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13 Attorneys for Plaintiffs Lydia Olson, Miguel Perez,
 Postmates Inc., and Uber Technologies, Inc.

14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA

16 LYDIA OLSON, MIGUEL PEREZ,
 17 POSTMATES INC., and UBER
 TECHNOLOGIES, INC.,

18 Plaintiffs,

19 v.

20
 21 STATE OF CALIFORNIA; XAVIER
 22 BECERRA, in his capacity as Attorney
 General of the State of California; and
 23 "JOHN DOE," in his official capacity,

24 Defendants.
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CASE NO. 2:19-cv-10956-DMG-RAO

**NOTICE OF MOTION AND MOTION
 FOR PRELIMINARY INJUNCTION**

Judge: Hon. Dolly M. Gee
 Hearing Date: February 7, 2020
 Time: 2:00 P.M.

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on February 7, 2020 at 2:00 p.m., pursuant
3 Federal Rule of Civil Procedure 65(a), Plaintiffs move for a preliminary injunction
4 enjoining enforcement, pending final judgment, of any provision of California Assembly
5 Bill 5 (2019) against Plaintiffs by Defendant State of California, Defendant Attorney
6 General Xavier Becerra, his officers, agents, servants, employees, and attorneys, and all
7 other similarly situated state executive officials. The reasons for granting the motion
8 are set forth in the accompanying Memorandum in Support.

9 Plaintiffs request that bond be waived or that the court establish a nominal bond.
10 This Court may waive the security requirements set forth in Federal Rule of Civil
11 Procedure 65(c) or establish a nominal bond. *Barahona-Gomez v. Reno*, 167 F.3d 1228,
12 1237 (9th Cir. 1999). Moreover, the court may waive the bond requirement if imposing
13 a bond “would have a negative impact on plaintiff’s constitutional rights, as well as the
14 constitutional rights of other members of the public affected by the policy.” *Baca v.*
15 *Moreno*, 936 F. Supp. 719, 738 (C.D. Cal. 1996).

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18 Dated: January 8, 2020

By: /s/ Theane Evangelis

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20 Theane Evangelis
21 Joshua S. Lipshutz
22 Blaine H. Evanson
23 Heather L. Richardson
24 Dhananjay S. Manthripragada

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