

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SHANNON PEREZ, *et al.*,)

Plaintiffs,)

v.)

STATE OF TEXAS, *et al.*,)

Defendants.)

_____)

JOHN T. MORRIS,)

Plaintiff,)

v.)

STATE OF TEXAS, *et al.*,)

Defendants.)

_____)

TEXAS LATINO REDISTRICTING)
TASK FORCE, *et al.*,)

Plaintiffs,)

v.)

RICK PERRY ,)

Defendant.)

_____)

CIVIL ACTION NO.
SA-11-CA-360-OLG-JES-XR
[Lead case]

CIVIL ACTION NO.
SA-11-CA-615-OLG-JES-XR
[Consolidated case]

CIVIL ACTION NO.
SA-11-CA-490-OLG-JES-XR
[Consolidated case]

MARAGARITA V. QUESADA, *et al.*,)

Plaintiffs,)

v.)

RICK PERRY, *et al.*,)

Defendants)

CIVIL ACTION NO.
SA-11-CA-592-OLG-JES-XR
[Consolidated case]

MEXICAN AMERICAN LEGISLATIVE)
CAUCUS, TEXAS HOUSE OF)
REPRESENTATIVES (MALC),)

Plaintiffs,)

v.)

STATE OF TEXAS, *et al.*,)

Defendants.)

CIVIL ACTION NO.
SA-11-CA-361-OLG-JES-XR
[Consolidated case]

EDDIE RODRIGUEZ, *et al.*,)

Plaintiffs,)

v.)

RICK PERRY, *et al.*,)

Defendants.)

CIVIL ACTION NO.
SA-11-CA-635-OLG-JES-XR
[Consolidated case]

**PLAINTIFF JOHN T. MORRIS RESPONSE TO COURT’S
REQUEST FOR ADVISORY AS TO QUESTIONS ENUMERATED
IN ORDER ISSUED SEPTEMBER 7, 2012**

1 As a pro se party, and a party with a dissimilar claim in respect to almost all of the other
claims in this consolidated action, it is obvious that any attempt to answer most of the questions
3 this Court is soliciting would certainly be naive on this claimant's part. But there are two
questions that do pertain to this parties claim where an observation may be beneficial or not.
5 And since this claimant has a motion pending and there has not been a final certified order issued
it is assumed that an observation would not be inappropriate.

7 Question eight asks "[i]f the Texas legislature does take up redistricting, how that will
affect the Court's future course of action herein." And the second question as to "[t]he timing of
9 ruling on the remaining motions."

 As to the legislature taking up redistricting in the next session there is the following
11 observation in respect to this plaintiff's claim.

 The basis of the claim as the Court is aware is that the voter must be allowed the
13 opportunity to vote for his representative in subsequent elections and that any redistricting that
separates the voter from his representative prior to an election is adverse to a "frequent elections"
15 principle that was clearly the intent of the framers of the Constitution and a requirement of the
citizens during the ratification process. And also that this principle of "frequent elections" goes
17 hand in hand with the intent of the First Amendment's free speech and free press principles. To
remove a political candidate from the reach of any number of his constituents unless absolutely
19 necessary forces the constituent or constituents to discard their knowledge of, and experiences
with, his or her former representative and is tantamount to a denial of the voter's First
21 Amendment rights which are most commonly understood to promote knowledgeable elections

and good government. And in a larger sense to redistrict or gerrymander, especially for partisan
23 purposes, is to disturb the numerous political experiences and conversations which have taken
place in a district and which have the purpose of sorting out the majority opinion during the
25 voting process. Redistricting under the above principles and conditions can only be
accomplished by radiating population densities into underpopulated districts from other
27 overpopulated districts or vice versa based on commonly utilized principles with the intent of
separating as few people from their immediate representatives as possible.

29 In this humble claimant's opinion the above argument is both reasonable and credible and
on appeal could very well be seen to be so. In this case the sooner the state is aware that there is
31 litigation still ongoing the less chance the legislators will feel compelled to go forward with
costly and contentious legislation before the courts will have come to a final judgement as to the
33 merits of the remaining claims.

Submitted with respect this day December 3rd, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2012 a true and correct copy of this filing was delivered to all counsel in this matter listed below via the United States District Court, Western Division of Texas, San Antonio Division, CM/ECF system or when this was not possible by electronic mail or Certified United States postal mail.

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