

Carol A Sobel SBN 84483
Weston Rowland SBN 327599
Law Office of Carol A. Sobel
2632 Wilshire Boulevard, #552
Santa Monica, CA 90403
t. (310) 393-3055
e. carolsobellaw@gmail.com
e. rowland.weston@gmail.com

David Loy SBN 229235
Aaron R. Field SBN 310648
First Amendment Coalition
534 4th St., Suite B
San Rafael, CA 94901
t. (415) 460-5060
e. dloy@firstamendmentcoalition.org
e. afield@firstamendmentcoalition.org

Peter Bibring, SBN 223981
Law Office of Peter Bibring
2140 W. Sunset Blvd. #203
Los Angeles, CA 90026
t. (213) 471-2022
e. peter@bibringlaw.com

Paul Hoffman, SBN 71244
Michael Seplow, SBN 150183
John Washington, SBN 315991
Schonbrun, Seplow, Harris, Hoffman &
Zeldes LLP
200 Pier Avenue #226
Hermosa Beach, California 90254
t.(310) 396-0731
e. hoffpaul@aol.com
e. mseplow@sshhzlaw.com
e. jwashington@sshhlaw.com

Susan E Seager SBN 204824
Law Office of Susan Seager
128 N. Fair Oaks Avenue
Pasadena, CA 91103
t. (310) 890-8991
e. susanseager1999@gmail.com

Attorneys for Plaintiffs

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

LOS ANGELES PRESS CLUB,
STATUS COUP,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a
municipal entity, JIM McDONNELL,
LAPD CHIEF, sued in his official
capacity;

DEFENDANTS.

Case No. 25-cv-05423 HDV-E

**NOTICE OF EX PARTE
APPLICATION FOR CONTEMPT
AND ORDER TO SHOW CAUSE**

Hon. Hernán D. Vera

Date: TBD

Time: TBD

Ctrm: 5B

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that for the reasons fully explained in the accompanying Memorandum of Points and Authorities, Plaintiffs hereby make this ex parte application for contempt and order to show cause why sanctions should not issue. This application is based on the Courts Order [Dkt 44] entered on 7/10/2025, as well as, the Court's inherent power to vindicate judicial authority and ensure the orderly administration of justice through contempt. see e.g. *Spallone v. United States*, 493 U.S. 265, 276 (1990) (citation omitted). Plaintiffs support this application with the accompanying memorandum of law, declarations and exhibits submitted in support thereof.

As further described in the complaint, memorandum and proposed order submitted with this application, Plaintiffs hereby seek that the Court find Defendants in contempt and set a hearing on an Order to Show Cause why Defendants should not be sanctions for contempt of the Court's TRO Order, based on LAPD's actions on August 8, 2025. Plaintiffs respectfully request that the Court order LAPD Chief Jim McDonnell to appear personally at the hearing on the Order to Show Cause to explain the Department's conduct on August 8, 2025. At such a hearing, the Court can determine additional civil contempt remedies as appropriate, including but not limited to setting penalties for further violations of the TRO Order and modifying the TRO Order to expressly encompass use of batons and any other type of force and to require LAPD to have a designated liaison from the Office of Operations at every protest or First Amendment-protected event.

As described in the complaint, memorandum and proposed order submitted with this application Plaintiffs request that this Court appoint a Special Master at the City's expense to conduct an independent investigation into the LAPD's violation of the preliminary injunction during the June 2025 protests. The violations supporting this motion indicate that the LAPD as an institution has failed to incorporate this Court's clear directives to protect peaceful protestors. A prompt report from an independent investigator about the LAPD's recent conduct along with recommendations for further actions to make this Court's Order more effective would enable this Court to fashion

1 further action to an independent set of facts.

2 **Compliance with Local Rule 7-19** Compliance with the requirements of Local Rule 7-
3 19.1 and this Court's procedures is set forth in the Declaration of Weston Rowland re Ex
4 Parte Notice, submitted with this application. Plaintiffs have provided notice of this Ex
5 Parte Application to the Defendant City. Notice was given to Cory M. Brente Sr. Asst.
6 City City Attorney at approximately 5:00 a.m. on this date. Written notice was provided
7 as set forth in the attached letter.

8 **Defendants' Position.** Defendants have not advised if they will oppose. Pursuant to
9 Local Rule 7-19, the name, address, telephone number and e-mail address of counsel for
10 the opposing party is:

11 Cory M. Brente
12 Sr. Asst. City City Attorney
13 City Hall East, 200 N. Main Street, 8th Floor
14 Los Angeles, CA 90012
15 Email: cory.brente@lacity.org
16 Tel: 213-978-6900

17 Dated: 8/13/2025

Respectfully submitted,
LAW OFFICE OF CAROL A. SOBEL
FIRST AMENDMENT COALITION
LAW OFFICE OF PETER BIBRING
SCHONBRUN, SEPLOW, HARRIS,
HOFFMAN & ZELDES LLP
LAW OFFICE OF SUSAN SEAGER

22 By: /s/ Weston Rowland

23 _____
24 Attorney
25 *Attorney for Plaintiffs*