

demonstrably dilutes the voting strength of the minority community in violation of the principles of *White v. Regester*, compare, *Robinson v. Commissioner's Court, Anderson County*, 505 F.2d 674 (5th Cir. 1974), and was done for the purpose of protecting an Anglo incumbent. (Martin Ex. 5, Bell County.)

3. The State's filing threw in, somewhat belatedly, a claim that we lack standing to question the Harris County redistricting scheme. (Advisory at 30.) By a series of orders beginning in July 2011, the Court consolidated all of Plaintiffs' claims "for all purposes." (Clerk's Doc. Nos. 23, 63, 72, and 76.) The effect of these orders was to create a "single judicial unit." See, *Ringwald v Harris*, 675 F.2d 768, 771 (5th Cir. 1982). Obviously, standing when issues of mal-apportionment and discrimination exist has been broadly read. See, *United States v. SCRAP*, 412 U.S. 669, fn. 14 (1973). "We have allowed important interests to be vindicated by plaintiffs with no more at stake in the outcome of an action than a fraction of a vote, see Baker v. Carr, 369 U.S. 186..." Given the orders of consolidation, the standing doctrine, the plethora of Plaintiffs, the late blooming standing claim should not give the Court pause.

Respectfully submitted,



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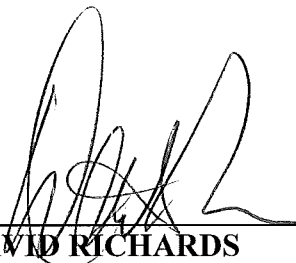
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