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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

1776 PROJECT FOUNDATION, Plaintiff, UNITED STATES OF AMERICA, Plaintiff-Intervenor, 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	Case No. 2:26−CV−00548−HDV−CTSx **[PROPOSED] NOTICE OF MOTION AND MOTION OF DEFENDANT-INTERVENORS' MOTION TO DISMISS** District Judge: Hon. Hernán D. Vera Magistrate Judge: Hon. Christina T. Shay Hearing Date: Sept. 24, 2026 Hearing Time: 10:00 a.m.

BOARD OF EDUCATION OF THE LOS ANGELES UNIFIED SCHOOL DISTRICT,

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.

Courtroom: 5B
Judge: Hernán D. Vera

TO THE COURT AND ALL INTERESTED PARTIES:

PLEASE TAKE NOTE THAT on September 24, 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, 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") move this Court to dismiss the present action under *Younger v. Harris*, 401 U.S. 37 (1971).

This motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the accompanying declaration of Jonathan D. Newton, the Request for Judicial Notice, 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, Proposed Defendant-Intervenors, 1776 Project Foundation Plaintiffs, Plaintiff-Intervenor United States, and Defendant LAUSD convened a conference on June 15, 2026, where they discussed

the substance of LAUSD's Motion to Dismiss and Proposed Defendant-Intervenors' proposed Motion to Dismiss. The parties were unable to reach a resolution, and Proposed Defendant-Intervenors advised the parties that they intended to file their proposed Motion to Dismiss by June 22, 2026.

Dated: June 22, 2026

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

Jonathan D. Newton

Counsel for Proposed Defendant-Intervenors