

1 CALIFORNIA JUSTICE CENTER  
Emily Rae (State Bar No. 308010)  
2 emily@calpolicycenter.org  
18002 Irvine Blvd., Suite 108  
3 Tustin, CA 92780  
Telephone: (949) 237-2573

4 ADVOCATES FOR FAITH & FREEDOM  
5 Robert Tyler (State Bar No.179572)  
btyler@faith-freedom.com  
6 25026 Las Brisas Road  
Murrieta, California 92562  
7 Telephone: (951) 304-7583

8 *Attorneys for Defendant Chino Valley Unified District*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF SAN BERNARDINO**

11  
12 THE PEOPLE OF THE STATE OF  
CALIFORNIA, EX REL, ROB BONTA,  
13 ATTORNEY GENERAL OF THE STATE  
OF CALIFORNIA,

14 Plaintiff(s)

15 v.

16 CHINO VALLEY UNIFIED SCHOOL  
17 DISTRICT

18 Defendant(s)

19 And

20 NICHOLE VICARIO, et al.,

21 Defendants-Interveners  
22

Case No.: CIVSB2317301

**DEFENDANT CHINO VALLEY UNIFIED  
SCHOOL DISTRICT'S NOTICE OF  
MOTION TO DISSOLVE THE COURT'S  
OCTOBER 3, 2024, FINAL JUDGMENT  
AND PERMANENT INJUNCTION**

Date: August 19, 2026  
Time: 8:30 am  
Dept.: S-28

1           **PLEASE TAKE NOTICE** that on August 19, 2026, at 8:30 a.m., or as soon thereafter as  
2 the matter may be heard, Defendant Chino Valley Unified School District (“District”) will and  
3 hereby does move this Court for an order dissolving the Permanent Injunction entered on October  
4 3, 2024.

5           This motion is made pursuant to Code of Civil Procedure § 533, California Civil Code §  
6 3424, and the Court’s inherent equitable authority on the grounds that a material change in  
7 controlling law—the United States Supreme Court’s March 2, 2026 decision in *Mirabelli v. Bonta*—  
8 has fundamentally undermined the legal basis for the injunction, and that continued enforcement is  
9 inequitable and unlawful.

10           This motion is based on this Notice, the accompanying Memorandum of Points and  
11 Authorities, the records and files in this action, and such further evidence and arguments as may be  
12 presented at the hearing.

13  
14 DATED: May 5, 2026

CALIFORNIA JUSTICE CENTER

15  
16 By: Emily Rae  
17 Emily Rae  
18 Attorneys for **Defendant Chino Valley Unified**  
**School District**

19  
20 ADVOCATES FOR FAITH & FREEDOM

21 By: Robert Tyler  
22 Robert Tyler, Esq.  
23 Attorneys for **Defendant Chino Valley Unified**  
24 **School District**

1 **PROOF OF SERVICE**

2 I am an employee in the County of Riverside. I am over the age of 18 years and not a party  
3 to the within entitled action; my business address is 25026 Las Brisas Road, Murrieta, California  
4 92562.

5 On May 5, 2026, I served a copy of the following document(s) described as **DEFENDANT**  
6 **CHINO VALLEY UNIFIED SCHOOL DISTRICT’S NOTICE OF MOTION TO DISSOLVE**  
7 **THE COURT’S OCTOBER 3, 2024, FINAL JUDGMENT AND PERMANENT**  
8 **INJUNCTION** on the interested party(ies) in this action as follows:

9 **SEE ATTACHED SERVICE LIST**

10  **BY E-MAIL OR ELECTRONIC TRANSMISSION.** Based on a court order or an  
11 agreement of the parties to accept service by e-mail or electronic transmission, I transmitted  
12 copies of the above-referenced document(s) on the interested parties in this action by  
electronic transmission. Said electronic transmission reported as complete and without  
error.

13  **BY FACSIMILE TRANSMISSION.** Pursuant to agreement and written confirmation of  
14 the parties to accept service by facsimile transmission, I transmitted copies of the above-  
15 referenced document(s) on the interested parties in this action by facsimile transmission from  
16 (951) 600-4996. A transmission report issued as complete and without error.

17  **BY UNITED STATES POSTAL SERVICE.** I am readily familiar with the practice for  
18 collection and processing of correspondence for mailing and deposit on the same day in the  
ordinary course of business with the United States Postal Service. Pursuant to that practice,  
I sealed in an envelope, with postage prepaid and deposited in the ordinary course of business  
with the United States Postal Service in Murrieta, California, the above-referenced  
document(s).

19  **BY OVERNIGHT DELIVERY.** I enclosed the above-referenced document(s) in an  
20 envelope or package provided by an overnight delivery carrier and addressed as above. I  
21 placed the envelope or package for collection and overnight delivery at an office or a  
regularly utilized drop box of the overnight delivery carrier.

22  **BY PERSONAL SERVICE.** I caused copies of the above-referenced documents to the  
addressee(s) noted above served by process server.

23 I declare under penalty of perjury under the laws of the United States of America that the  
24 foregoing is true and correct and that I am an employee in the office of a member of the bar of this  
Court who directed this service.

25 

26 \_\_\_\_\_  
27 Susan Y. Kenney

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SERVICE LIST**

Rob Bonta  
Attorney General of California  
Michael L. Newman  
Senior Assistant Attorney General  
Laura L. Faer  
Supervising Deputy Attorney General  
Delbert Tran  
Deputy Attorney General  
455 Golden Gate Avenue, #11000  
San Francisco, CA 94102-7004  
Email: Delbert.tran@doj.ca.gov