

10/12/2015 11:34:28 AM

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-15-004336  
Terri Juarez

**CAUSE NO. D-1-GN-15-004336**

<b>GRASSROOTS LEADERSHIP, INC.</b>	§	<b>IN THE DISTRICT COURT</b>
<b>Plaintiff,</b>	§	
	§	
<b>V.</b>	§	<b>TRAVIS COUNTY, TEXAS</b>
	§	
<b>TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES,</b>	§	
<b>Defendant.</b>	§	<b>353<sup>rd</sup> JUDICIAL DISTRICT</b>

**RULE 11 AGREEMENT**

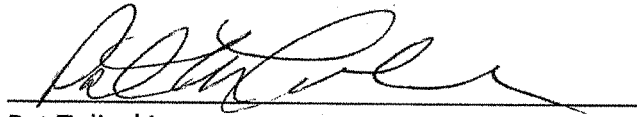
Under Texas Rule of Civil Procedure 11 and without waiver of any applicable due order of pleading rules and jurisdictional challenges, the parties stipulate to, agree to, and are bound by, the following facts. On October 1, 2015, the Defendant, Texas Department of Family & Protective Services ("DFPS"), accepted license applications for two Immigration & Customs Enforcement ("ICE") detention centers: (1) the South Texas Family Residential Center (located near Dilley, Texas, "Dilley Center") and (2) the Karnes Family Residential Center (located in Karnes, Texas, "Karnes Center"). Public hearings have been set for October 22, 2015 (Dilley Center), and October 23, 2015 (Karnes Center), concerning the potential licensure of these facilities. Therefore, according to the applicable law and rules, DFPS cannot and will not issue any potential licenses for either of these facilities before the public hearings have been completed, *i.e.* after October 22, 2015, and October 23, 2015.

*Grassroots Leadership, Inc. v. Texas Dept. of Family & Prot. Servs.*, No. D-1-GN-15-004336, in the 353<sup>rd</sup> Judicial District, Travis County, Texas.

**RULE 11 AGREEMENT**

**STIPULATED AND AGREED TO:**

**BY DEFENDANT DFPS:**



Pat Tulinski

Texas Bar No. 20283485

Assistant Attorney General

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Administrative Law Division

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Austin, Texas 78711-2548

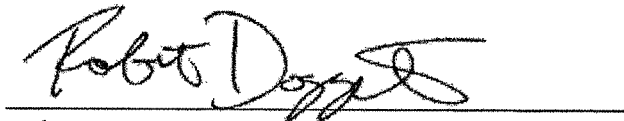
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*ATTORNEYS FOR DEFENDANT*

**BY PLAINTIFF GRASSROOTS LEADERSHIP, INC.**



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