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ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT
5/5/2026 2:38 PM
By: Eric Iturralde, DEPUTY

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Attorneys for Defendant Chino Valley Unified District

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

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

Plaintiff(s)

v.

CHINO VALLEY UNIFIED SCHOOL
DISTRICT

Defendant(s)

And

NICHOLE VICARIO, et al.,

Defendants-Interveners

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**
19 **School District**

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-
referenced document(s) on the interested parties in this action by facsimile transmission from
(951) 600-4996. A transmission report issued as complete and without error.

15 ☒ **BY UNITED STATES POSTAL SERVICE.** I am readily familiar with the practice for
16 collection and processing of correspondence for mailing and deposit on the same day in the
17 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
18 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
placed the envelope or package for collection and overnight delivery at an office or a
regularly utilized drop box of the overnight delivery carrier.

21 ☐ **BY PERSONAL SERVICE.** I caused copies of the above-referenced documents to the
22 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.

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26 _____
27 Susan Y. Kenney
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