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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

1776 PROJECT FOUNDATION,

Plaintiff,

v.

ALBERTO M. CARVALHO, Superintendent of the Los Angeles Unified School District (LAUSD), SCOTT SCHMERELSON, President of the Los Angeles Unified School District (LAUSD) Board of Education, and BOARD OF EDUCATION OF THE LOS ANGELES UNIFIED SCHOOL DISTRICT,

Case No. 2:26-cv-00548-HDV-AGR

NOTICE OF MOTION AND MOTION TO INTERVENE AS DEFENDANTS

District Judge: Hon. Hernán D. Vera
Magistrate Judge: Hon. Alicia G. Rosenberg

Hearing Date: July 30, 2026
Hearing Time: 10:00 AM
Courtroom: 5B
Judge: Hernán D. Vera

Defendants,

A.M., a minor by and through their parent and next of kin Niglmoro Okuk; E.H., a minor by and through their parent and next of kin Latonya Huey.

Proposed Defendant-Intervenors.

TO THE COURT AND ALL INTERESTED PARTIES:

PLEASE TAKE NOTE THAT on July 30, 2026, at 10:00 AM, or as soon thereafter as this motion may be heard in Courtroom 5b, 5th Floor of the above-titled Court, located at 350 W. 1st St. Los Angeles, CA 90012, proposed Defendant-Intervenors move this Court for leave to intervene in the present action. Under Federal Rule of Civil Procedure 24, Niglmoro Okuk on behalf of her minor child, A.M.; and Latonya Huey on behalf of her minor child, E.H. (collectively, "Defendant-Intervenors"), the parents of Black students who attend magnet programs or public schools designated as Predominantly Hispanic, Black, Asian or Other Non-Anglo in Los Angeles Unified School District ("LAUSD" or the "District"), motion this Court to intervene as of right under Federal Rule of Civil Procedure 24(a), or in the alternative under Federal Rule of Civil Procedure 24(b), permissive intervention.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the accompanying declarations of

Niglomoro Okuk, Layona Huey, and Ariana Rodriguez, all papers on file in this action, and any evidence or oral argument offered at any hearing on this motion.

In compliance with Local Rule 7-3, Defendant-Intervenors notified 1776 Project Foundation Plaintiffs, Plaintiff-Intervenor United States, and Defendant LAUSD on May 21, 2026, regarding their anticipated intervention, and convened a conference on May 29, 2026, where the parties discussed the substance of the intervention motion. The parties were unable to reach a resolution, and Defendant-Intervenors advised the parties that they intended to file their Motion to Intervene by June 5, 2026.

Dated: June 5, 2026

Respectfully Submitted,
AMERICAN CIVIL LIBERTIES UNION & ACLU OF SOUTHERN CALIFORNIA

/s/ *Ariana Rodriguez*
Ariana Rodriguez

Counsel for proposed Defendant-Intervenors