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]
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]
TEXAS LATINO REDISTRICTING TASK FORCE, et al., *Plaintiffs*, v. RICK PERRY , *Defendant.*	CIVIL ACTION NO. SA-11-CV-490-OLG-JES-XR [Consolidated case]
MARAGARITA V. QUESADA, et al., *Plaintiffs*, v. RICK PERRY, *et al.,*	CIVIL ACTION NO. SA-11-CA-592-OLG-JES-XR [Consolidated case]

Defendants.	)	
_____	)	
	)	
JOHN T. MORRIS,	)	CIVL ACTION NO.
	)	SA-11-CA-615-OLG-JES-XR
Plaintiff,	)	[Consolidated case]
	)	
v.	)	
	)	
STATE OF TEXAS, et al.,	)	
	)	
Defendants.	)	
_____	)	
	)	
EDDIE RODRIGUEZ, et al.	)	CIVIL ACTION NO.
	)	SA-11-CA-635-OLG-JES-XR
Plaintiffs,	)	[Consolidated case]
	)	
v.	)	
	)	
RICK PERRY, et al.,	)	
	)	
Defendants.	)	

PLAINTIFFS' JOINT OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

The Texas State Conference of NAACP Branches, Juanita Wallace, Rev. Bill Lawson, and Howard Jefferson; Congresspersons Eddie Bernice Johnson, Sheila Jackson-Lee, and Alexander Green; the Rodriguez Plaintiffs; the Perez Plaintiffs; the LULAC Plaintiff; and the Quesada Plaintiffs (hereinafter, "Joint Plaintiffs") respectfully urge that this Court deny the motion to dismiss filed by Defendants on May 14, 2014 (Dkt. No. 995). Defendants moved to dismiss all claims relating to the 2011 plan, arguing that such claims are moot. State Motion at 3-

32[1] This Court has rejected that argument twice before, and should continue to do so, for the reasons described below.

I. Standard for Dismissal Under Rule 12(b)(1) and 12(c)

Federal Rule of Civil Procedure 12(b)(1) governs challenges to a court's subject matter jurisdiction. While it is true that the burden of proof on a Rule 12(b)(1) motion to dismiss is on the party asserting jurisdiction, *Strain v. Harrelson Rubber Co.*, 742 F.2d 888, 889 (5th Cir. 1984), in ruling on a Rule 12(b)(1) motion, "the court is permitted to look at evidence in the record beyond simply those facts alleged in the complaint and its proper attachments." *Ambraco, Inc. v. Bossclip B.V.*, 570 F.3d 233, 238 (5th Cir. 2009), *cert. denied*, 130 S.Ct. 1054 (2009); *Ramming v. U.S.*, 281 F.3d 158, 161 (5th Cir. 2001), *cert. denied*, 536 U.S. 960 (2001) (stating that a court ruling on a 12(b)(1) motion may evaluate "(1) the complaint alone, (2) the complaint supplemented by undisputed facts evidenced in the record, or (3) the complaint supplemented by undisputed facts plus the court's resolution of disputed facts").

The standard for deciding a motion for judgment on the pleadings under Federal Rule of Civil Procedure 12(c) is identical to the standard for deciding a 12(b)(6) motion to dismiss. *Guidry v. Am. Pub. Life Ins. Co.*, 512 F.3d 177, 180 (5th Cir. 2007). "Viewing the facts as pled in the light most favorable to the nonmovant, a motion to dismiss or for a judgment on the pleadings should not be granted if a complaint provides enough facts to state a claim to relief that is plausible on its face." *Jebaco, Inc. v. Harrah's Operating Co.*, 587 F.3d 314, 318 (5th Cir. 2009) (citation and internal quotation marks omitted).

[1] The State also moved to dismiss political gerrymandering claims against the 2013 plans. State Motion at 32-35. That part of the motion does not implicate Joint Plaintiffs, and will not be addressed in this opposition.

II. This Court Has Already Decided this Issue

Following the late June 2013 adoption of the interim plans as state law, Texas, on June 28, 2013, first moved to dismiss all claims in this litigation arising from the 2011 plans. After hearing arguments from the parties at a July 1, 2013, status conference, this Court denied that motion without prejudice. Order, Dkt. No. 771 (July 1, 2013).

Texas renewed that motion on July 19, 2013, in its opposition to Plaintiffs' motions to amend their complaints to request 3(c) relief and to further challenge the 2013 plans. After careful consideration, this Court denied that renewed motion to dismiss, this time without qualification. Order, Dkt. No. 886 at 1, 15 (Sept. 6, 2013). No changes in circumstances or law warrant a re-examination of that denial.

III. Claims Arising from the 2011 Plans are Not Moot

As this Court has already correctly concluded, challenges to the 2011 Congressional and State House plans are not moot for at least two distinct reasons: (1) this Court can still grant relief to Plaintiffs on their 2011 claims; and (2) the voluntary cessation exception to the mootness rule is fully applicable in the instant case.

First, the Supreme Court's decision in *Shelby County, Alabama v. Holder*, 570 U.S. _____, 133 S.Ct. 2612, 2013 U.S. Lexis 4917 (June 25, 2013), fundamentally changed the type of relief that Plaintiffs sought in challenging the 2011 redistricting plans. Prior to that decision, the state of Texas was covered by Section 5 of the Voting Rights Act because it met the requirements of Section 4(b) of the Act. In *Shelby*, the Court invalidated Section 4(b), leaving Section 5 standing. *Id*. at *45. Following that invalidation, Plaintiffs in this litigation needed to seek relief under Section 3(c) of the Voting Rights Act, which allows litigants asserting constitutional challenges or Section 2 claims against a non-covered jurisdiction to submit to pre-

enactment review of any voting changes for a set period of time. Plaintiffs had no need to seek such relief when Texas was covered under Section 5, but their claims certainly warrant 3(c) relief, if proven true. Indeed, this Court granted Plaintiffs' motion to amend their complaints to request 3(c) relief on September 6, 2013. Order, Dkt. No. 886, at 1 (Sept. 6, 2013).

The relief that Plaintiffs could obtain under Section 3(c) alone is sufficient to avoid mootness in the instant action. "[E]ven the availability of a partial remedy is sufficient to prevent a case from being moot." *Chafin v. Chafin*, 133 S. Ct. 1017, 1026 (2013) (internal quotation marks omitted); *see also Willy v. Administrative Review Bd.*, 423 F.3d 483, 494 n. 50 (5th Cir. 2005). Now that Plaintiffs have been allowed to amend their complaints, they may be entitled to bail-in relief, and with that potential relief pending, the challenges to the 2011 plans cannot be dismissed as moot.

Furthermore, events subsequent to the issuance of the interim plans have bolstered the reasonableness of Plaintiffs' requested relief. When this Court ordered implementation of Plan C235 and Plan H309 as the interim plans for the 2012 elections, it did so fully acknowledging that "preliminary determinations regarding the merits of the § 2 and constitutional claims" under pinning the plans' designs were "only preliminary conclusions that may be revised upon full analysis." Order on C235, Dkt. No. 692, at 1-2 (March 19, 2012). Afterwards, in the Section 5 case in the D.C. District Court, that Court made full findings, using the *Arlington Heights* analysis applied to intentional discrimination claims under the 14th Amendment, that the 2011 enacted plans had been motivated by an intent on the part of the legislature to discriminate against voters of color. *Texas v. United States*, 887 F. Supp. 2d 133, 160-66, 177-78 (D.D.C. 2012). Those intentional discrimination findings highlight why relief under Section 3(c) is so critical in the instant case.

Secondly, when Defendants have voluntarily ceased the conduct complained of in litigation, the case should be declared moot only where it is "absolutely clear that the allegedly wrongful behavior could not be reasonably expected to recur." *Friends of the Earth, Inc. v. Laidlaw Envtl. Servs.*, 528 U.S. 167, 189 (2000). The party asserting mootness bears the heavy burden of demonstrating that recurrence of the challenged conduct could not be reasonably expected. *Id*. The fact that Defendant is a government entity instead of a private party does not change the analysis. *Northeast Fla. Chapter of the Assoc. Gen. Contractors of Am. v. City of Jacksonville*, 508 U.S. 656, 662 (1993).

Despite this Court's diligent efforts to construct a fair plan for the 2012 (and 2014) elections, constrained, of course, by both time and the directives from the Supreme Court in *Perry v. Perez*, 132 S. Ct. 934 (2012) (per curiam), some of the constitutional flaws identified in the 2011 redistricting plans persist and are embedded in the plans enacted by the Texas legislature last June. This Court acknowledged as much in its second denial of Texas' Rule 12 motion. Order, Dkt. No. 886, at 13 (Sept. 6, 2013).

This Court was correct in its reliance on the *General Contractors* decision. In that case, plaintiffs challenged a Jacksonville city ordinance requiring that 10% of city contracts be set aside for minority businesses. 508 U.S. at 658. After the plaintiffs obtained preliminary relief and while an appeal was pending, the city repealed the challenged ordinance and replaced it with another one, which, while differing from the challenged ordinance in several important respects, still favored minority businesses in the awarding of city contracts. *Id*. at 660-661. The Supreme Court rejected arguments that the plaintiffs' challenge was moot because of the enactment of the new ordinance. *Id*. at 661-662. The Court stated" [t]he new ordinance may disadvantage them to a lesser degree than the old one," but still "it disadvantages them in the same way." *Id*. at 662.

The same principle applies in the instant case, where newly enacted plans, based heavily on the 2011 challenged plans, continue to disadvantage black and Latino voters in the state. This Court already has reached—correctly—this very conclusion. *See* Order, Dkt. No. 886, at 13 ("the new plans may disadvantage Plaintiffs to a lesser degree, but they disadvantage them in the same fundamental way").

Other voting and civil rights cases support the conclusion that the voluntary, but incomplete, cessation of some challenged conduct by Texas does not moot the challenges to the 2011 plans. Before the *Shelby* decision, the need for litigants to seek relief under Section 3(c) of the Voting Rights Act was limited, but precedent directly supports the argument that 3(c) claims are sufficient for a court to retain subject matter jurisdiction even where a redistricting plan has been altered. *Blackmoon v. Charles Mix County*, 505 F. Supp. 2d 585, 592-93. In *Blackmoon*, the defendants proposed a remedial redistricting plan to address the plaintiff's one-person, one-vote claims against the county's plan for electing county commissioners. *Id*. at 587. After agreement on that remedial plain, the plaintiffs filed a motion for further relief, seeking bail-in under Section 3(c). *Id*. The court in *Blackmoon* rejected the defendants' claim that the case was moot because the claims were "based upon the Charles Mix County districts that are no longer in place." *Id*. at 592. Instead, the court found that the plaintiffs might still be entitled to some remedies under Section 3(c). *Id*. at 593. *Blackmoon* is directly on point with this one, and this Court correctly relied upon it in rejecting the state's mootness argument. Order, Dkt. No. 886, at 15 (Sept. 6, 2013).

Finally, school desegregation cases in the Fifth Circuit provide another example of courts retaining jurisdiction over complicated civil rights cases even when the underlying practice or law has been amended. For example, in *Tasby v. Estes*, 342 F. Supp. 945 (N.D. Tex. 1971), the

challenges in federal court to segregated schools in Dallas County persisted for over thirty years, even after new school plans had been implemented. *Tasby v. Estes*, 498 F. Supp. 1130 (N.D. Tex. 1980). Texas' voluntary adoption of the 2013 Congressional and State House redistricting plans does not remedy all of the illegal elements in 2011 redistricting plans. Significant portions of the 2011 maps—including areas and districts under legal challenge by Plaintiffs—were transported without any alteration whatever into the 2013 maps. The 2013 enactments do not protect Plaintiffs and other voters in Texas from being subjected to the same treatment over and over again. As such, the challenges to the 2011 plans are not moot.

IV. Conclusion

For all of the foregoing reasons, Joint Plaintiffs respectfully request that this Court deny Defendants' motion to dismiss all claims arising from the 2011 redistricting plans.

Dated: June 9, 2014

Respectfully submitted,

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