LATHAM & WATKINS LLP
Steven M. Bauer (Bar No. 135067)
steven.bauer@lw.com
Sadik Huseny (Bar No. 224659)
sadik.huseny@lw.com
Shannon D. Lankenau (Bar. No. 294263)
shannon.lankenau@lw.com
505 Montgomery Street, Suite 1900
San Francisco, California 94111
Telephone: 415.391.0600
Facsimile: 415.395.8095

LATHAM & WATKINS LLP
Richard P. Bress (admitted *pro hac vice*)
rick.bress@lw.com
Melissa Arbus Sherry (admitted *pro hac vice*)
melissa.sherry@lw.com
Anne W. Robinson (admitted *pro hac vice*)
anne.robinson@lw.com
Tyce R. Walters (admitted *pro hac vice*)
tyce.walters@lw.com
Genevieve P. Hoffman (admitted *pro hac vice*)
genevieve.hoffman@lw.com
Gemma Donofrio (admitted *pro hac vice*)
gemma.donofrio@lw.com
555 Eleventh Street NW, Suite 1000
Washington, D.C. 20004
Telephone: 202.637.2200
Facsimile: 202.637.2201

LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW
Kristen Clarke (*pro hac vice* forthcoming)
kclarke@lawyerscommittee.org
Jon M. Greenbaum (Bar No. 166733)
jgreenbaum@lawyerscommittee.org
Ezra D. Rosenberg (*pro hac vice* forthcoming)
erosenberg@lawyerscommittee.org
Dorian L. Spence (*pro hac vice* forthcoming)
dspence@lawyerscommittee.org
Maryum Jordan (*pro hac vice* forthcoming)
mjordan@lawyerscommittee.org
Ajay Saini (*pro hac vice* forthcoming)
asaini@lawyerscommittee.org
Pooja Chaudhuri (Bar No. 314847)
pchaudhuri@lawyerscommittee.org
1500 K Street NW, Suite 900
Washington, DC 20005
Telephone: 202.662.8600
Facsimile: 202.783.0857

Attorneys for Plaintiffs National Urban League; City of San Jose, California; Harris County, Texas; League of Women Voters; King County, Washington; Black Alliance for Just Immigration; Rodney Ellis; and Adrian Garcia
[additional counsel on docket]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NATIONAL URBAN LEAGUE; LEAGUE OF WOMEN VOTERS; BLACK ALLIANCE FOR JUST IMMIGRATION; HARRIS COUNTY, TEXAS; KING COUNTY, WASHINGTON; CITY OF LOS ANGELES, CALIFORNIA; CITY OF SALINAS, CALIFORNIA; CITY OF SAN JOSE, CALIFORNIA; RODNEY ELLIS; and ADRIAN GARCIA,

Plaintiffs,

v.

WILBUR L. ROSS, JR., in his official capacity as Secretary of Commerce; U.S. DEPARTMENT OF COMMERCE; STEVEN DILLINGHAM, in his official capacity as Director of the U.S. Census Bureau; and U.S. CENSUS BUREAU,

Defendants.

CASE NO. 20-cv-5799-LHK

DECLARATION OF ADRIAN GARCIA IN SUPPORT OF PLAINTIFFS' MOTION FOR STAY AND PRELIMINARY INJUNCTION

DECLARATION OF ADRIAN GARCIA

I, Adrian Garcia, hereby declare:

1. I am a Plaintiff in this action and a resident of Harris County, Texas, where I have resided since 1960. I reside at 508 Sue St, Houston, TX 77009. The facts stated herein are true and correct based on my own personal knowledge.

2. I am the Commissioner of Precinct Two on the Harris County Commissioner's Court. The Precinct I represent includes parts of the City of Houston, where I reside, as well as Harris County.

3. An undercount in Harris County, or in Houston, during the 2020 Census as compared to other metropolitan areas in the country, or as compared to the rest of the state of Texas, would cause harm to me and my community.

4. For instance, an undercount can lead to loss of crucial federal funds for programs that affect my daily life.

5. I have 514,700 children enrolled in 13 school districts that form part of Precinct 2. These districts include Aldine, Channelview, Crosby, Clear Creek, Deer Park, Galena Park, Goose Creek, Huffman, Humble, La Porte, Pasadena, Sheldon and the Houston Independent School District ("HISD") system. These districts receive millions of dollars in essential federal funding. This includes Title I federal funding.

6. An undercount on the 2020 Census for Harris County that results in decreased Title I funds for these districts would deprive these children's school districts of necessary funding.

7. I also routinely use roads and highways in Harris County. This includes driving, and biking along roads all throughout the county.

8. Again, Harris County depends on millions of dollars of federal funding to maintain roads and highways throughout the county.

9. An undercount on the 2020 Census for Harris County that results in decreased federal funding for roads and highways in the county would potentially lead to deterioration of roads that I use.

10. An undercount on the 2020 Census will also put me at serious risk of political underrepresentation in the U.S. Congress, and in the Texas legislature.

11. First, an undercount of the state of Texas relative to other states such that Texas loses a seat in Congress deprives me of my fair share of representation in the United States House of Representatives.

12. Second, Texas relies on census data to redistrict congressional and state legislative seats. An undercount of Harris County or Houston relative to the rest of the state will lead to the redistribution of seats and will deprive me of my fair share of representation in the state legislature.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 24, 2020 at Houston, Texas.

Adrian Garcia