

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

SHANNON PEREZ, <i>et al.</i> ,)	
)	
<i>Plaintiffs</i> ,)	CIVIL ACTION NO.
)	SA-11-CA-360-OLG-JES-XR
v.)	[Lead case]
)	
STATE OF TEXAS, <i>et al.</i> ,)	
)	
<i>Defendants</i> .)	
_____)	
)	
MEXICAN AMERICAN LEGISLATIVE)	CIVIL ACTION NO.
CAUCUS, TEXAS HOUSE OF)	SA-11-CA-361-OLG-JES-XR
REPRESENTATIVES (MALC),)	[Consolidated case]
)	
<i>Plaintiffs</i> ,)	
v.)	
)	
STATE OF TEXAS, <i>et al.</i> ,)	
)	
<i>Defendants</i> .)	
_____)	
)	
TEXAS LATINO REDISTRICTING TASK)	CIVIL ACTION NO.
FORCE, <i>et al.</i> ,)	SA-11-CV-490-OLG-JES-XR
)	[Consolidated case]
<i>Plaintiffs</i> ,)	
v.)	
)	
RICK PERRY ,)	
)	
<i>Defendant</i> .)	
_____)	
)	
MARAGARITA V. QUESADA, <i>et al.</i> ,)	CIVIL ACTION NO.
)	SA-11-CA-592-OLG-JES-XR
<i>Plaintiffs</i> ,)	[Consolidated case]
v.)	
)	
RICK PERRY, <i>et al.</i> ,)	

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

SUMMARY OF CLOSING ARGUMENTS – 2011 CONGRESS

The Texas State Conference of NAACP Branches, Juanita Wallace, Rev. Bill Lawson, and Howard Jefferson (hereinafter, “NAACP Plaintiffs”) respectfully submit the following summary of closing arguments with respect to the 2011 Texas congressional redistricting plan, in advance of oral arguments to be presented on August 26, 2014.

I. INTRODUCTION

In their 3rd Amended Complaint, the NAACP Plaintiffs assert that the 2011 congressional plans violate both the Fourteenth Amendment and Section 2 of the Voting Rights—thus asserting both intent and effect claims. The NAACP Plaintiffs incorporate by reference the facts relevant

to their claims in their post-trial brief from 2011 (hereinafter, “NAACP 2011 Post-Trial Brief,” ECF No. 407, October 7, 2011), and further highlight for the Court the following law and facts.

II. INTENT CLAIMS

Like with the 2011 House Plan, the 2011 Congressional plan is infected with discriminatory intent. The enacted congressional redistricting plan C185 manifests an intent to discriminate against voters based on race and an intent to dilute and minimize the voting strength of minority voters.

Claims of intentional discrimination under the Fourteenth Amendment are adjudicated under the standard announced in *Arlington Heights v. Metropolitan Housing Dev. Corp.*, 429 U.S. 252, 165-66 (1977). Plaintiffs are not required to produce a “smoking gun” or to prove that racial considerations predominated over all other considerations. *Id.* Instead, in *Arlington Heights*, the Supreme Court identified the kinds of indirect evidence that establish a prima facie case of intentional discrimination, including evidence of discriminatory effect, the history and events surrounding the government’s actions, any departure from usual procedures, and discriminatory statements in the legislative history. *Id.* at 266-68. While evidence of discriminatory effect is usually not sufficient to succeed on a Fourteenth Amendment intentional discrimination claim, the Court has acknowledged that sometimes the impact of a challenged law may be so clearly discriminatory as to allow no other explanation than it was adopted for a discriminatory purpose. *Id.* at 266.

The record in this case is replete with the kind of circumstantial evidence of discriminatory intent described in *Arlington Heights*. Though not an exhaustive list, some of the most glaring pieces of evidence are: (1) the failure to create any additional minority opportunity districts; (2) the obvious and inexplicable fracturing of minority communities into districts in

which they would not be able to exercise any political power; (3) the removal of economic engines and district offices from districts represented by minority members; (4) the departures from typical legislative process; and (5) the tenuous and disingenuous non-racial justifications offered by the state and its mapdrawers.

First and foremost, the most glaring evidence of the state's intent to discriminate against voters of color is the fact that, despite 90% of the state's population growth coming from minority population growth, resulting in the allocation of four new congressional districts to the state, the state created no additional minority opportunity districts, and in fact destroyed one crossover district. Tr., Aug. 14, 2014, 1384:24-1385:25 (Murray). Additional congressional districts are allocated on the basis of total population, not citizen voting age population. And yet the state's mapdrawers and decision-makers admitted that they refused to draw any minority opportunity districts that were not absolutely compelled by law. Additionally, those mapdrawers and decision-makers admitted that they knew that districts that were not majority black would still enable black voters to elect their candidates of choice. Tr., July 18, 2014, 1570:9-17 (Interiano). Just because the Voting Rights Act might not compel a district does not absolve the state of its discriminatory refusal to draw it. Even with these admissions, they resisted at every turn drawing districts that would create additional opportunities for the population who earned the state four new congressional districts. This is undeniable evidence of discriminatory motivation.

Additionally, the state engaged in a systematic and purposeful practice of fracturing African-American and Latino communities, both internally and from each other, across the state. This intentional fracturing had the anticipated effect of diluting the ability of these voters to elect their candidates of choice. Despite concentrated growth patterns, the state declined to draw

compact, naturally-occurring house districts that would recognize that growth, and instead to draw irregularly-shaped districts that fragmented minority populations—this is the very essence of intentional vote dilution and a violation of the Fourteenth Amendment. Tr., Aug. 14, 2014, 1395:4-23 (Murray); Tr., Aug. 12, 2014, 407:6-408:6 (Arrington).

One of the most egregious examples is in Tarrant County. Mapdrawers extended a tentacle from Congressional District 6 in Denton County down into Tarrant County to extract the Latino population. Black voters in Tarrant County were separated from neighboring Latino communities and kept wholly within Congressional District 12. DOJ Ex. 630. Black and brown voters living side by side in Fort Worth were thus teased apart and stranded in districts in which neither would be able to elect their candidates of choice. Tr., Aug. 14, 2014, 1181:6-1182:17 (Moss).

This strategic fracturing was also evidenced in Travis County. Voters in that county have a long and demonstrated history of multi-racial coalition. C185 destroys that coalition, removing Latino voters for inclusion in a San Antonio-based district and fracturing the African American population in East Austin into several districts, none of which will elect the candidate of choice of black voters. Tr., Aug. 13, 2014, 1025:20-1026:3 (Travillion); Tr., Aug. 13, 2014, 817:14-118:22 (Rodriguez). Finally, the fracturing of historic and politically active African-American communities was rampant in Harris County as well, with communities like Third Ward/MacGregor neighborhood being fractured amongst districts. Tr., Aug. 15, 2014, 1451:7-1452:8 (Murray). Across the board, this fracturing was so precise, and so destructive that it can be explained only by an intent to undermine the emerging political power of minority voters.

The precise and consistent removal of economic engines from the districts represented by minority Congresspersons is further evidence of discriminatory motive. To be sure, whenever

redistricting takes place, and district lines have to be changed in order to accommodate population growth or additional districts, there is the potential for the loss of economic engines. But the districts represented by the African-American congresspersons needed very little change with respect to population. And none of the districts were geographically shifted in any significant way. Instead, precise surgery was performed on the edges of the districts, needlessly removing areas of economic growth—areas with little population—for no explicable reason. The ability to elect a candidate of choice is significant for more than just the mere election of that candidate—it is about the tangible benefits that flow from that ability. A candidate responsive to the community’s needs will bring economic generators that will benefit that community. The removal of economic generators from minority districts that did not need modification for population or geographic reasons constitutes an invidious taking to the detriment of the voters in those districts. Likewise, the removal of district offices from those districts is also problematic. While a small handful of Anglo members of Congress did lose their district offices, that still does not explain how all three African American members lost their district office. The consistent harm inflicted on these districts by the lines drawn in C185 just reinforce the unavoidable conclusion that discrimination was a motivating factor.

The abnormal process at play in the legislative process that led to the enactment of C185 is more evidence of intent. The legislature conducted “public hearings” before there was any census data available, well before any redistricting maps had been developed, and no substantive content from those hearings was collected or disseminated. Indeed, it is also clear that transcripts of at least some of these public hearings were not even available until after the special session ended. The legislature rushed the process through a single 20-day special session, even though there was no limit on the number of special sessions that could be called and no chance

that the Legislative Redistricting Board would assume control of the redistricting process. Tr., Aug. 11, 2014, 341:9-15 (Seliger). This unnecessary rush cemented the exclusion of meaningful input from affected voters.

Legislative leadership consistently left minority legislators out in the cold, not revealing to them as they did to other Anglo representatives how the plan was developing. *See* NAACP 2011 Post-Trial Brief, at 43-49. In fact, Rep. Marc Veasey repeatedly asked Rep. Burt Solomons whether draft congressional maps had been submitted, particularly from the Texas congressional delegation, and asked to see those maps. Tr., Aug. 14, 2014, 1276:20-1279:13 (Solomons). Despite those requests, Rep. Solomons never revealed that the delegation had delivered a map on April 4, 2011, nor did he share those maps. *Id.*

Finally, the state's non-racial justifications are undermined by the suspect credibility of its primary mapdrawers, Gerardo Interiano and Ryan Downton, and that warrants the conclusion that racial animus was a motivating factor. Downton, the primary line-drawer for the congressional plan, claimed to have been motivated to completely cleave the Latino community from the African American community in Tarrant County because he read on a Democratic blog that the first publicly available plan, C125, split the Latino community within Tarrant County. Tr., Aug. 15, 2014, 1627:19-1628-15 (Downton). His explanations for why the CD 6 lightning bolt in Tarrant County shifted so precisely to capture the Latino community also strains credibility, and are inconsistent with each other. Tr., Aug. 15, 2014, 1612:7-16; 1614:1-11 (Downton). Over the course of the litigation, stories and justifications have changed, and the end result is still undeniable—minority voters suffered substantial harms in C185.

With regard to Gerardo Interiano, despite his assertions that he was not using racial shading on a census block level, it is simply implausible that a mapdrawer with approximately

1,000 hours of training on RedAppl, drawing protected minority districts, would not be using that basic feature of the software. Tr., July 18, 2014, 1599:22-24. He also asserted, implausibly, that he did not know at the time that election data was not reliable below the precinct level. *Id.* at 1590: 14-25. Again, this is simply implausible given the hours he spent training on the software. Instead, in example after example after example, district lines carefully split precincts, below which accurate political data was not available, in a way that was clearly designed to split apart naturally-occurring minority communities and minimize their political power.

Finally, the justification proffered by the state that C185 was motivated solely by an intent to discriminate against Democrats is a disingenuous ploy that relies on a plainly incorrect reading of Fourteenth Amendment precedent. The racial gerrymandering cases that the state has relied upon apply in situations in which abnormal shapes of districts are just as explainable by partisan reasons as they are by racial reasons. This is not the case here, where the legislature refused to share control of the newly-allocated congressional districts with the very population that earned Texas those districts. Moreover, those cases cannot be read as a free pass to discriminate against voters of color, long marginalized and excluded from the political process, simply because of the way that they vote. Such a reading would undermine the very intent behind the Equal Protection Clause.

These, and all the factors cited in the NAACP's 2011 Post-Trial Brief, support a conclusion that the 2011 legislature acted with unconstitutional racial animus.

III. SECTION 2 CLAIMS

Section 2 of the Voting Rights Act of 1965 prohibits what is known as "vote dilution" in redistricting plans. A plaintiff may prove a Section 2 claim by first establishing the three *Gingles* preconditions: (1) that the minority group in question is "sufficiently large and

geographically compact to constitute a majority in a single-member district; (2) that the minority group is “politically cohesive”; and (3) that the “majority votes sufficiently as a bloc to enable it...usually to defeat the minority’s preferred candidate.” *Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986). If the three *Gingles* preconditions are proven, a reviewing court must then determine whether the “totality of circumstances” indicates that minority voters have been denied equal opportunity to participate in the political process. *Johnson v. DeGrandy*, 512 U.S. 997, 1009-12 (1994).

As it did with regard to the 2011 House case, the state reiterated relevance objections to post-2011 population and election data presented by the NAACP Plaintiffs. As discussed in more detail in the Summary of Closing Arguments for the 2011 House case and adopted herein, such post-enactment evidence is highly relevant and probative in regards to the NAACP’s claims.

As with the 2011 House case, the NAACP Plaintiffs called expert witness Anthony Fairfax to testify about the current (2014) population of proposed districts, relevant to the first prong of *Gingles*. In order to conduct this analysis, Mr. Fairfax utilized the 2008-2012 5-year American Community Survey citizen voting age population data. Tr., July 16, 2014, 889: 13-15 (Fairfax). The Fifth Circuit and others have explicitly recognized that in regards to a Section 2 claim, updated population data (that is, something other than decennial census data), can be considered as part of the first *Gingles* precondition analysis if that non-decennial census data is convincing and reliable. *Valdespino v. Alamo Heights Indep. Sch. Dist.*, 168 F.3d 848, 853 (5th Cir. 1999) (affirming district court’s reliance on post-decennial census changes in housing stock in analysis of first prong of *Gingles*); *Johnson v. DeSoto Co. Bd. of Commr’s*, 204 F.3d 1335,

1341-42 (11th Cir. 2000) (affirming district court's reliance on post-decennial census voter registration data in analysis of first *Gingles* prong).

Furthermore, as discussed earlier, the methodology that Mr. Fairfax employed in making his population projections is clear, cogent and convincing, and has a high degree of accuracy. Fairfax 2/28/14 Report, at p. 7 (reporting a 97.4% accuracy rate for HCVAP in CD 34, a 98.4% accuracy rate for BCVAP in CD 34, a 98.1% accuracy rate for HCVAP in CD 35, and a 98.7% accuracy rate for BCVAP in C 35). It thus satisfies the legal requirements necessary for its use to establish the first prong of *Gingles*. Unlike in other cases where population projections were found to be too unreliable to supplant decennial census data, *Perez v. Pasadena I.S.D.*, 958 F. Supp. 1196, 1211 (S.D. Tex. 1997), *aff'd*, 165 F.3d 368 (5th Cir. 1999), and *McNeil v. Springfield Park District*, 851 F.2d 937, 946 (7th Cir. 1988), Mr. Fairfax's analyses employed several distinguishing (and validating) elements, which were discussed in detail in earlier briefing for this Court.

Finally, as demonstrated in the NAACP Plaintiffs' 2011 Post-Trial Brief, an analysis of the Senate Factors reveals ample evidence of the need to create new minority opportunity districts in many areas across the state. *See* NAACP 2011 Post-Trial Brief, at 35-43.

A. Congressional District 34 in C193

Plan C193 is the demonstrative plan developed by the NAACP in 2011 and proffered throughout this litigation. It is not a full plan, but contains new minority opportunity districts which establish that the NAACP can satisfy the first prong of *Gingles*. In the Dallas-Fort Worth region, Plan C193 draws two new minority opportunity districts: CD 34 and CD 35. Additional minority representation in the DFW Metroplex is desperately needed because minority voters in

Anglo districts are referred to Congresswoman Eddie Bernice Johnson for attention to their concerns. Tr., Aug. 14, 2014, 1185:24-1186:23 (Moss).

Congressional district 34 in C193 is a coalition district and would enable minority voters to elect their candidate of choice in the southern parts of Dallas and Tarrant County. While this district was a majority minority district in 2011 (32.4% BCVAP, 15.8% HCVAP, 4.2% Asian CVAP, and 46.0% Anglo—Ex. 2011 Joint Maps J-25, Red-100, Red-106), Mr. Fairfax's analysis, presented in the 2014 trial, indicates that the district's minority population has grown in the ensuing years. According to Mr. Fairfax's testimony, Congressional District 34 in C193 would, as of 2014, be 37.07% BCVAP and 19.49% HCVAP, for a combined black and Latino CVAP of 56.56%. Tr., August 13, 2014, 804:25-805:8 (Fairfax).

Tarrant County experienced explosive population growth over the last decade, the overwhelming majority of which was minority population growth. Fort Worth was the fastest growing city in the entire country, and grew by approximately 250,000 people over the last decade. Tr., Aug. 14, 2014, 1173:23-1174:2 (Moss). Dallas County also saw significant minority population growth. From 2000 to 2010, the minority population of Dallas grew by 350,000, and the Anglo population decreased by almost 200,000. Tr., July 17, 2014, 1423:2-9 (Korbel). Areas in these counties where the greatest minority population growth occurred were divided amongst several districts, with heavy minority populations being carved out and added to already existing minority districts or stranded in rural-dominated districts. Tr., Aug. 14, 2014, 1181:1-1184:8 (Moss).

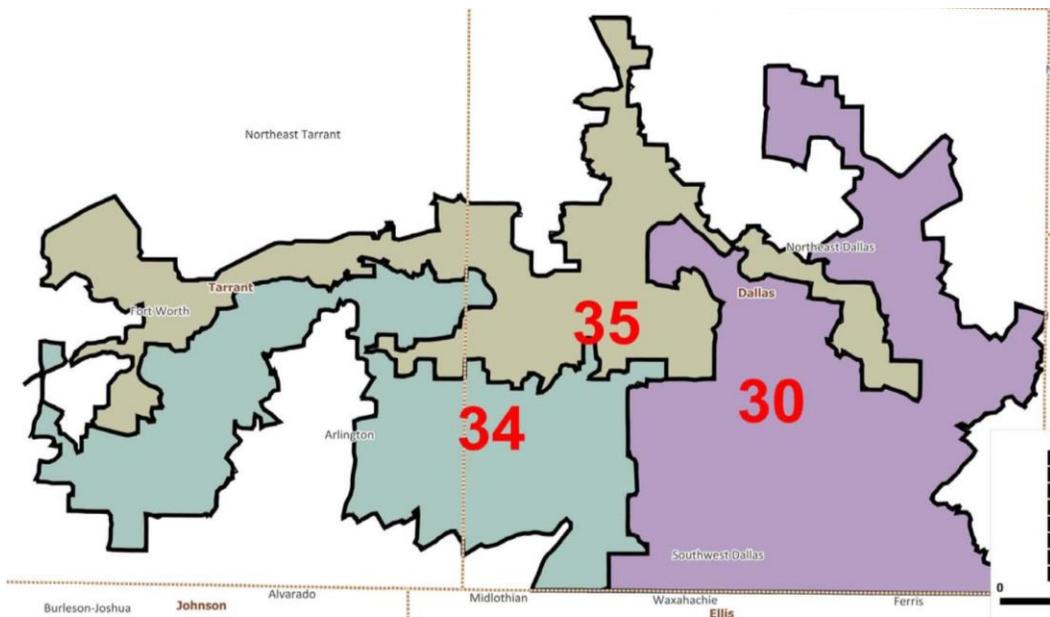
In addition, minority voters in Dallas and Tarrant Counties have a demonstrated ability to work in coalition to elect their candidates of choice. In addition to the lay testimony presented in the 2011 trial (*see* NAACP 2011 Post-Trial Brief at 21-29, 32-33, Testimony of Congressperson

Eddie Bernice Johnson, Charlie Chen), Dr. Juanita Wallace and Raul Magdaleno both testified to the incredible record of political cohesion between black and Latino voters in Dallas County. African American and Latino voters worked together to elect Elba Garcia to the Dallas County Commission. Tr., July 15, 2014, 568:1-569:10. Dr. Wallace, an African-American, and Bea Martinez, a Latina, coordinated their campaigns for the Dallas school board so that they could maximize support for both candidates from the African American and Latino community, and they held many joint events together. *Id.* at 566:1-567:14. Testimony indicated that for black and brown voters to achieve any success in Tarrant County, it was absolutely necessary that they work together cohesively. This Court heard testimony from Franklin Moss, who was repeatedly elected to Fort Worth City Council from an African-American and Latino coalition district. Tr., Aug. 14, 2014, 1175:12-1176:20 (Moss).

African-American and Latino voters in Dallas and Tarrant Counties face many of the same hurdles in day to day life. These communities suffer from lack of access to health care, lack of fair educational opportunities and persistent economic disparities. Tr., July 17, 2014, 1134:1-1135:5 (Magdaleno). Schools in Dallas County are still highly segregated, with black and Latinos being concentrated in some schools, and Anglos in others. Tr., July 15, 2014, 572:2-9 (Wallace). Indeed, the testimony before the court includes evidence of a consistent lack of political responsiveness from Anglo elected officials to minority requests for assistance such that minority constituents of the Anglo elected officials had to seek the assistance of the minority elected officials in Dallas County. Dr. Wallace also testified to the consistent opposition of the Anglo voters to candidates of choice of the minority community in Dallas County. All of these factors, and others cited in the NAACP's 2011 Post-Trial Brief, demonstrate that black and

Latino voters are cohesive and that the totality of circumstances warrants a Section 2 remedy in Dallas County.

Finally, CD 34 is a compact district, well within the norms of the compactness of the enacted districts. CD 34 encompasses a community of interest—the growing African American population along the I-20 corridor. *Tr.*, Aug. 14, 2014, 1185:5-23 (Moss). While it is true that CD 34 is a coalition district, it is also quite comparable to CD 33 in the interim plan constructed by this Court—a district that recognizes a naturally-occurring minority population in the region.



B. Congressional District 35 in C193

The NAACP’s plan C193 also created an additional Latino opportunity district in Dallas and Tarrant Counties. Even though this district was majority minority and near majority Latino citizen voting age population in 2011 (15.0% BCVAP and 44.6% HCVAP, 2011 Ex. Joint Maps J-25, Red-100, Red-106), Mr. Fairfax’s unrebutted testimony once again demonstrates that the population gains seen from 2000 to 2010 have continued through 2014. As of 2014, Congressional District 35 is now 51.92% HCVAP. *Tr.*, Aug. 13, 2014, 805:17-25 (Fairfax). Thus, the NAACP has now demonstrated that it **is** possible to draw an additional Latino

opportunity district in the DFW region that is above 50% HCVAP. As seen above, CD 35 is a reasonably compact district that encompasses a compact minority population. It is only in two counties, and all within one urban region. For all the reasons described above and in previous briefing, Section 2 of the Voting Rights Act mandates a remedy district for Latino voters in this region of the state.

C. Congressional District 25

Defendants admit to destroying Congressional District 25 in Travis County, despite knowing that it was a district in which a diverse group of minority voters elected the candidate of their choice, Lloyd Doggett. Tr., Aug. 15, 2014, 1705:23-25; 1785:4-11 (Downton). This callous disregard for proven voting rights gains from an extent cohesive minority population is certainly evidence of an intent to discriminate, but even if motivated by mistake rather than by animus, this reasoning cannot save Defendants from liability under the effects prohibition of Section 2.

Prior to the enactment of C185, CD 25 was a compact, naturally-occurring and tri-ethnic crossover district whose voters had a proven track record of being politically cohesive and electing their candidate of choice. Tr., Aug. 13, 2014, 827:21-828:5 (Rodriguez). Plan C193, like many other demonstrative plans offered in this litigation, restores CD 25, drawing it as a district that was, as of 2011, 14.6% BCVAP, 29.1% HCVAP and 51.6% Anglo CVAP. Ex. 2011 Joint Maps J-25, Red-100, Red-106. The destruction of this district was incredibly harmful to minority voters in this county, and must be remedied.

IV. CONCLUSION

For all of the foregoing reasons, and those enumerated in the NAACP's 2011 Post-Trial Brief, the NAACP Plaintiffs respectfully submit to the Court that the 2011 congressional

redistricting plan (C185) violates both the Fourteenth Amendment and Section 2 of the Voting Rights Act.

Dated this, the 21st of August.

Respectfully submitted,

/s/ Allison J. Riggs
Anita S. Earls
N.C. State Bar No. 15597
(Admitted Pro Hac Vice)
Allison J. Riggs
N.C. State Bar No. 40028
(Admitted Pro Hac Vice)
Lawrence S. Ottinger
(Admitted Pro Hac Vice)
Southern Coalition for Social Justice
1415 West Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380
Fax: 919-323-3942
Anita@southerncoalition.org
Allison@southerncoalition.org

Robert Notzon
Law Office of Robert S. Notzon
State Bar Number 00797934
1507 Nueces Street
Austin, TX 78701
512-474-7563
512-474-9489 fax
Robert@NotzonLaw.com

Victor L. Goode
Assistant General Counsel
NAACP
4805 Mt. Hope Drive
Baltimore, MD 21215-3297
Telephone: 410-580-5120
Fax: 410-358-9359
vgoode@naacpnet.org

*Attorneys for the Texas State Conference of
NAACP Branches, Wallace and Lawson*

/s/ Gary L. Bledsoe

Gary L. Bledsoe
Potter Bledsoe, LLP
State Bar No. 02476500
316 West 12th Street, Suite 307
Austin, Texas 78701
Telephone: 512-322-9992
Fax: 512-322-0840
Garybledsoe@sbcglobal.net

Attorney for Howard Jefferson

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via the Court's electronic notification system or email to the following on August 21, 2014:

DAVID RICHARDS
Texas Bar No. 1684600
Richards, Rodriguez & Skeith LLP
816 Congress Avenue, Suite 1200
Austin, TX 78701
512-476-0005
davidr@rrsfirm.com

RICHARD E. GRAY, III
State Bar No. 08328300
Gray & Becker, P.C.
900 West Avenue, Suite 300
Austin, TX 78701
512-482-0061
512-482-0924 (facsimile)
Rick.gray@graybecker.com
ATTORNEYS FOR PLAINTIFFS PEREZ, DUTTON, TAMEZ, HALL, ORTIZ, SALINAS,
DEBOSE, and RODRIGUEZ

JOSE GARZA
Texas Bar No. 07731950
Law Office of Jose Garza
7414 Robin Rest Dr.
San Antonio, Texas 78209
210-392-2856
garzpalm@aol.com

MARK W. KIEHNE
mkiehne@lawdcm.com
RICARDO G. CEDILLO
rcedillo@lawdcm.com
Davis, Cedillo & Mendoza
McCombs Plaza
755 Mulberry Ave., Ste. 500
San Antonio, TX 78212
210-822-6666
210-822-1151 (facsimile)

ATTORNEYS FOR MEXICAN AMERICAN LEGISLATIVE CAUCUS
NINA PERALES
Texas Bar No. 24005046

nperales@maldef.org
MARISA BONO
mbono@maldef.org
REBECCA MCNEILL COUTO
rcouto@maldef.org
Mexican American Legal Defense
and Education Fund
110 Broadway, Suite 300
San Antonio, TX 78205
(210) 224-5476
(210) 224-5382 (facsimile)

MARK ANTHONY SANCHEZ
masanchez@gws-law.com
ROBERT W. WILSON
rwwilson@gws-law.com
Gale, Wilson & Sanchez, PLLC
115 East Travis Street, Ste. 1900
San Antonio, TX 78205
210-222-8899
210-222-9526 (facsimile)

ATTORNEYS FOR PLAINTIFFS TEXAS LATINO REDISTRICTING TASK FORCE,
CARDENAS, JIMENEZ, MENENDEZ, TOMACITA AND JOSE OLIVARES, ALEJANDRO
AND REBECCA ORTIZ

ROLANDO L. RIOS
Law Offices of Rolando L. Rios
115 E Travis Street
Suite 1645
San Antonio, TX 78205
210-222-2102
rrios@rolandorioslaw.com

ATTORNEY FOR INTERVENOR-PLAINTIFF HENRY CUELLAR

JOHN T. MORRIS
5703 Caldicote St.
Humble, TX 77346
(281) 852-6388
johnmorris1939@hotmail.com
Served via electronic mail

JOHN T. MORRIS, PRO SE

MAX RENE HICKS

Law Office of Max Renea Hicks
101 West Sixth Street
Suite 504
Austin, TX 78701
(512) 480-8231
512/480-9105 (fax)
rhicks@renea-hicks.com

ATTORNEY FOR PLAINTIFFS CITY OF AUSTIN, TRAVIS COUNTY, ALEX SERNA,
BEATRICE SALOMA, BETTY F. LOPEZ, CONSTABLE BRUCE ELFANT, DAVID
GONZALEZ, EDDIE RODRIGUEZ, MILTON GERARD WASHINGTON, and SANDRA
SERNA

CHAD W. DUNN
chad@brazilanddunn.com
K. SCOTT BRAZIL
scott@brazilanddunn.com
Brazil & Dunn
4201 FM 1960 West, Suite 530
Houston, TX 77068
281-580-6310
281-580-6362 (facsimile)

ATTORNEYS FOR INTERVENOR-DEFENDANTS TEXAS DEMOCRATIC PARTY and
BOYD RICHIE

STEPHEN E. MCCONNICO
smconnico@scottdoug.com
SAM JOHNSON
sjohnson@scottdoug.com
S. ABRAHAM KUCZAJ, III
akuczaj@scottdoug.com
Scott, Douglass & McConnico
One American Center
600 Congress Ave., 15th Floor
Austin, TX 78701
(512) 495-6300
512/474-0731 (fax)

ATTORNEYS FOR PLAINTIFFS CITY OF AUSTIN, TRAVIS COUNTY, ALEX SERNA,
BALAKUMAR PANDIAN, BEATRICE SALOMA, BETTY F. LOPEZ, CONSTABLE
BRUCE ELFANT, DAVID GONZALEZ, EDDIE RODRIGUEZ, ELIZA ALVARADO, JOSEY
MARTINEZ, JUANITA VALDEZ-COX, LIONOR SOROLA-POHLMAN, MILTON
GERARD WASHINGTON, NINA JO BAKER, and SANDRA SERNA

GERALD H. GOLDSTEIN
State Bar No. 08101000

ggandh@aol.com
DONALD H. FLANARY, III
State Bar No. 24045877
donflanary@hotmail.com
Goldstein, Goldstein and Hilley
310 S. St. Mary's Street
29th Floor, Tower Life Bldg.
San Antonio, TX 78205-4605
210-226-1463
210-226-8367 (facsimile)

PAUL M. SMITH
psmith@jenner.com
MICHAEL B. DESANCTIS
mdesantis@jenner.com
JESSICA RING AMUNSON
jamunson@jenner.com
Jenner & Block LLP
1099 New York Ave., NW
Washington, D.C. 20001
202-639-6000
Served via electronic mail

J. GERALD HEBERT
191 Somerville Street, # 405
Alexandria, VA 22304
703-628-4673
hebert@voterlaw.com
Served via electronic mail

JESSE GAINES
P.O. Box 50093
Fort Worth, TX 76105
817-714-9988

ATTORNEYS FOR PLAINTIFFS QUESADA, MUNOZ, VEASEY, HAMILTON, KING and
JENKINS

LUIS ROBERTO VERA, JR.
Law Offices of Luis Roberto Vera, Jr. & Associates
1325 Riverview Towers
111 Soledad
San Antonio, Texas 78205-2260
210-225-3300
irvlaw@sbcglobal.net

GEORGE JOSEPH KORBEL
Texas Rio Grande Legal Aid, Inc.
1111 North Main
San Antonio, TX 78213
210-212-3600
korbellow@hotmail.com

ATTORNEYS FOR INTERVENOR-PLAINTIFF LEAGUE OF UNITED LATIN AMERICAN
CITIZENS

DAVID MATTAX
david.mattax@oag.state.tx.us
DAVID J. SCHENCK
david.schenck@oag.state.tx.us
MATTHEW HAMILTON FREDERICK
matthew.frederick@oag.state.tx.us
ANGELA V. COLMENERO
angela.colmenero@oag.state.tx.us
ANA M. JORDAN
ana.jordan@oag.state.tx.us
Office of the Attorney General
P.O. Box 12548, Capitol Station
Austin, TX 78711
(512) 463-2120
(512) 320-0667 (facsimile)

ATTORNEYS FOR DEFENDANTS STATE OF TEXAS, RICK PERRY, HOPE ANDRADE,
DAVID DEWHURST, AND JOE STRAUS

DONNA GARCIA DAVIDSON
PO Box 12131
Austin, TX 78711
(512) 775-7625
(877) 200-6001 (facsimile)
donna@dgdllawfirm.com

FRANK M. REILLY
Potts & Reilly, L.L.P.
P.O. Box 4037
Horseshoe Bay, TX 78657
512/469-7474
512/469-7480 (fax)
reilly@pottsreilly.com

ATTORNEYS FOR DEFENDANT STEVE MUNISTERI

DAVID ESCAMILLA
Travis County Asst. Attorney
P.O. Box 1748
Austin, TX 78767
(512) 854-9416
david.escamilla@co.travis.tx.us
Served via electronic mail

ATTORNEY FOR PLAINTIFF TRAVIS COUNTY

KAREN M. KENNARD
2803 Clearview Drive
Austin, TX 78703
(512) 974-2177
512-974-2894 (fax)
karen.kennard@ci.austin.tx.us
Served via electronic mail

ATTORNEY FOR PLAINTIFF CITY OF AUSTIN

JOAQUIN G. AVILA
P.O. Box 33687
Seattle, WA 98133
206-724-3731
206-398-4261 (facsimile)
jgavotingrights@gmail.com
Served via electronic mail

ATTORNEYS FOR MEXICAN
AMERICAN LEGISLATIVE CAUCUS

/s/ Allison J. Riggs
Allison J. Riggs
Attorney for Texas NAACP, Bill Lawson, and Juanita Wallace