

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No. 3:21-CV-00259-DCG-JES-JVB
[Lead Case]

**PLAINTIFFS' NOTICE OF JOINT FILING OF CHART OF CLAIMS
TO BE LITIGATED AT PRELIMINARY INJUNCTION HEARING**

Pursuant to the Court's Order of September 25, 2025 [Dkt.1203], Plaintiffs hereby jointly file a chart summarizing, for the preliminary injunction hearing starting October 1, 2025, which Plaintiff groups are challenging which districts, and on which legal bases. As noted in the document, the chart provides information on Plaintiffs' legal challenges in their preliminary injunction motions; the chart does not include information on legal challenges contained in Plaintiffs' supplemental complaints that are not presented in the preliminary injunction motions.

The chart is attached to this submission as Exhibit A.

September 29, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing and attachment was served on all counsel of record on September 29, 2025 via the Court's CM/ECF system.

/s/ Robert S. Notzon

Ex. A

PLAINTIFFS' PRELIMINARY INJUNCTION CHALLENGES TO THE 2025 CONGRESSIONAL MAP (C2333)					
GEOGRAPHY	CLAIM	Gonzales	Brooks/LULAC/MALC	NAACP	Intervenors
HARRIS COUNTY	Unconstitutional intentional racial vote dilution	Dismantling and consolidating majority-minority CDs 9 and 18 into a single Black CVAP majority new CD 18. Creating bare Hispanic CVAP majority new CD 9 that is intentionally dilutive.	Dismantling 2021 map's performing Hispanic CVAP majority CD 29; Dismantling and consolidating majority-minority CDs 9 and 18 into a single Black CVAP majority new CD 18. Creating bare Hispanic CVAP majority new CD 9 that is intentionally dilutive.	Dismantling and consolidating majority-minority CDs 9 and 18 into a single Black CVAP majority new CD 18. Dismantling the 2021 map's performing majority-minority CVAP CD 29. Creating new CD 9 that is intentionally dilutive for Black voters.	Dismantling the 18th Congressional District as a method of intentional vote dilution and discrimination, Black voters in 2 different Congressional districts were combined and placed in the 18th and packed along with other minority voters.
	Unconstitutional racial gerrymandering	CDs 9 and 18	CDs 9 and 18	CD 9	CD18
DALLAS-FT. WORTH METROPLEX	Unconstitutional intentional racial vote dilution	Dismantling of 2021 map's CD 33, consolidating three majority-minority districts (CDs 30, 32, and 33) into just two (new CDs 30 and 33). Intentionally cracking voters from Tarrant County portion of 2021 map's CD 33 into Anglo districts including CD 12 and CD 25.	Dismantling of 2021 map's CD 33, consolidating three majority-minority districts (CDs 30, 32, and 33) into just two (new CDs 30 and 33)	Dismantling of 2021 map's CD 33, consolidating three majority-minority districts (CDs 30, 32, and 33) into just two (new CDs 30 and 33) and intentionally diluting the voting strength of Black voters in CD 32.	The plan intentionally dilutes African American voting strength in CD33, changing it from a naturally occurring district which elected the African American candidate of choice in 7 consecutive elections and the minority candidate of choice to a district. Substantial parts of the district from Tarrant County were severed and placed in another Congressional District as part of a DFW racial gerrymander.
	Unconstitutional racial gerrymandering	CD 30	CDs 30, 32, and 33	CDs 32 and 33	CD33.
CENTRAL TEXAS/ I-35 CORRIDOR	Unconstitutional intentional racial vote dilution	CD35	CD35	CD 35	

Unconstitutional racial gerrymandering				
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CENTRAL TEXAS/ GULF COAST	Unconstitutional intentional racial vote dilution	CD 22 and CD 27 are intentionally shifted from majority-minority to majority-Anglo.	Reduction in Latino voting strength in CD27 to prevent the emergence of a Latino majority opportunity district	N/A	
	Unconstitutional racial gerrymandering	CDs 22 & 27	CD27	N/A	
STATEWIDE	Unconstitutional malapportionment	Statewide - at least two plaintiffs reside in overpopulated districts: CD 22 and CD 25.	N/A	N/A	
	Unconstitutional use of racial data and pursuit of partisan advantage	Statewide	N/A	N/A	