

and

**ZACHARY PRICE, LEAGUE OF
WOMEN VOTERS OF TEXAS,
LEAGUE OF WOMEN VOTERS
OF AUSTIN-AREA, MOVE TEXAS
ACTION FUND,
WORKERS DEFENSE
ACTION FUND,
Intervenors/Plaintiffs**

v.

TRAVIS COUNTY, TEXAS

**DANA DEBEAUVOIR IN HER
CAPACITY AS TRAVIS COUNTY
CLERK,
Defendant**

and

STATE OF TEXAS,
Intervenor/Defendant

201st JUDICIAL DISTRICT

COMES NOW, Defendant Travis County Clerk, Dana DeBeauvoir ("Clerk DeBeauvoir" or "Defendant") and files her Original Answer, as follows:

A. GENERAL DENIAL

In accordance with Rule 92 of the Texas Rules of Civil Procedure, Clerk DeBeauvoir generally denies each and every allegation set forth in (1) Plaintiffs, Texas Democratic Party, et al.'s Original Petition and Application for Temporary Injunction, Permanent Injunction and Declaratory

Judgment; (2) the State of Texas' Plea in Intervention; and (3) the Plea in Intervention filed by Zachary Price, et al., and demands strict proof thereof.

B. SOVEREIGN IMMUNITY

Clerk DeBeauvoir asserts that Plaintiffs' claims for recovery of attorneys' fees or other monetary relief are affirmatively barred by the doctrine of sovereign immunity insofar as the Texas Tort Claims Act excludes recovery for those acts that are the product of discretionary powers and inasmuch as a suit against a public official in her official capacity is a suit against the governmental entity. Travis County is a political subdivision of the State of Texas and enjoys sovereign immunity, both from suit and from liability, except insofar as the Texas Legislature has provided a limited waiver of its sovereign immunity by way of the Texas Tort Claims Act. Defendant hereby affirmatively pleads and asserts her claim to and defense of sovereign immunity and the exemptions, exceptions and limitations of the Texas Tort Claims Act.

WHEREFORE, PREMISES CONSIDERED, Defendant Travis County Clerk, Dana DeBeauvoir prays that Plaintiffs take nothing by reason of this suit and that Defendant recover her expenses, with all costs of court, and any other and further relief to which she may show herself justly entitled.

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Respectfully submitted,

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ATTORNEYS FOR DEFENDANT
TRAVIS COUNTY CLERK,
DANA DEBEAUVOIR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Defendant Travis County Clerk, Dana DeBeauvoir's Original Answer** was served in accordance with the Texas Rules of Civil Procedure by electronic service and/or electronic mail on all parties and attorneys of record in this proceeding on this 13th day of April, 2020, including:

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