

1 RITU MAHAJAN (SBN 252970)¹
rmahajan@publiccounsel.org
2 MARK ROSENBAUM (SBN 59940)
mrosenbaum@publiccounsel.org
3 AMANDA MANGASER SAVAGE (SBN 325996)
asavage@publiccounsel.org
4 **PUBLIC COUNSEL**
610 South Ardmore Ave.
5 Los Angeles, CA 90005
Telephone: 213.385.2977

6 ARIANA E. FULLER (SBN 301797)
afuller@kslaw.com
7 JEANNE A. FUGATE (SBN 236341)
jfugate@kslaw.com
8 **KING & SPALDING LLP**
633 West Fifth Street, Suite 1600
9 Los Angeles, CA 90071
10 Telephone: 213.443.4355

11 MATTHEW T. HEARTNEY (SBN 123516)
matthew.heartney@arnoldporter.com
12 DANIEL SHIMELL (SBN 300931)
daniel.shimell@arnoldporter.com
13 **ARNOLD & PORTER LLP**
777 South Figueroa Street, 44th Floor
14 Los Angeles, CA 90017-5844
15 Telephone: 213.243.4000

16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 A.M., A.P., L.C., INLAND COALITION
20 FOR IMMIGRANT JUSTICE,

21 Plaintiffs,

22 v.

23 CITY OF FONTANA and 4LEAF, INC.,

24 Defendants.

Case No. 5:25-cv-02092-SSS-SP

**PLAINTIFFS' SUPPLEMENTAL
BRIEF IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION**

Date: September 11, 2026

Time: 2:00 p.m.

25
26
27
28 ¹ Due to space limitations, all attorneys of record for Plaintiffs are listed in full in the signature of this document.

TABLE OF CONTENTS

	Page(s)
I. INTRODUCTION	- 4 -
II. LEGAL STANDARD	- 5 -
III. ARGUMENT	- 6 -
A. Defendants Have Directly Interfered with ICIJ's Core Business Activities	- 6 -
B. <i>Hippocratic Medicine</i> and <i>Arizona Alliance</i> Only Confirm ICIJ's Organizational Standing	- 9 -
IV. CONCLUSION	- 13 -

TABLE OF AUTHORITIES

Page(s)

Cases

<i>Arizona Alliance for Retired Americans v. Mayes</i> , No. 22-16490, 2026 WL 2277101 (9th Cir. Aug. 7, 2026).....	2, 7, 8, 9, 10, 11
<i>CASA de Maryland, Inc. v. Trump</i> , 971 F.3d 220 (4th Cir. 2020)	10
<i>E. Bay Sanctuary Covenant v. Biden</i> , 993 F.3d 640 (9th Cir. 2021)	3
<i>Food & Drug Admin. v. All. for Hippocratic Med.</i> , 602 U.S. 367 (2024).....	3, 4, 5, 6, 7, 9, 10
<i>Havens Realty Corp. v. Coleman</i> , 455 U.S. 363 (1982).....	3, 5, 7
<i>Hunt v. Wash. State Apple Advert. Comm’n</i> , 432 U.S. 333 (1977).....	2
<i>L.T., et al., v. United States Immigr. & Customs Enf’t, et al.</i> , No. 5:26-CV-00322-SSS-SPX, 2026 WL 2338452 (C.D. Cal. Aug. 12, 2026) ..	2
<i>Village of Arlington Heights v. Metropolitan Housing Corp.</i> 429 U.S. 252 (1977).....	7

Other Authorities

First, Fourth, and Fourteenth Amendments	2
--	---

1 **I. INTRODUCTION**

2 Plaintiffs A.M., A.P., L.C., and Inland Coalition for Immigrant Justice (“ICIJ”)
3 (collectively, “Plaintiffs”) seek a preliminary injunction to protect their rights under
4 the First, Fourth, and Fourteenth Amendments and California law, and to prevent
5 irreparable injury caused by Defendants City of Fontana (“the City”) and 4LEAF, Inc.
6 (“4LEAF”) (collectively, “Defendants”). Plaintiffs seek to enjoin Defendants from
7 enforcing the challenged provisions—FMC §§ 1-14, 15-820(a)(9)(14), 15-820(b), 15-
8 828, 15-829(b)(1)-(6), 15-828(8)-(9), and 15-829(c)—from unconstitutionally
9 seizing, impounding, and destroying sidewalk vendor’s property, and from continuing
10 their campaign to expel sidewalk vendors from the City of Fontana.

11 On August 12, 2026, the Court ordered supplemental briefing addressing the
12 impact of the Ninth Circuit’s *en banc* decision in *Arizona Alliance for Retired*
13 *Americans v. Mayes*, No. 22-16490, 2026 WL 2277101 (9th Cir. Aug. 7, 2026) on
14 ICIJ’s organizational standing. Dkt. No. 126. *Arizona Alliance* confirms that this
15 Court was correct in its previous determination that Plaintiff ICIJ has organizational
16 standing for all its claims.² Organizational standing exists where a defendant’s
17 conduct “directly affect[s] and interfere[s] with [an organization’s] core business
18 activities.” *Id.* at *2. As this Court has already found, Defendants’ conduct has
19 obstructed ICIJ’s ability to provide services and driven vendors from Fontana,
20 directly interfering with ICIJ’s core business activities and preventing it from doing
21

22 ² The Ninth Circuit’s decision also reaffirmed that organizations may assert
23 associational standing on behalf of their members. *Id.* at *4 n.1 (9th Cir. Aug. 7,
24 2026) (citing *Hunt v. Wash. State Apple Advert. Comm’n*, 432 U.S. 333, 342-43
25 (1977)). As this Court has previously determined, Plaintiff ICIJ has associational
26 standing for all its claims, Second MTD Order at 6-7, and Plaintiffs’ supporting
27 evidence further confirms that conclusion. *See, e.g.*, Declaration of Javier Hernandez
28 (“Hernandez Decl.”) (Dkt. No. 100-1) ¶¶ 45-49. The Court may end its inquiry there.
See L.T., et al., v. United States Immigr. & Customs Enf’t, et al., No. 5:26-CV-00322-
SSS-SPX, 2026 WL 2338452, at *13 (C.D. Cal. Aug. 12, 2026) (“The Court need not
reach organizational standing because [ICIJ] has established associational
standing.”).

1 what it was formed to do—to serve sidewalk vendors. *See* Dkt. No. 85, Order
2 Denying Defendants’ Motions to Dismiss and Motions to Strike (“Second MTD
3 Order”) at 5-7. Accordingly, ICIJ has organizational standing to pursue all its claims
4 asserted in this action.

5 **II. LEGAL STANDARD**

6 Organizations have standing to “sue on their own behalf for injuries they have
7 sustained.” *Food & Drug Admin. v. All. for Hippocratic Med.*, 602 U.S. 367, 393
8 (2024) (quoting *Havens Realty Corp. v. Coleman*, 455 U.S. 363, 379 (1982)). In
9 *Hippocratic Medicine*, the Supreme Court reaffirmed that organizational standing
10 exists where a defendant’s conduct “perceptibly impair[s]” an organization’s ability
11 to carry out its “core business activities.” *Id.* at 395 (quoting *Havens*, 455 U.S. at
12 379).

13 In *Arizona Alliance*, the Ninth Circuit clarified the standard for organizational
14 standing in light of *Hippocratic Medicine*. *Arizona All.*, 2026 WL 2277101. The
15 Ninth Circuit emphasized that the central inquiry for organizational standing purposes
16 is whether a defendant’s conduct “directly affect[s] and interfere[s] with [an
17 organizational plaintiff’s] core business activities.” *Id.* at *6 (citing *Hippocratic
18 Medicine*, 602 U.S. at 395). Importantly, “a ‘direct’ effect does not mean . . . that an
19 organizational plaintiff must be directly regulated by a challenged law.” *Id.*; *see*
20 *Hippocratic Med.*, 602 U.S. at 384 (“the Court has identified a variety of familiar
21 circumstances where government regulation of a third-party individual or business
22 may be likely to cause injury in fact to an unregulated plaintiff.”).

23 Applying that framework, the Ninth Circuit overruled the organizational
24 standing analyses contained in a series of prior cases in which it had found that “an
25 organization has direct standing to sue where it establishes that the defendant’s
26 behavior has frustrated its mission and caused it to divert resources in response to that
27 mission.” *Id.* at *7 (quoting *E. Bay Sanctuary Covenant v. Biden*, 993 F.3d 640, 663
28 (9th Cir. 2021). It reasoned that, while “a diversion of resources may be evidence of

1 an injury,” it “is not itself an injury-in-fact.” *Id.* Instead, organizational standing
2 turns on “whether the challenged conduct ‘directly affected and interfered with’ the
3 plaintiff organizations’ core activities.” *Id.* at 7 (citing *Hippocratic Med.*, 602 U.S.
4 at 395). As a result, the frustration of an organization’s mission and the resulting
5 expenditure of resources constitute a concrete and particularized injury only when
6 that frustration stems from conduct that “directly affect[s] and interfere[s] with [its]
7 core business activities.” *Id.* at *6 (citing *Hippocratic Medicine*, 602 U.S. at 395).

8 **III. ARGUMENT**

9 The Ninth Circuit’s ruling in *Arizona Alliance* confirms the Court’s
10 determination that ICIJ has organizational standing for all its claims. ICIJ’s injury
11 arises from Defendants’ direct interference with ICIJ’s core business activities. *See*
12 *Hippocratic Med.*, 602 U.S. at 395 (organizational standing exists where challenged
13 conduct “directly affect[s] and interfere[s] with” an organization’s core activities);
14 *Arizona All.*, 2026 WL 2277101, at *7 (same). Defendants’ conduct shut down ICIJ’s
15 ability to carry out its core activities in Fontana, which is precisely the type of
16 “concrete and demonstrable injury” to an organization’s activities recognized in
17 *Havens*, 455 U.S. at 379, and reaffirmed by both *Hippocratic Medicine* and *Arizona*
18 *Alliance*.

19 **A. Defendants Have Directly Interfered with ICIJ’s Core Business** 20 **Activities**

21 Defendants’ policies and practices have “directly affected and interfered with”
22 ICIJ’s ability to carry out its “core business activities,” *Hippocratic Med.*, 602 U.S.
23 at 395, by expelling nearly all sidewalk vendors from Fontana. By design, Defendants
24 have driven nearly all sidewalk vendors from Fontana, thereby eliminating the very
25 community ICIJ exists to serve. *See* Hernandez Decl. ¶¶ 41-4 (describing how
26 Defendants’ conduct drove vendors from Fontana), ¶¶ 29-30 (describing Defendants’
27 enforcement practices designed to intimidate sidewalk vendors). “Fear of harsh
28 enforcement, impoundment, intimidation, and harassment discouraged community

1 members from participating in ICIJ activities.” *Id.* ¶ 42. A.M.’s experiences are
2 illustrative. While “[she] would love to vend in Fontana again because that is where
3 [her] home is,” the City and 4LEAF have made this impossible. Declaration of A.M.
4 (“A.M. Decl.”) (Dkt. No. 96-9) ¶ 4. Indeed, “when [A.M.] was vending in Fontana,
5 [she] would cry often because they would treat [her] like an animal.” *Id.* ¶ 10. Thus,
6 as a result:

7 Vendors were forced to relocate to other cities and unincorporated areas of
8 the county to avoid the harassment and repeated destruction of their food
9 and equipment. By the end of 2023, most of the vendors ICIJ served in
10 Fontana had been driven out of the City. As of early 2026, nearly *all*
11 vendors have been expelled from Fontana and only a handful of sidewalk
12 businesses remain.

13 Hernandez Decl. ¶ 43. The consequences for ICIJ were devastating. “Because the
14 City and 4LEAF expelled nearly all sidewalk vendors from Fontana, attendance at
15 ICIJ’s programs sharply declined. ICIJ had to cancel clinics, workshops, and outreach
16 events because there were no longer vendors in Fontana to serve.” *Id.* ¶ 41. Nor was
17 this result accidental. It was the intended outcome of the City and 4LEAF’s
18 coordinated campaign to, in the Mayor’s words, “grab some hammers” and “[get rid
19 of] illegal [vendors].” *Id.* ¶ 28, 6; *see also id.* ¶ 29 (4LEAF officers regularly “tell
20 vendors they have no right to vend and must leave”); *see also* Second Amended
21 Complaint (“SAC”), Dkt. No. 65 ¶ 7.

22 The facts here present a textbook *Havens* injury. Because of Defendants’
23 conduct, ICIJ was unable to serve the very population it was founded to serve. *See*
24 *Havens*, 455 U.S. at 379; *Hippocratic Med.*, 602 U.S. at 395. In *Havens*, the
25 organizational plaintiff Housing Opportunities Made Equal (“HOME”) alleged that
26 that defendants’ racial steering practices impaired its core business activities of
27 “provid[ing] counseling and referral services for low-and moderate income
28 homeseekers.” *Havens*, 455 U.S. at 379. The Supreme Court held that such
interference provided organizational standing even though “the challenged conduct

1 did not entirely prevent HOME from providing its counseling and referral services.”
2 *Id.* Here, Defendants’ conduct has done far more. Defendants’ conduct *has* “entirely
3 prevented” ICIJ from providing its services to sidewalk vendors in Fontana, because
4 these vendors no longer exist.³

5 Even before Defendants drove vendors from Fontana entirely, Defendants
6 directly interfered with ICIJ’s ability to provide permit assistance, trainings, and other
7 direct services. Hernandez Decl. ¶¶ 33-34, 38. The City obstructed ICIJ’s efforts to
8 provide accurate advice by imposing impossible and confusing requirements, even
9 telling ICIJ and vendors that “no permits were available and there was nothing to do.”
10 *Id.* ¶¶ 33-34. ICIJ staff were forced to make “repeat trips to the permit office”
11 because “[t]he City gave ICIJ members false and inconsistent information.” *Id.* ¶ 34.
12 And the EOC Provision’s vagueness prevented ICIJ from educating vendors about
13 their legal rights. *Id.* ¶ 38. When vendors sought advice about the EOC Provision,
14 and what the law meant and what they were allowed to do, ICIJ staff were forced to
15 “tell them, ‘we don’t know what it means.’” *Id.* Defendants thus did not simply
16 frustrate ICIJ’s mission in the abstract. They “directly affect[ed] and interfere[d]
17 with” ICIJ’s core business activities by preventing it from providing effective permit
18 assistance, trainings, and other direct services to sidewalk vendors. *Arizona All.*, 2026
19 WL 2277101, at *7 (citing *Hippocratic Med.*, 602 U.S. at 395); *see* Hernandez Decl.
20 ¶¶ 33-34, 38. This is directly analogous to the facts in *Haven*. There, the plaintiff
21 organization’s ability to provide housing and counseling services was “perceptibly

22
23 ³ The City’s contention that ICIJ’s “services are not limited to Fontana”
24 misunderstands the law. *See* Defendant City of Fontana’s Opposition to Plaintiffs’
25 Motion for Preliminary Injunction (“City PI Opposition”) (Dkt. No. 101) at 13. In
26 *Havens Realty*, the organizational plaintiff HOME provided counseling and referral
27 services throughout the broader housing market in “the Richmond Metropolitan
28 Area,” not solely with respect to properties owned by defendant Havens Realty. 455
U.S. at 368. Plaintiff HOME’s ability to continue providing services in other
locations did not negate that Havens Realty’s discriminatory practices impaired
HOME’s ability to carry out those activities. 455 U.S. at 379. Likewise, ICIJ’s
continued operations outside of Fontana do not defeat standing.

1 impaired” by the defendant’s provision of false and misleading information regarding
2 apartment availability. *Havens Realty* at 379; *see also Hippocratic Med.*, 602 U.S. at
3 395 (affirming that dissemination of “false information . . . perceptibly impaired
4 [plaintiff’s] ability to provide counseling and referral services” and constitutes action
5 that directly affects and interferes with core business activities.”). The same is true
6 here. Even before Defendants expelled sidewalk vendors altogether, they
7 “‘perceptibly impaired’ ICIJ’s ability to provide direct services” to vendors. Second
8 MTD Order at 5.

9 Similarly, ICIJ closely resembles the plaintiff organization from *Village of*
10 *Arlington Heights v. Metropolitan Housing Corp.* 429 U.S. 252 (1977), which the
11 Ninth Circuit examined in *Arizona Alliance* as an example of a plaintiff with
12 organizational standing. *See Arizona All.*, 2026 WL 2277101, at *5 (discussing
13 *Village of Arlington Heights* as an early instance of the Supreme Court’s recognition
14 that “[e]ffects on an entity’s core business activities” constitute “concrete and
15 particularized injuries”). There, the plaintiff organization challenged a denial of a
16 rezoning application, which stood “as an absolute barrier” to constructing contracted
17 housing in service of its mission. *Id.* at 261, 263. Such an absolute barrier more than
18 sufficed for standing. *Id.* at 261. So, too, here. ICIJ is not doing “more of the [] work
19 [it] [was] created to do”—to the contrary, it has been rendered unable to do any work
20 with Fontana vendors. *Arizona All.*, 2026 WL 2277101, at *18 (Bress, J., concurring).

21 **B. *Hippocratic Medicine* and *Arizona Alliance* Only Confirm ICIJ’s**
22 **Organizational Standing**

23 The Supreme Court’s analysis in *Hippocratic Medicine* and the Ninth Circuit’s
24 analysis in *Arizona Alliance* only confirm that ICIJ has organizational standing, as
25 ICIJ bears no resemblance to the plaintiff organizations found to lack standing in
26 either case. In *Hippocratic Medicine*, four medical organizations challenged the
27 FDA’s relaxation of regulatory requirements for mifepristone. 602 U.S. at 372–73,
28 376. The organizations argued that they suffered injury because they incurred costs

1 opposing the FDA’s actions, including conducting research regarding mifepristone’s
2 risks and engaging in public advocacy and education. *Id.* The Supreme Court rejected
3 that theory, holding that an organization cannot “manufacture its own standing”
4 merely by choosing to expend resources in response to government action. *Id.* at 394.
5 Otherwise, “organizations could spend their way to standing in challenges based
6 solely on ideological opposition.” *Arizona All.*, 2026 WL 2277101, at *7 (citing
7 *Hippocratic Med.*, 602 U.S. at 394-95). That concern has no bearing here. ICIJ does
8 not rely on a diversion-of-resources theory.⁴ Instead, it has consistently demonstrated
9 that Defendants’ conduct directly affected and interfered with its core business
10 activities of providing direct services to sidewalk vendors. *See discussion supra* pp.
11 4-7; Hernandez Decl. ¶¶ 33-34, 38, 41-44; Second MTD Order at 5-6.

12 Nor does *Arizona Alliance* aid Defendants. There, three organizations
13 challenged a state regulation requiring county recorders to cancel a voter’s
14 registration in that county if the voter moves and registers in a new county. *Arizona*
15 *All.*, 2026 WL 2277101 at *1. The Ninth Circuit rejected the organizations’ primary
16 theory of direct interference with their voter-registration activities, because it
17 depended on the unfounded speculation that voters “might have their new
18 registrations canceled.” *Id.* at *8. Once that unfounded premise fell away, the
19 organizations were left only with claims that they needed to spend additional time and
20 resources assisting voters with registration issues and educating and training the
21 public regarding the law’s effects. *Id.* Those claims, however, amount to mere
22 resource diversion and not interference with the organizations’ core activities. As the
23 Ninth Circuit explained, the plaintiff organizations failed to show—as required—that
24 the challenged law actually “affects or interferes with their core activities.” *Id.* at *8.
25 Here, by contrast, ICIJ has done exactly what is required. It has clearly shown—with

26
27 ⁴ ICIJ’s attempt to blunt Defendants’ harms by increasing its resources to Fontana
28 before vendors were fully expelled does not negate ICIJ’s organizational standing.
See, e.g., Arizona All., 2026 WL 2277101, at *7 (“a diversion of resources may be
evidence of an injury”).

1 extensive, undisputed evidence—that Defendants’ conduct directly “affects or
2 interferes with” its core activities. *Id.* First, Defendants’ misinformation, permit
3 requirements, and laws and policies obstructed ICIJ’s ability to provide direct services
4 to sidewalk vendors. Hernandez Decl. ¶¶ 33-34, 38. Second, Defendants succeeded
5 in expelling nearly the entire sidewalk vending community from Fontana, causing
6 attendance at ICIJ programs to collapse and leaving ICIJ unable to carry out its core
7 business activities altogether. *Id.* ¶¶ 41-43. Under *Hippocratic Medicine* and *Arizona*
8 *Alliance*, that is more than sufficient to establish organizational standing.

9 Finally, to the extent that the standard for organizational standing articulated in
10 Judge Bress’ concurring opinion differs from the majority, ICIJ satisfies that standard
11 as well. *See Arizona All.*, 2026 WL 2277101, at *14-22 (Bress, J., concurring). As
12 Judge Bress explains, organizational standing does not require that a challenged law
13 directly regulate the organization itself, because “a law may regulate third parties yet
14 may directly affect the organization’s core business activities.” *Id.* at *18. There, the
15 flaw in the plaintiffs’ theory was that the challenged voting regulation did not
16 “regulate voters in a way that would directly injure the organizations as
17 organizations,” unlike, for example, a law “that disallowed voters from speaking with
18 public interest organizations.” *Id.* at *17. Most importantly, Judge Bress concluded
19 that the challenged voting regulation “does not impede the plaintiff organizations’
20 functioning, but simply requires them to do more of the advocacy work they were
21 created to do.” *Id.* at *18. For that reason, the plaintiff organizations had not suffered
22 the type of injury necessary for organizational standing.

23 The present case is fundamentally different and fits well within Judge Bress’s
24 articulation of the standard for organizational standing. Here, Defendants’ conduct
25 has not required ICIJ to “do more” of its work. Rather, it has impeded ICIJ’s
26 functioning and ultimately rendered its core business activities in Fontana impossible.
27 Under Judge Bress’s formulation, organizational standing exists where a defendant’s
28 actions “imped[e] the organization from doing the very thing it [is] supposed to do.”

1 *Id.* That is precisely what happened here. ICIJ exists to serve and support sidewalk
2 vendors. Defendants’ conduct not only interfered with ICIJ’s ability to provide those
3 services, but ultimately eliminated the very community ICIJ was formed to serve
4 within Fontana. Far from requiring ICIJ to “do more” of its work, Defendants’
5 conduct has prevented ICIJ from doing that work at all. By obstructing ICIJ’s ability
6 to provide services and driving vendors from Fontana, Defendants directly interfered
7 with ICIJ’s core business activities and hindered “its ability to *function*.” *Id.* at *16
8 (quoting *CASA de Maryland, Inc. v. Trump*, 971 F.3d 220, 239 (4th Cir. 2020); *see*
9 *discussion supra* pp. 4-7.

10 In short, as this Court previously determined, Defendants have “prevent[ed]
11 ICIJ from being able to continue [its] business activities in a meaningful manner.”
12 Second MTD Order at 6. The evidentiary record submitted in support of Plaintiffs’
13 Motion for Preliminary Injunction only reinforces that conclusion. Moreover, this
14 Court’s reasoning in making that determination tracks the standards articulated by the
15 Supreme Court in *Hippocratic Medicine* and the Ninth Circuit in *Arizona Alliance*,
16 relying on none of the cases whose organizational standing analyses were recently
17 overruled. As this Court explained:

18 To demonstrate organizational standing, ICIJ must be able to demonstrate
19 that Defendants “perceptibly impaired” ICIJ’s ability to provide direct
20 services—“not dissimilar to a retailer who sues a manufacturer for selling
21 defective goods to the retailer.” *Hippocratic Medicine*, 602 U.S. at 395
22 (citing *Havens Realty Corp. v. Coleman*, 455 U.S. 363, 368–379 (1982)).
23 Here, the SAC does so. The SAC specifies that ICIJ’s activities includes
24 “assist[ing] vendors with permit applications,” “help[ing] vendors respond
25 to citations, impoundments, and enforcement actions,” and “fundrais[ing]
26 for and distribut[ing] grants to vendors, including . . . funds to pay for
27 permits.” [SAC¶ 167]. Accepting these factual allegations as true, ICIJ
28 more resembles the plaintiffs in *Havens Realty* than those in *Hippocratic Medicine*. Like in *Havens Realty*, ICIJ suffers concrete and demonstrable injury to its activities—with a consequent drain on its resources—due to Defendants’ practices relating to confiscation of goods and denial of permits. Such an injury to ICIJ is “far more than simply a setback to the organization’s abstract social interests.” *Havens Realty*, 455 U.S. at 379. It

1 prevents ICIJ from being able to continue their business activities in a
2 meaningful manner. That is an injury more extensive than mere diversion
3 of resources. Based on the current pleadings, the Court finds ICIJ has
demonstrated organizational standing.

4 Second MTD Order at 5-6. This Court's finding of organizational standing was
5 correct when issued and remains correct today. Since the Court made its finding,
6 Plaintiffs have only strengthened their showing with additional substantiating
7 evidence. And *Arizona Alliance* reinforces that ICIJ has suffered precisely the type
8 of injury—direct interference with its core business activities—required for
9 organizational standing.

10 **IV. CONCLUSION**

11 For the foregoing reasons, and for the reasons set forth in Plaintiffs' Motion for
12 Preliminary Injunction and the accompanying Memorandum of Points and
13 Authorities, the declarations and all exhibits in support of the same, including
14 attachments, all pleadings, and all other papers on file in this action, and all oral and
15 documentary evidence that may be presented at the time of the hearing, Plaintiffs
16 respectfully request that the Court grant Plaintiffs' Motion for Preliminary Injunction.

17
18 [SIGNATURE PAGE FOLLOWS]
19
20
21
22
23
24
25
26
27
28

August 28, 2026

PUBLIC COUNSEL

By: /s/ Ritu Mahajan

Ritu Mahajan (SBN 252970)
rmahajan@publiccounsel.org
Mark Rosenbaum (SBN 59940)
mrosenbaum@publiccounsel.org
Amanda Mangaser Savage (SBN
325996)
asavage@publiccounsel.org
Cassidy J. Bennett (SBN 347811)
cbennett@publiccounsel.org
Elizabeth R. Brown (SBN 360601)
ebrown@publiccounsel.org
Jacob Maddox (SBN 354368)
jmaddox@publiccounsel.org
Brittnee Bui (SBN 333372)
bbui@publiccounsel.org
610 South Ardmere Ave.
Los Angeles, CA 90005
Telephone: 213.385.2977

Respectfully submitted,

KING & SPALDING LLP

By: 

Ariana E. Fuller (SBN 301797)
afuller@kslaw.com
Arwen R. Johnson (SBN 247583)
arwen.johnson@kslaw.com
Jeanne A. Fugate (SBN 236341)
jfugate@kslaw.com
633 West Fifth Street, Suite 1600
Los Angeles, CA 90071
Telephone: 213.443.4355

ARNOLD & PORTER LLP

By: /s/ Matthew T. Heartney

Matthew T. Heartney (SBN 123516)
matthew.heartney@arnoldporter.com
Daniel Shimell (SBN 300931)
daniel.shimell@arnoldporter.com
Kathryn Campbell (SBN 350536)
katie.campbell@arnoldporter.com
Dania Qahoush (SBN 335202)
dania.qahoush@arnoldporter.com
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017-5844
Telephone: 213.243.4000

SIGNATURE ATTESTATION

Pursuant to L.R. 5-4.3.4(a)(2)(i), the undersigned, counsel of record for
Plaintiffs, hereby attests that all other signatories listed, on whose behalf the filing is
submitted, concur in the filing's content and have authorized the filing.

Dated: August 28, 2026

By: 

ARIANA E. FULLER