

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. §

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

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. §

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 Hinjosa, 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

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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