

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

SHANNON PEREZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants.

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

STIPULATION OF FACTS NO. 1

It is hereby stipulated, by and between the respective parties whose signatures appear below, that the following facts may be admitted into evidence in lieu of further proof or testimony:

1. The following persons (with their correct political party affiliations) were the elected members of the Texas House of Representatives when Congressional Redistricting Plan C235 was enacted in June 2013:

District	Representative	Party
1	George Lavender	R
2	Dan Flynn	R
3	Cecil Bell, Jr.	R
4	Lance Gooden	R
5	Bryan Hughes	R
6	Matt Schaefer	R
7	David Simpson	R
8	Byron Cook	R
9	Chris Paddie	R
10	James R. "Jim" Pitts	R
11	Travis Clardy	R
12	Kyle J. Kacal	R
13	Lois W. Kolkhorst	R
14	John Raney	R
15	Steve Toth	R
16	C. Brandon Creighton	R
17	Timothy A. Kleinschmidt	R

District	Representative	Party
18	John Otto	R
19	James White	R
20	Marsha Farney	R
21	Allan B. Ritter	R
22	Joseph Dwain "Joe" Deshotel	D
23	Allen Craig "Craig" Eiland	D
24	Greg Bonnen	R
25	Dennis H. Bonnen	R
26	Rick Miller	R
27	Ron Reynolds	D
28	John Zerwas	R
29	Ed Thompson	R
30	Geanie W. Morrison	R
31	Ryan Guillen	D
32	Todd Ames Hunter	R
33	E. Scott Turner	R
34	Abel Herrero	D
35	Oscar Longoria	D
36	Sergio Muñoz, Jr.	D
37	René Orlando Oliveira	D
38	Eduardo "Eddie" Lucio III	D
39	Armando "Mando" Martinez	D
40	Terry Canales	D
41	Robert D. "Bobby" Guerra	D
42	Richard Edward Raymond	D
43	Juan Manuel Lozano	R
44	John Kuempel	R
45	Jason A. Isaac	R
46	Dawna Mathilda Dukes	D
47	Paul Daniel Workman	R
48	Donna Howard	D
49	Elliott Naishtat	D
50	Mark Strama	D
51	Eduardo "Eddie" Rodriguez	D
52	Larry D. Gonzales	R
53	Harvey Hilderbran	R
54	Jimmie Don Aycock	R
55	Ralph Sheffield	R
56	Charles "Doc" Anderson	R
57	Trent Ashby	R
58	Rob Orr	R

District	Representative	Party
59	Jesse David Sheffield	R
60	James L. "Jim" Keffer	R
61	Phil S. King	R
62	Larry Phillips	R
63	Tan Parker	R
64	Myra Ellen Crownover	R
65	Ronald E. Simmons	R
66	Nicholas Van Taylor	R
67	Jeff Leach	R
68	Drew Springer, Jr.	R
69	James B. Frank	R
70	William Scott Sanford	R
71	Susan Lewis King	R
72	Drew Darby	R
73	Doug Miller	R
74	Alfonso "Poncho" Nevárez	D
75	Mary E. González	D
76	Naomi R. Gonzalez	D
77	Marisa Marquez	D
78	Joseph E. "Joe" Moody	D
79	Joseph C. "Joe" Pickett	D
80	Tracy O. King	D
81	Tryon D. Lewis	R
82	Thomas Russell "Tom" Craddick	R
83	Charles Perry	R
84	John Frullo	R
85	Phil Stephenson	R
86	John T. Smithee	R
87	Walter "Four" Price IV	R
88	Ken King	R
89	Jodie Anne Laubenberg	R
90	Lon Burnam	D
91	Stephanie Klick	R
92	Jonathan Stickland	R
93	Matt Krause	R
94	Diane Patrick	R
95	Nicole Collier	D
96	William "Bill" Zedler	R
97	Craig Goldman	R
98	Giovanni Capriglione	R
99	Charlie Geren	R

District	Representative	Party
100	Eric Johnson	D
101	Chris Turner	D
102	Stefani Carter	R
103	Rafael Anchia	D
104	Roberto R. Alonzo	D
105	Linda Harper-Brown	R
106	Pat Fallon	R
107	Kenneth Sheets	R
108	Daniel Hugh Branch	R
109	Helen Giddings	D
110	Toni Rose	D
111	Yvonne Davis	D
112	Angie Chen Button	R
113	Cindy Burkett	R
114	Jason Villalba	R
115	Bennett Ratliff	R
116	Ferdinand Frank "Trey" Martinez Fischer	D
117	Philip Cortez	D
118	Joe Farias	D
119	Roland Gutierrez	D
120	Ruth McClendon	D
121	Joe Straus III	R
122	Lyle Larson	R
123	Michael U. "Mike" Villarreal	D
124	José Menéndez	D
125	Justin Rodriguez	D
126	Patricia Harless	R
127	Dan Huberty	R
128	Wayne Smith	R
129	John Edward Davis	R
130	Billy Allen Fletcher	R
131	Alma A. Allen	D
132	William A. "Bill" Callegari	R
133	Jim Murphy	R
134	Sarah Davis	R
135	Gary Wayne Elkins	R
136	Anthony "Tony" Dale	R
137	Eugene Wu	D
138	Dwayne Bohac	R
139	Sylvester Turner	D

District	Representative	Party
140	Armando Lucio Walle	D
141	Senfronia Thompson	D
142	Harold V. Dutton, Jr.	D
143	Ana E. Hernandez	D
144	Mary Ann Perez	D
145	Carol Alvarado	D
146	Borris L. Miles	D
147	Garnet F. Coleman	D
148	Jessica Cristina Farrar	D
149	Hubert Vo	D
150	Debbie Riddle	R

2. The following persons were the elected members of the Texas House of Representatives when Congressional Redistricting Plan C185 was enacted in 2011:

District	Representative	Party
1	George Lavender	R
2	Dan Flynn	R
3	Erwin Cain	R
4	Lance Gooden	R
5	Bryan Hughes	R
6	Leo Berman	R
7	David Simpson	R
8	Byron Cook	R
9	Wayne Christian	R
10	James R. "Jim" Pitts	R
11	Charles L. "Chuck" Hopson II	R
12	James White	R
13	Lois W. Kolkhorst	R
14	Fred Brown	R
15	Rob Eissler	R
16	C. Brandon Creighton	R
17	Timothy A. Kleinschmidt	R
18	John Otto	R
19	Mike "Tuffy" Hamilton	R
20	Charles Schwertner	R
21	Allan B. Ritter	R
22	Joseph Dwain "Joe" Deshotel	D
23	Allen Craig "Craig" Eiland	D

District	Representative	Party
24	Larry Taylor	R
25	Dennis H. Bonnen	R
26	Charles Franklin Howard	R
27	Ron Reynolds	D
28	John Zerwas	R
29	Randy Weber	R
30	Geanie W. Morrison	R
31	Ryan Guillen	D
32	Todd Ames Hunter	R
33	Raul Torres	R
34	Connie Scott	R
35	Jose Aliseda	R
36	Sergio Muñoz, Jr.	D
37	René Orlando Oliveira	D
38	Eduardo “Eddie” Lucio III	D
39	Armando “Mando” Martinez	D
40	Aaron Pena	R
41	Veronica Gonzales	D
42	Richard Edward Raymond	D
43	Juan Manuel Lozano	D
44	John Kuempel	R
45	Jason A. Isaac	R
46	Dawanna Mathilda Dukes	D
47	Paul Daniel Workman	R
48	Donna Howard	D
49	Elliott Naishtat	D
50	Mark Strama	D
51	Eduardo “Eddie” Rodriguez	D
52	Larry D. Gonzales	R
53	Harvey Hilderbran	R
54	Jimmie Don Aycock	R
55	Ralph Sheffield	R
56	Charles “Doc” Anderson	R
57	Marva Beck	R
58	Rob Orr	R
59	Sid C. Miller	R
60	James L. “Jim” Keffer	R

District	Representative	Party
61	Phil S. King	R
62	Larry Phillips	R
63	Tan Parker	R
64	Myra Ellen Crownover	R
65	Burt R. Solomons	R
66	Nicholas Van Taylor	R
67	Jerry A. Madden	R
68	Richard L. "Rick" Hardcastle	R
69	Lanham Lyne	R
70	W. Kenneth "Ken" Paxton, Jr.	R
71	Susan Lewis King	R
72	Drew Darby	R
73	Doug Miller	R
74	Pete Peña Gallego	D
75	Inocente "Chente" Quintanilla	D
76	Naomi R. Gonzalez	D
77	Marisa Márquez	D
78	Dee Margo	R
79	Joseph C. "Joe" Pickett	D
80	Tracy O. King	D
81	Tryon D. Lewis	R
82	Thomas Russell "Tom" Craddick	R
83	Charles Perry	R
84	John Frullo	R
85	Jim Landtroop	R
86	John T. Smithee	R
87	Walter "Four" Price IV	R
88	Warren D. Chisum	R
89	Jodie Anne Laubenberg	R
90	Lon Burnam	D
91	Kelly Hancock	R
92	Todd Smith	R
93	Barbara Nash	R
94	Diane Patrick	R
95	Marc Veasey	D
96	William "Bill" Zedler	R
97	Mark M. Shelton	R

District	Representative	Party
98	Vicki Truitt	R
99	Charlie Geren	R
100	Eric Johnson	D
101	Cindy Burkett	R
102	Stefani Carter	R
103	Rafael Anchia	D
104	Roberto R. Alonzo	D
105	Linda Harper-Brown	R
106	Rodney Anderson	R
107	Kenneth Sheets	R
108	Daniel Hugh Branch	R
109	Helen Giddings	D
110	Barbara Mallory Caraway	D
111	Yvonne Davis	D
112	Angie Chen Button	R
113	Joe Luther Driver	R
114	Will Ford Hartnett	R
115	Jimmy H. "Jim" Jackson	R
116	Ferdinand Frank "Trey" Martinez Fischer	D
117	John V. Garza	R
118	Joe Farias	D
119	Roland Gutierrez	D
120	Ruth McClendon	D
121	Joe Straus III	R
122	Lyle Larson	R
123	Michael U. "Mike" Villarreal	D
124	José Menéndez	D
125	Joaquin Castro	D
126	Patricia Harless	R
127	Dan Huberty	R
128	Wayne Smith	R
129	John Edward Davis	R
130	Billy Allen Fletcher	R
131	Alma A. Allen	D
132	William A. "Bill" Callegari	R
133	Jim Murphy	R

District	Representative	Party
134	Sarah Davis	R
135	Gary Wayne Elkins	R
136	Beverly Woolley	R
137	Scott Hochberg	D
138	Dwayne Bohac	R
139	Sylvester Turner	D
140	Armando Lucio Walle	D
141	Senfronia Thompson	D
142	Harold V. Dutton, Jr.	D
143	Ana E. Hernandez	D
144	Ken J. Legler	R
145	Carol Alvarado	D
146	Borris L. Miles	D
147	Garnet F. Coleman	D
148	Jessica Cristina Farrar	D
149	Hubert Vo	D
150	Debbie Riddle	R

3. The following persons (with their correct political party affiliations) were the elected members of the Texas State Senate when Congressional Redistricting Plan C235 was enacted in June 2013:

District	Senator	Party
1	Kevin P. Eltife	R
2	Robert F. "Bob" Deuell	R
3	Robert Lee Nichols	R
4	Thomas D. "Tommy" Williams	R
5	Charles Schwertner	R
6	Sylvia R. Garcia	D
7	Dan Patrick	R
8	W. Kenneth "Ken" Paxton, Jr.	R
9	Kelly Hancock	R
10	Wendy R. Davis	D
11	Larry Taylor	R
12	Jane Nelson	R
13	Rodney Glenn Ellis	D
14	Kirk Watson	D
15	John H. Whitmire	D
16	John J. Carona	R

District	Senator	Party
17	Joan Huffman	R
18	Glenn Hegar, Jr.	R
19	Carlos Ismael Uresti	D
20	Juan Jesus "Chuy" Hinojosa	D
21	Judith Lee Zaffirini	D
22	Brian Douglas Birdwell	R
23	Royce West	D
24	Troy L. Fraser	R
25	Donna Campbell	R
26	Leticia Rosa Van de Putte	D
27	Eduardo "Eddie" Lucio, Jr.	D
28	Robert L. Duncan	R
29	José R. Rodríguez	D
30	Craig Estes	R
31	Kelton Gray "Kel" Seliger	R

4. The following persons were the elected members of the Texas State Senate when Congressional Redistricting Plan C185 was enacted in June 2011:

District	Representative	Party
1	Kevin P. Eltife	R
2	Robert F. "Bob" Deuell	R
3	Robert Lee Nichols	R
4	Thomas D. "Tommy" Williams	R
5	Stephen E. "Steve" Ogden	R
6	Mario V. Gallegos, Jr.	D
7	Dan Patrick	R
8	Florence Muriel Shapiro	R
9	Chris Harris	R
10	Wendy R. Davis	D
11	James Michael "Mike" Jackson	R
12	Jane Nelson	R
13	Rodney Glenn Ellis	D
14	Kirk Watson	D
15	John H. Whitmire	D
16	John J. Carona	R
17	Joan Huffman	R
18	Glenn Hegar, Jr.	R

District	Representative	Party
19	Carlos Ismael Uresti	D
20	Juan Jesus “Chuy” Hinojosa	D
21	Judith Lee Zaffirini	D
22	Brian Douglas Birdwell	R
23	Royce West	D
24	Troy L. Fraser	R
25	Earl Jeffrey “Jeff” Wentworth	R
26	Leticia Rosa Van de Putte	D
27	Eduardo “Eddie” Lucio, Jr.	D
28	Robert L. Duncan	R
29	José R. Rodríguez	D
30	Craig Estes	R
31	Kelton Gray “Kel” Seliger	R

5. At the time the Texas Legislature enacted Congressional Redistricting Plan C235 in June 2013, Rick Perry was Texas’ Governor, Greg Abbott was Texas’ Attorney General, David Dewhurst was Lieutenant Governor of Texas, Joe Straus was Speaker of the Texas House of Representatives, Kel Seliger was Chairman of the Senate Redistricting Committee, and Drew Darby was Chair of the House Redistricting Committee.
6. At the time the Texas Legislature enacted Congressional Redistricting Plan C185 in 2011, Rick Perry was Texas’ Governor, Greg Abbott was Texas’ Attorney General, David Dewhurst was Lieutenant Governor of Texas, Joe Straus was Speaker of the Texas House of Representatives, Kel Seliger was Chairman of the Senate Redistricting Committee, and Burt Solomons was Chair of the House Redistricting Committee.
7. The assignment of Census blocks was unchanged from Plan C185 to Plan C235 for the following congressional districts: CDs 1, 3, 4, 5, 13, 15, 17, 21, 31, and 35.
8. The assignment of Census blocks was unchanged, with the exception of certain Census blocks containing zero population, from Plan C185 to Plan C235 for the following congressional districts: CDs 8, 10, 11, 16, 19, 24, 27, and 34.
9. The only change to CD 25 from Plan C185 to Plan C235 was the shifting of three Census blocks, containing a total of 10 persons, from CD 25 to CD 6.
10. The boundaries of all of the Congressional districts in the plan approved by the three-judge court in the consolidated *Perez v. Perry* case on March 19, 2012, are geographically identical in Plan C235 as adopted by the Texas Legislature in June 2013 and signed by then Governor Perry on June 26, 2013.

11. The boundaries of at least the following Texas House Districts are geographically identical in Plan H358 and Plan H283: HD 32, HD 33, HD 34, HD 54, HD 55, HD 81, HD 82, HD 93, HD 95, HD 96, HD 102, HD 104, HD 105, HD 106, HD 107, HD 108, HD 126, HD 130, HD 132 HD 134, HD 135, and HDs 138-142.
12. The Texas Legislative Council's Red-340 report comparing Plan H358 with Plan H283 identifies that 95.9% of the population in HD 103 in Plan H358 was also included within HD 103 in Plan H283.
13. On February 28, 2012, the three-judge panel in *Perez, et al. v. Perry, et al.* (No. SA-11-CV-360) ordered that Plan H309 be entered as an interim Texas House plan. Plan H358 codified the interim Texas House redistricting plan (Plan H309), except for changes made in 14 districts in Dallas, Harris, Tarrant, and Webb Counties.
14. Plaintiff Nina Jo Baker currently resides in Plan C235's CD 33.

Dated: June 28, 2017

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2017, I served a copy of the foregoing on counsel who are registered to receive NEFs through the CM/ECF system. All attorneys who have not yet registered to receive NEFs have been served via first-class mail, postage prepaid.

/s/ J. Gerald Hebert
J. GERALD HEBERT