 For the foregoing reasons, the City of Los Angeles, the County of Los  
21 Angeles, and the Cities of Culver City, Montebello, Monterey Park, Pasadena, Pico  
22 Rivera, Santa Monica, and West Hollywood respectfully request that the Court grant  
23 their Motion to Intervene and file the Proposed Complaint in Intervention attached  
24 as Exhibit A.

1 DATED: July 8, 2025

Respectfully submitted,

2  
3 By: /s/ E. Martin Estrada

4 E. MARTIN ESTRADA

5 MUNGER, TOLLES & OLSON LLP

6 *Attorney for Proposed Intervenors*  
7 *Cities of Los Angeles, Culver City,*  
8 *Montebello, Monterey Park, Pico Rivera,*  
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10 By: /s/ Hydee Feldstein Soto

11 HYDEE FELDSTEIN SOTO  
12 City Attorney

13 OFFICE OF THE LOS ANGELES  
14 CITY ATTORNEY

15 *Attorney for Proposed Intervenor*  
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17 By: /s/ Brigit Greeson Alvarez

18 BRIGIT GREESON ALVAREZ  
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24 By: /s/ Michele Beal Bagneris

25 MICHELE BEAL BAGNERIS  
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27 OFFICE OF THE CITY ATTORNEY OF  
28 PASADENA

*Attorney for Proposed Intervenor*  
*City of Pasadena*

**ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: July 8, 2025

By: /s/ E. Martin Estrada

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**LOCAL RULE 11-6.2 CERTIFICATION**

The undersigned, counsel of record for the Cities of Los Angeles, Culver City, Montebello, Monterey Park, Pico Rivera, Santa Monica, and West Hollywood, certifies that this brief contains 6,422 words, which complies with the word limit of L.R. 11-6.2.

DATED: July 8, 2025

By: /s/ E. Martin Estrada

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