	Case 3:25-cv-04870-CRB	Document 154	Filed 08/11/25	Page 1 of 12
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13	IN TE	HE UNITED STAT	TES DISTRICT COU	JRT
14			STRICT OF CALIF	
15				
16				
17				
18	GAVIN NEWSOM, IN HIS OF CAPACITY AS GOVERNOR OF T		NO. 3:25-cv-04870)
19	CALIFORNIA; STATE OF CA			
20		Plaintiffs,	JOINT EXHIBIT	LIST
21	v.			
22	DONALD TRUMP, IN HIS OI	FFICIAL		
23	CAPACITY AS PRESIDENT OF T STATES; PETE HEGSETH, I	THE UNITED		
24	CAPACITY AS SECRETARY OF DEPARTMENT OF DEFENSE; U	THE		
25	DEPARTMENT OF DEFEN			
26		Defendants.		
27	•		l	
28				

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's July 29, 2025, Order for Pretrial Preparation for Civil Bench Trial (ECF No. 123), the Parties hereby submit the following exhibit list for trial in this case commencing on August 11, 2025.

PRELIMINARY STATEMENT

The Parties reserve the right to amend or augment this list, including for the purposes of impeachment, rebuttal, or consolidation up to and during the time of trial. These disclosures are based upon the facts, information, and documents presently known and available to the Parties.

The Parties met and conferred and agreed to stipulate to the admissibility of certain exhibits. Exhibits with a Y in the "Stipulated" column are those that that the Parties have stipulated to admit. The "Sealing" column denotes exhibits that are subject to Defendants Administrative Motion to Seal, ECF No. 152, and the column indicates whether Defendants seek to redact the exhibit or seal it in full.

EXHIBITS

Ex. No.	Description	Start Bates No.	End Bates No.	Stipulated	Admitted	Limits	Sealing
			Volume 1 1-28				
1	Standing Rules for Use of Force Card	DEFS_00000001	DEFS_00000002	Y			
2	June 23, 2025, Memorandum re: Execution of Presidentially Directed Mission to Protect Federal Law Enforcement Personnel and Functions in California	DEFS_00000003	DEFS_00000004	Y			
3	June 9 DoD Memorandum	DEFS_00000006	DEFS_00000009	Y			
4	SRUF De-escalation Cards	DEFS_00000010	DEFS_00000011	Y			
5	ARNORTH General Order Number 1 (GO-1)	DEFS_00000012	DEFS_00000014	Y			Redacted
6	June 13, 2025, Email re: Situational Reports	DEFS_00000021	DEFS_00000026	Y			Redacted
7	TF-51 CONOP Process for LA JOA	DEFS_00000249	DEFS_00000252	Y			
8	Legal Considerations of California Federal Protection Mission	DEFS_00001057	DEFS_00001071	Y			Redacted
	1	1	1	1	1	<u>I</u>	1

9	Standing Rules for Use of Force	DEFS_00001072	DEFS_00001074	Y			
10	Task Force 51 Standing Rules for the Use of Force Calif. Fed. Protection Mission Training Slides	DEFS_00001095	DEFS_00001162	Y			
11	FRAGORD 07	DEFS_00001180	DEFS_00001195	Y			Redacte
12	Email Correspondence from DHS Area Commander Phil Olivero dated June 13 and 14, 2025.	DEFS_00001212	DEFS_00001214	N			Redacto
13	Null	Null	Null	Null	Null	Null	Null
14	TF-51 OPORD 25-001	DEFS_00002468	DEFS_00002475	Y			Redacte
15	Action Memo from the Undersecretary of Defense	DEFS_00002531	DEFS_00002550	Y			Redacto
16	Duplicate leave blank	Duplicate leave blank	Duplicate leave blank				
17	June 7 Presidential Memorandum	DEFS_00002545	DEFS_00002546	Y			
18	June 7 DoD Memorandum	DEFS_00002548	DEFS_00002548	Y			
19	June 24, 2025, Email re: Informal RFI	DEFS_00002553	DEFS_00002556	Y			Redacto
20	Email: PHOTOS - Crowd Control 2	DEFS_00002566	DEFS_00002572	Y			Redacto
21	Summary Table: Title 10 DoD Support vs Law Enforcement (attached to 6/18/25 FRAGORD 10)	DEFS_00002619	DEFS_00002621	N			Sealed full
22	June 13, 2025, Email to Maj. Gen. Sherman and attachment	DEFS_00002661	DEFS_00002662	Y			Redacto
23	OPORD 25-001 Federal Property Protection/Civil Disturbance Operations ISO DHS ICE in Vicinity of Los Angeles	DEFS_00002693	DEFS_00002701	Y			Redact
24	June 8, 2025, Email re: Civil Disturbance Training	DEFS_00002801	DEFS_00002802	Y			Redacto
25	June 9, 2025, Email and attachments re: Federal Protection Mission	DEFS_00002830	DEFS_00002833	Y			Redacto
26	June 9, 2025, Email re: 79th Infantry Brigade Combat Team Readiness	DEFS_00002837	DEFS_00002838	Y			Redacto
27	June 14, 2025, Email re: MacArthur Risk Concerns	DEFS_00002841	DEFS_00002843	Y			Redacto

28	Slides for Los Angeles Federal Protection Mission at MacArthur Park - Operation Excalibur	DEFS_00002872	DEFS_00002895	Y	Redac
			Volume 2 29-48		
29	Task Force 51 MacArthur Park Planning Documents	DEFS_00002961	DEFS_00002965	Y	Redac
30	June 11, 2025 Email re: End of Day Update	DEFS_00003009	DEFS_00003011	Y	Redac
31	Task Force 51 Planning Documents for RFA #37	DEFS_00003509	DEFS_00003522	Y	Redac
32	FRAGORD 22	DEFS_00003580	DEFS_00003607	Y	Redac
33	June 23, 2025, Email re: Fed Agency Requests to DoD	DEFS_00003851	DEFS_00003851	Y	Redac
34	June 14, 2025, Email re: MacArthur Park Update	DEFS_00004191	DEFS_00004191	Y	Redac
35	USARNORTH FRAGORD 25-501.000	DEFS_00004422	DEFS_00004431	Y	Redac
36	Maj. Gen. Sherman Task Force 51 Pres Statement	DEFS_00005035	DEFS_00005038	Y	
37	Commander's Critical Information Requirements Reporting Procedures	DEFS_00005932	DEFS_00005934	Y	Redact
38	June 13, 2025, Mission Debrief	DEFS_00006271	DEFS_00006271	Y	Redact
39	June 17, 2025, Email re: RFAs	DEFS_00007307	DEFS_00007311	Y	Redact
40	Email: Marines Detain Civilian - PAO & Media Response	DEFS_00008251	DEFS_00008255	Y	Redact
41	143rd Military Police Detention Battalion Operation Slide	DEFS_00010396	DEFS_00010396	Y	
42	TF-51 Federal Protection Mission	DEFS_00013354	DEFS_00013363	Y	
43	July 2, 2025, Email re: DHS/ICE Support Update from LA Federal Protection Mission	DEFS_00016881	DEFS_00016883	Y	Redact
44	Task Force 51 Federal Protection Mission Presentation	DEFS_00016913	DEFS_00016922	Y	

45	OSD(PA) Briefing Card - DOD Federal Protection Mission	DEFS_00017668	DEFS_00017672	Y			Reda
46	June 29, 2025, Email re: Macarthur Park Executive Brief	DEFS_00017903	DEFS_00017905	Y			Reda
47	June 16, 2025, Email re: Los Angeles Protection Plans Update	DEFS_00018000	DEFS_00018001	Y			Reda
48	JRSOI Legal Brief Presentation – Operation Border Support Standing Rules for the Use of Force	DEFS_00018009	DEFS_00018186	Y			Reda
			Volume 3 49-97				
49	June 26, 2025, Email re: Task Force 51 Los Angeles Operations Update	DEFS_00018345	DEFS_00018350	Y			Reda
50	San Diego Post article/Photo of Camarillo cannabis farm dated (July 10, 2025)	PLS_00000016	PLS_00000019	N			
51	Decl. of Ernesto Santacruz, Jr. ISO Def. Opposition to TRO	ECF 25-1, Ex. 1		N			
52	Decl. of Major General Niave F. Knell ISO Def. Opposition to TRO	ECF 25, Ex. 4		N			
53	ICE Post on X dated June 10, 2025 (ECF No. 39-1, Ex. 3)	ECF 39-1, Ex. 3		Y			
54	ICE Post on X dated June 10, 2025, at 11:56 AM PST	ECF 39-1, Ex. 2		Y			
55	Decl. of Joseph Zizi	ECF No. 77, Ex.		N			
56	Null	Null	Null	Null	Null	Null	Null
57	Decl. of Ernesto Santacruz, Jr. ISO Def. Opposition to PI	ECF 84, Ex. 1		N			
58	Decl. of Steven S. Nordhaus ISO Def. Opposition to PI	ECF 84, Ex, 2		N			
59	Decl. of Major General Scott Sherman ISO Def. Opposition to PI	ECF 84, Ex. 3		N			
60	Decl. of Daniel Randolph ISO of Pl. Reply	ECF 87, Ex. 4		N			
61	Decl. of Sean Duryee ISO of Pl. Reply	ECF No. 87-3		N			

62	Decl. of Dylan Verner-Crist ISO of Pl. Reply	ECF No. 87-5	N	
63	DVIDS Photo [1]	ECF 127-2, Ex. 5	Y	
64	DVIDS Photo [2]	ECF 127-2, Ex. 6	Y	
65	DVIDS Photo [3]	ECF 127-2, Ex. 7	Y	
66	DVIDS Photo [4]	ECF 127-2, Ex. 8	Y	
67	DVIDS Photo [5]	ECF 127-2, Ex. 9	Y	
68	DVIDS Photo [6]	ECF 127-2, Ex.	Y	
69	DVIDS Photo [7]	ECF No. 127-2, Ex. 14	Y	
70	DVIDS Photo [8]	ECF 127-2, Ex.	Y	
71	DVIDS Photo [9]	ECF 127-2, Ex.	Y	
72	DVIDS Photo [10]	ECF 127-2, Ex.	Y	
73	DVIDS Photo [11]	ECF 127-2, Ex.	Y	
74	Task Force 51 is the U.S. Army North's Contingency Command Post	ECF 127-2, Ex.	Y	
75	DVIDS Photo [11]	ECF 127-2, Ex.	Y	
76	DVIDS Photo [12]	ECF 127-2, Ex. 23	Y	
77	DVIDS Mission Statement	ECF 127-2, Ex. 27	Y	
78	Declaration of Monica Solarzano ISO Plaintiffs Supp. PI.	ECF 127-3	Y	
79	July 10, 2025, Carpinteria Photo	ECF 127-4, Ex. A	Y	
80	July 10, 2025, Carpinteria Video	ECF 127-4, Ex. B	Y	
81	Declaration of Genevieve Flores-Haro ISO Plaintiffs Supp. PI.	ECF 127-5	N	
82	Camarillo Photograph [1]	ECF 127-6, Ex.	Y	

			Volume 7			
101	Scott Sherman Marked Depo Exhibit 19			N		
100	Deposition Transcript of Major General Scott Sherman			N		
			Volume 6 100-101			
99	Deposition Transcript of Ernesto Santacruz, Jr.			N		
0.5			99			
	Deposition Transcript of William Harrington		Volume 5			
98			98	N		
			Volume 4		1	
97	August 5, 2025, DA Activation Order 004-25 12406	ECF 140-1, Ex.		Y		
96	Camarillo Video [2]	O ECF 127-6, Ex. P		Y		
95	Camarillo Video [1]	M ECF 127-6, Ex.		Y		
94	Camarillo Photograph [13]	ECF 127-6, Ex.		Y		
93	Camarillo Photograph [12]	ECF 127-6, Ex.		Y		
92	Camarillo Photograph [11]	ECF 127-6, Ex.		Y		
91	Camarillo Photograph [10]	ECF 127-6, Ex. J		Y		
90	Camarillo Photograph [9]	H ECF 127-6, Ex. I		Y		
89	Camarillo Photograph [8]	G ECF 127-6, Ex.		Y		
88	Camarillo Photograph [7]	F ECF 127-6, Ex.		Y		
87	Camarillo Photograph [6]	E ECF 127-6, Ex.		Y		
86	Camarillo Photograph [5]	D ECF 127-6, Ex.		Y		
85	Camarillo Photograph [4]	C ECF 127-6, Ex.		Y		
84	Camarillo Photograph [3]	ECF 127-6, Ex.		Y		
	Camarillo Photograph [2]	ECF 127-6, Ex. B		Y		

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1				1		
1 2	102	Defendants' Objections and Responses to Plaintiffs' First Set of Interrogatories to Defendants		Y		
3	103	Amici Curiae Brief of Former U.S. Army and Navy		N		
4		Secretaries and Retired Four- Star Admirals and Generals				
5	104	News Article: Watson & Weber, What to Know About the Troops and Federal Agents in LA's		N		
7		MacArthur Park, Associated Press (July 7, 2025), https://tinyurl.com/mvsjm34 m				
8	105	News Article: L.A. Area Chamber Urges Calm and		N		
9		Calls for De-escalation Amid Immigration Raids (June 9, 2025), https://tinyurl.com/3y3krbcz.				
11	106	News Article: Jill Cowan and Mimi Dwyer, Federal		N		
12		Agents March Through L.A. Park, Spurring Local Outrage, N.Y. Times (July 7,				
13		2025), https://tinyurl.com/ye6dvrec				
1415	107	Anabel Munoz, Bystanders confront federal immigration agents as they descend on MacArthur Park, ABC 7		N		
16		News (July 7, 2025), https://tinyurl.com/4pcr4smp				
17	108	News Article: Levi Sumagaysay & Lauren		N		
18		Hepler, From San Diego to the Bay Area, California restaurants are on edge over				
19 20		immigration raids, CalMatters (June 19, 2025), https://tinyurl.com/3mavha5				
21	109	9 News Article: Suhauna		N		
22		Hussain and Md Fazlur Rahman, California's				
23		economy is already getting hit by immigration raids, LA				
24	4.5	Times (July 30, 2025), https://tinyurl.com/2ukukjdd				
25	110	News Article: Javier Hasse, Glass House Shows Us Its New, Massive 355k Square		N		
26		Feet Cannabis Greenhouse, Forbes (Feb. 11, 2020), https://tiny4t.com/407BNa				
27		poor, any invoint 107 D134	L	l		1
28						

Case 3:25-cv-04870-CRB	Document 2	154	Filed 08/11/2	5 Page 9	of 12	
111 News Article: Mark Madler,			N			
Camarillo Tomato Farm Sells for \$93 Million, Los						
(Oct. 11, 2021),						
112 DoD Instruction No.			Y			
113 Declaration of Genevieve Flores-Haro ISO Plaintiffs	ECE 127 6 Ev. N		v			
Supp. PI., Camarillo Photograph [14]	ECF 127-0, Ex. N					
Dated: August 11, 2025			Respectfully	submitted,		
			ROB BONTA Attorney Gen	eral of Calif	ornia	
			MICHAEL L. N	NEWMAN		
					s General	
					neys Gene	eral
			BARBARA HO	RNE-PETERS		
			JANE REILLEY	7	3	
			MEGHAN H. S	TRONG		
				•	1	
			Deputy Attor	ney General		
Dated: August 11, 2025			Respectfully	submitted,		
			RRETT A SI	HIMATE		
			Assistant Atto	orney Genera	al	
					y General	
			Federal Progr	ams Branch	£'	
			•	,		
	News Article: Mark Madler, Camarillo Tomato Farm Sells for \$93 Million, Los Angeles Business Journal (Oct. 11, 2021), https://tiny4t.com/8XzmxN 112 DoD Instruction No. 3025.21, Public 113 Declaration of Genevieve Flores-Haro ISO Plaintiffs Supp. Pl., Camarillo Photograph [14] Dated: August 11, 2025	111 News Article: Mark Madler, Camarillo Tomato Farm Sells for \$93 Million, Los Angeles Business Journal (Oct. 11, 2021), https://tiny4t.com/8XzmxN 112 DoD Instruction No. 3025.21, Public 113 Declaration of Genevieve Flores-Haro ISO Plaintiffs Supp. Pl., Camarillo Photograph [14] Dated: August 11, 2025	111 News Article: Mark Madler, Camarillo Tomato Farm Sells for \$93 Million, Los Angeles Business Journal (Oct. 11, 2021), https://tiny4t.com/8XzmxN 112 DoD Instruction No. 3025.21, Public 113 Declaration of Genevieve Flores-Haro ISO Plaintiffs Supp. PI., Camarillo Photograph [14] Dated: August 11, 2025	News Article: Mark Madler, Camarillo Tomato Farm Sells for \$93 Million, Loo Sangeles Business Journal (Oct. 11, 2021), https://iny4t.com/8XzmxN	News Article: Mark Madler, Camarillo Tomato Farm Sells for 593 Million, Los Angeles Business Journal (Oct. 11, 2021), https://tiny4.com/8XzmxN Y Dol Instruction No. 3025.21, Public Dol Instruction No. 3025.21, Public Photograph (14) ECF 127-6, Ex. N Y	News Article: Mark Madler, Camarillo Tomato Farm N

	Case 3:25-cv-04870-CRB	Document 154	Filed 08/11/25	Page 10 of 12
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CERTIFICATE OF SERVICE

Case Name:	Newsom v. Trump	No.	3:25-cv-04870-CRB	

I hereby certify that on <u>August 11, 2025</u>, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

JOINT EXHIBIT LIST

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

I further certify that some of the participants in the case are not registered CM/ECF users. On <u>August 11, 2025</u>, I have caused to be mailed in the Office of the Attorney General's internal mail system, the foregoing document(s) by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within three (3) calendar days to the following non-CM/ECF participants:

David A. Carrillo	Arman Matevosyan
California Constitution Center	The Matevosyan Law Firm
University of California, Berkeley	313 E. Broadway #10086
School of Law #7200	Glendale, CA 91209
Berkeley, CA 94720-7200	
State of Delaware	State of Washington
Delaware Department of Justice	Washington State Attorney General's Office
820 N. French Street	800 Fifth Avenue
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	Seattle, WA 98104
Brandon V. Stracener	Blue Eagle Coalition
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University of California, Berkeley	Redwood City, CA 94065
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Berkeley, CA 94720-7200	

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on <u>August 11</u>, <u>2025</u>, at San Francisco, California.

M. Paredes
Declarant

Signature

SF2025303707 44752155.docx