

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

SHANNON PEREZ, et al.

*Plaintiffs*

v.

STATE OF TEXAS, et al.

*Defendants*

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CIVIL ACTION NO.  
5:11-CV-0360-OLG-JES-XR  
[Lead Case]

**PEREZ PLAINTIFFS' PROPOSED CONCLUSIONS OF LAW**

The Perez Plaintiffs hereby submit their Proposed Conclusions of Law as follows:

1. The State House plan enacted in 2011, HB 283, had the purpose and effect of minimizing and diluting minority voting strength in violation of Section 2 of the Voting Rights Act and the Fourteenth Amendment.
2. HB 283 had the purpose and effect of minimizing and diluting minority voting strength in violation of Section 2 of the Voting Rights Act and the Fourteenth Amendment in the enactment of the following House Districts:
  - a. Dallas County Districts 101, 102, 103, 104, 105
  - b. Harris County Districts 132, 137, 145, 148, 149
  - c. Tarrant County District 93
  - d. Bexar County District 117
  - e. Hidalgo County District 41
  - f. McLennan County District 57 in the Benchmark Plan
  - g. Bell County District 54
  - h. Fort Bend County District 26

3. HB 283 has unconstitutionally excessive population deviation among the House districts in Dallas, Harris and Tarrant Counties. These deviations are the result of gerrymandering along racial ethnic and partisan lines, in violation of the principles established in *Cox v. Larios*, 542 US 947 (2004). Accordingly, the redistricting plans for these counties are void.

Respectfully submitted,  
/s/ David Richards

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of October 2014, I served all counsel of record/parties as indicated below:

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