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 10 *Development*

11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

16 **NEETA THAKUR, et al.,**

17
 18 Plaintiff,

19 v.

20 **DONALD J. TRUMP, et al.,**

21 Defendants.
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Case No: 3:25-cv-04737-RFL

Assigned to the Honorable Rita F. Lin

**DECLARATION OF KRISTI HUGHES
 IN SUPPORT OF ADMINISTRATIVE
 MOTION**

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DECLARATION OF KRISTI HUGHES

I, Kristi Hughes, hereby declare:

1. I have personal knowledge of the facts stated herein and, if called as a witness, would and could competently testify to the truth thereof.

2. I am an attorney licensed to practice law in the State of California and a Deputy Attorney General at the California Department of Justice. In that capacity, I represent the State of California and the California Governor’s Office of Business and Economic Development.

3. On Friday, February 27, 2026, a colleague in my office, Chris Kissel, contacted counsel for plaintiffs and defendants in the above-captioned matter to ask whether the parties would stipulate that this matter and another matter, *California et al. v. Wright et al.*, should be related. Mr. Kissel asked to receive a response by noon on Monday, March 2, 2026.

4. Plaintiffs responded the same day and informed that they were willing to enter the stipulation.

5. On the morning of March 2, Defendants informed that they would not stipulate to relation of the cases because they believed the nature of the claims and scope of the actions were sufficiently distinct.

I swear under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of March, 2026, in San Diego, California.

/s/ Kristi Hughes

Kristi Hughes