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9 Attorneys for Plaintiff
10 CALIFORNIA POLICY CENTER, INC.

11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 CALIFORNIA POLICY CENTER, INC.

15 Plaintiff,

16 v.

17 LILIA GARCIA-BROWER, *in her official*
18 *capacity as the Labor Commissioner in*
the Division of Labor Standards
19 *Enforcement of the California*
Department of Industrial Relations,

20
21
22
23 Defendant.
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Case No. 8:25-cv-00271

**NOTICE OF MOTION FOR
PRELIMINARY INJUNCTION**

**ACTION SEEKING STATEWIDE
OR NATIONWIDE RELIEF**

[Filed concurrently with Memorandum
of Points and Authorities, Declaration
of Will Swaim, and [Proposed] Order]

Date: April 18, 2025

Time: 1:30 p.m.

Crtrm.: 6A

1 TO THE COURT, THE CLERK, AND DEFENDANT AND HER COUNSEL
2 OF RECORD:

3 PLEASE TAKE NOTICE that on Friday, April 18, 2025, at 1:30 p.m. or as
4 soon thereafter as the matter may be heard in Courtroom 6A, before the Honorable
5 Michelle Williams Court, at the First Street Courthouse on the 6th Floor, 350 W. 1st
6 Street, Los Angeles, California, 90012.

7 Pursuant to Fed. R. Civ. P. 65, Plaintiff respectfully moves for a preliminary
8 injunction. As set forth in the attached memorandum of law, Plaintiff asks that this
9 Court enter an order enjoining Defendant from implementing and enforcing
10 California Senate Bill 399, the “California Worker Freedom from Employer
11 Intimidation Act,” Cal. Lab. Code § 1137.

12 This Motion is also based on the concurrently filed supporting Memorandum of
13 Points and Authorities, and the Declaration of Will Swaim, along with all
14 pleadings, documents, and files in this matter, and all matters of which this Court
15 may take judicial notice, and upon such other and further oral or other
16 documentary evidence as may be presented to the Court at or prior to the hearing
17 of this matter.

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19 Dated: February 21, 2025

20 Respectfully submitted,

21 **CALIFORNIA POLICY CENTER, INC.**

22 By: /s/ Julie Hamill

23 Attorneys for Plaintiff
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10 * motion for pro hac vice admission pending
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