

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

TEXAS DEMOCRATIC PARTY, GILBERTO §
HINOJOSA, Chair of the Texas Democratic §
Party, JOSEPH DANIEL CASCINO, SHANDA §
MARIE SANSING, and §
BRENDA LI GARCIA §
Plaintiffs, §

v. §

GREG ABBOTT, Governor of Texas; RUTH §
HUGHS, Texas Secretary of State, DANA §
DEBEAUVOIR, Travis County Clerk, and §
JACQUELYN F. CALLANEN, Bexar County §
Elections Administrator §
Defendants. §

Case No. 5-20:cv-00438-FB

RESPONSE TO RENEWED MOTION OF LEAGUE OF UNITED
LATIN AMERICAN CITIZENS AND TEXAS LEAGUE OF
UNITED LATIN AMERICAN CITIZENS TO INTERVENE AS PLAINTIFFS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 24

TO THE HONORABLE JUDGE BIERY:

Notice is hereby given that Plaintiffs Texas Democratic Party, Gilberto Hinojosa, Joseph Cascino, Shanda Sansing, and Brenda Li Garcia (“Plaintiffs”), do not oppose Plaintiff-Intervenors League of United Latin American Citizens and Texas League of United Latin American Citizens’ (“Plaintiff-Intervenors”) Renewed Motion to Intervene pursuant to Federal Rule of Civil Procedure 24. If permitted by this Court, while Defendants’ appeal of the Court’s limited Order Granting Preliminary Injunction is pending before the Fifth Circuit Court of Appeals, Plaintiffs intend to continue pursuing, if necessary, discovery and litigation on the merits of their race-based claims, including under Section 2 of the Voting Rights Act (“VRA”). Plaintiff-Intervenors’ proposed complaint raises issues of fact and law substantially related to those brought by Plaintiffs, including

with respect to Section 2 of the VRA, and as such, Plaintiff-Intervenors do not oppose Plaintiffs' participation in the litigation in this Court or on appeal.

Respectfully submitted,

TEXAS DEMOCRATIC PARTY

By: /s/ Chad W. Dunn

Chad W. Dunn

General Counsel

State Bar No. 24036507

Brazil & Dunn, LLP

4407 Bee Caves Road, Suite 111

Austin, Texas 78746

Telephone: (512) 717-9822

Facsimile: (512) 515-9355

chad@brazilanddunn.com

K. Scott Brazil

State Bar No. 02934050

Brazil & Dunn, LLP

13231 Champion Forest Drive, Suite 406

Houston, Texas 77069

Telephone: (281) 580-6310

Facsimile: (281) 580-6362

scott@brazilanddunn.com

Dicky Grigg

State Bar No. 08487500

Law Office of Dicky Grigg, P.C.

4407 Bee Caves Road, Suite 111

Austin, Texas 78746

Telephone: 512-474-6061

Facsimile: 512-582-8560

dicky@grigg-law.com

Martin Golando

The Law Office of Martin Golando, PLLC

SBN #: 24059153

N. Saint Mary's, Ste. 700

San Antonio, Texas 78205

(210) 892-8543

martin.golando@gmail.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been sent via the Court's electronic filing system to all counsel of record on May 22 2020.

/s/ Chad W. Dunn
Chad W. Dunn