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Attorneys for Defendant
CITY OF LOS ANGELES

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendant.

CASE NO. 2:20-cv-02291 DOC (KES)

Honorable David O. Carter,
United States District Judge

**DEFENDANT CITY OF
LOS ANGELES'S REQUEST FOR
CLARIFICATION REGARDING
NOVEMBER 19, 2025
EVIDENTIARY HEARING**

Action Filed: March 10, 2020

1 During today's hearing, the Court set an evidentiary hearing for November 19,
2 2025, for potential contempt sanctions against Defendant the City of Los Angeles.
3 Counsel for the City inquired multiple times during the hearing today about the scope of
4 the hearing on November 19—namely, the issues to be addressed and the bases for any
5 potential contempt sanctions. The Court invited the City to make that request in writing.

6 Accordingly, the City respectfully requests that the Court provide clarification
7 regarding the issues to be addressed at the evidentiary hearing scheduled for November
8 19. Establishing civil contempt requires proof by "clear and convincing evidence" of "a
9 party's disobedience to a *specific and definite court order* by failure to take all
10 reasonable steps within the party's power to comply." *In re Dual-Deck Video Cassette*
11 *Recorder Antitrust Litig.*, 10 F.3d 683, 695 (9th Cir. 1993) (emphasis added). Given
12 that the Court has stated that the evidentiary hearing concerns potential contempt
13 sanctions, the City is entitled at a minimum to know which order(s) the Court believes
14 that the City has failed to comply with, as well as which specific parts of those order(s),
15 so that it may prepare its defense in advance of the evidentiary hearing. Due process
16 likewise "requires that there be an opportunity to present every available defense,"
17 *Lindsey v. Normet*, 405 U.S. 56, 66 (1972), and that cannot be done unless the City
18 knows specifically what issues are to be addressed at the evidentiary hearing.

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20 DATED: November 12, 2025

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

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22 By: /s/ Theane Evangelis
23 Theane Evangelis

24 *Attorneys for Defendant*
25 *CITY OF LOS ANGELES*
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