

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

CITY OF EL CENIZO, et al.,	§	Civil Action No.: 5:17-CV-00404-OLG
	§	(Lead Case)
EL PASO COUNTY; RICHARD WILES,	§	
SHERIFF OF EL PASO COUNTY; JO	§	
ANNE BERNAL, COUNTY ATTORNEY	§	
OF EL PASO COUNTY, in their official	§	Civil Action No: 5:17-CV-00459-OLG
capacity, the TEXAS ORGANIZING	§	(Consolidated case)
PROJECT EDUCATION FUND; and	§	
MOVE SAN ANTONIO,	§	
	§	
CITY OF SAN ANTONIO, et al.,	§	Civil Action No: 5:17-CV-00489-OLG
	§	(Consolidated case)
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	
THE STATE OF TEXAS; et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

CONSOLIDATED PLAINTIFFS EL PASO COUNTY, ET AL.’S EMERGENCY
APPLICATION FOR A PRELIMINARY INJUNCTION

Plaintiffs El Paso County, Richard Wiles, Sheriff of El Paso County, in his official capacity, Jo Anne Bernal, County Attorney of El Paso County, in her official capacity, the Texas Organizing Project Education Fund, and MOVE San Antonio (“Plaintiffs”) file this Emergency Application for a Preliminary Injunction pursuant to Fed. R. Civ. P. 65(a) and the Court’s Order of June 16, 2017 Dkt. No. 45, and respectfully request this Court to issue an order preliminary enjoining SB 4 in its entirety. In support of their Application, Plaintiffs contemporaneously file the following documents:

1. Memorandum of Law in Support of Plaintiffs’ Emergency Application for a Preliminary Injunction;

2. Affidavits and other evidence in Support of Plaintiffs' Emergency Application and for a Preliminary Injunction.
3. Proposed Order granting Plaintiffs' Application for a Preliminary Injunction.

Based on the supporting facts, legal authorities and arguments contained in said documents, Plaintiffs respectfully pray that this Court grant their Emergency Application for a Preliminary Injunction.

DATED: June 19, 2017

Respectfully submitted,

By: /s/ Efrén C. Olivares

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RICHARD WILES, SHERIFF OF EL PASO
COUNTY; and JO ANNE BERNAL, COUNTY
ATTORNEY FOR THE COUNTY OF EL PASO.

CERTIFICATE OF CONFERENCE

Plaintiffs conferred with Defendants regarding this Emergency Application for a Preliminary Injunction via e-mail on June 19, 2017. Defendants stated that they oppose the relief sought.

/s/ Efrén C. Olivares
Efrén C. Olivares

CERTIFICATE OF SERVICE

I certify that, on June 19, 2017, I filed the foregoing Emergency Application for a Preliminary Injunction via the Court's ECF/CM system, which will serve a copy on all counsel of record.

/s/ Efrén C. Olivares
Efrén C. Olivares