

Nos. 25-0674 & 25-0687

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

**IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS**

Relator.

RESPONDENTS' QUO WARRANTO RECORD

Chad W. Dunn
State Bar No. 24036507
K. Scott Brazil
State Bar No. 02934050
BRAZIL & DUNN, LLP
1900 Pearl Street
Austin, Texas 78705
Telephone: (512) 717-9822

Mimi Marziani
State Bar No. 24091906
Joaquin Gonzalez
State Bar No. 24109935
Rebecca (Beth) Stevens
State Bar No. 24065381
MARZIANI, STEVENS &
GONZALEZ, PLLC
500 W. 2nd Street, Suite 1900
Austin, Texas 78701
Telephone: (210) 343-5604

Amy Warr
State Bar No. 00795708
awarr@adjtlaw.com
Alexandra W. Albright
Rebecca A. Gonzalez-Rivas
Anna M. Baker
ALEXANDER DUBOSE & JEFFERSON LLP
100 Congress Avenue, Suite 1450
Austin, Texas 78701-2709
Telephone: (512) 482-9300

Hannah L. Roblyer
ALEXANDER DUBOSE & JEFFERSON LLP
1844 Harvard Street
Houston, Texas 77008-4342

Kirsten M. Castañeda
ALEXANDER DUBOSE & JEFFERSON LLP
8144 Walnut Hill Lane, Suite 1000
Dallas, Texas 75231-4388

ATTORNEYS FOR RESPONDENTS

RECORD INDEX

Tab	Item
1.	Ana-Maria Rodriguez Ramos Declaration
2.	Chris Turner Declaration
3.	Christina Morales Declaration
4.	Gene Wu Declaration
5.	Gina Hinojosa Declaration
6.	James Talarico Declaration
7.	Jessica González Declaration
8.	John Bucy, III Declaration
9.	LuLu Flores Declaration
10.	Mihaela Plesa Declaration
11.	Ron Reynolds Declaration
12.	Suleman Lalani Declaration
13.	Vikki Goodwin Declaration
14.	Janis Holt X post (Aug. 25, 2025)
15.	Texas House Republican Caucus Media Advisory (Aug. 25, 2025)
16.	Greg Abbott X post (Aug. 29, 2025)

RECORD

TAB 1

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF ANA-MARIA RODRIGUEZ RAMOS

Under penalty of perjury, I declare as follows:

1. My name is Ana-Maria Rodriguez Ramos. I am the Texas State Representative for District 102. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E2.204, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Corresponded daily with legislative staff regarding constituent outreach and casework, planning for town halls, office scheduling, and other routine business;

- Drafted legislation with stakeholders regarding statewide floodplain management standards;
 - Monitored House floor activity and committee meetings; held daily discussions with colleagues regarding the House proceedings and the impact of redistricting legislation;
 - Reviewed, edited, and approved correspondence to constituents, including press releases created in my capacity as Chair of the Texas Legislative Progressive Caucus;
 - Produced legislative materials to distribute to colleagues regarding redistricting, and conducted formal meetings including members and staff in my capacity as Chair of the Texas Legislative Progressive Caucus;
 - Held meetings with my Chief of Staff to discuss office personnel, solicit and review office internships; hired an office employee to assist with administration, and hired an additional employee to assist with constituent services;
 - Met with State Governors, Illinois Congressmembers, and Illinois State Legislators to discuss Texas redistricting efforts;
 - Responded to media requests and conducted interviews to discuss legislation and inform constituents about redistricting in Texas; conducted livestreams with House colleagues to inform constituents of redistricting efforts; and,
 - Participated in town hall meetings with local constituent groups to keep the public informed about the Special Session on redistricting.
4. After returning to Texas, the duties of my office that I have performed include the following:
- Meet with office staff to discuss office operations, legislation, and constituent services;
 - Correspond with constituents and work constituent service cases through communication with Texas state agencies;

- Conduct regular meetings with Texas House colleagues to discuss legislation and the special session;
 - Draft legislation, and draft statements for the Texas House Journal;
 - Complete the hiring and onboarding of new personnel;
 - Distribute to members briefings of legislation on daily house calendars;
 - Schedule and conduct media interviews to discuss legislation and inform constituents about redistricting in Texas; and
 - Conduct Town Halls with other Representatives to discuss legislation and inform constituents about redistricting in Texas.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/Ana-Maria Rodrigues Ramos
Ana-Maria Rodriguez Ramos

RECORD

TAB 2

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF CHRIS TURNER

Under penalty of perjury, I declare as follows:

1. My name is Chris Turner. I am the Texas State Representative for District 101. My date of birth is October 10, 1972. My work address is Texas Capitol, Room 1N.5, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Spoke and corresponded daily with my legislative staff in Austin and Arlington about constituent outreach, casework, planning for town hall meetings, district scheduling and other routine business;

- Worked with staff to address an Oncor power outage in the Central Arlington portion of my district;
 - Reviewed, edited and approved legislative correspondence to constituents—some letter topics included congressional redistricting, bathroom bill, hemp ban and a letter of recommendation for City of Arlington;
 - Reviewed periodic district news clips to stay abreast of local issues;
 - Discussed personnel issues with my Chief of Staff;
 - Worked with staff on edits to district newsletter;
 - Spoke with a constituent about an alleged discrimination incident and connected him with a lawyer;
 - Participated in regularly scheduled check-ins with my chief of staff;
 - Participated in a full staff meeting;
 - Participated in a town hall meeting and calls to keep the public informed about the Texas special session;
 - Worked with staff on PowerPoint for virtual Town Hall meeting for District 101;
 - Worked with staff to finalize locations for in-person town hall meetings on September 6, 2025 to recap regular session;
 - Conducted numerous media interviews discussing legislation (HB 4);
 - Spoke and corresponded with Grand Prairie Police Chief, DPS Director and Chair of House Administration regarding a threat to a constituent.
4. After returning to Texas, I performed the following duties of my office:
- Voted on several bills on the House floor;

- Participated in debate on HB 4;
 - Attended and voted in House Redistricting Committee hearing;
 - Co-authored numerous bills;
 - Met with staff to discuss numerous issues, including:
 - Upcoming committee hearings in State Affairs and Ways and Means;
 - Town Hall meetings; and
 - Newsletter; additional edits.
 - Attended and participated in House State Affairs Hearing;
 - Attended, participated and voted in House Ways & Means hearing;
 - Signed constituent correspondence;
 - Conducted numerous media interviews discussing legislation (HB 4);
 - Corresponded with constituents on legislative proceedings; and
 - Corresponded with issue stakeholders on legislation before State Affairs and Ways & Means Committees.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
 6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ *Chris Turner*
Chris Turner

RECORD

TAB 3

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF CHRISTINA MORALES

Under penalty of perjury, I declare as follows:

1. My name is Christina Morales. I am the Texas State Representative for District 145. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room GN.10, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Corresponded daily with legislative staff regarding constituent outreach and casework, planning for town halls, office scheduling, and other routine business.

- Monitored House floor activity and committee meetings; held daily discussions with colleagues regarding the House proceedings and the impact of redistricting legislation.
 - Reviewed, edited, and approved correspondence to constituents, including press releases.
 - Participated in and planned meetings and town halls with local constituent groups to keep the public informed about the Special Session on redistricting.
 - Appeared as a panelist at the LULAC 2025 Convention concerning the impact of redistricting.
 - Instructed staff to conduct research concerning the effect of HB4 upon constituent neighborhoods.
4. After returning to Texas, the duties of my office that I have performed include the following:
- Met with office staff to discuss office operations, legislation, and constituent services.
 - Held meetings with House colleagues to discuss legislative proceedings; met with staff to discuss office staffing, legislation, committee business, and to plan a legislative town hall.
 - Monitored floor activity and committee meetings.
 - Met with elected officials and constituents to keep the public informed about the Special Session on redistricting.
 - Conducted and scheduled media interviews to discuss legislation and inform constituents about redistricting in Texas and the ongoing Special Session.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or

forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ *Christina Morales*
Christina Morales

RECORD

TAB 4

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF GENE WU

Under penalty of perjury, I declare as follows:

1. My name is Gene Wu. I am the Texas State Representative for District 137. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room GW.5, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Daily meetings with and oversight of staff in monitoring House floor activity and committee meetings, analyzing proposed legislation, assisting constituents, organizing and attending town hall and other meetings with constituents, reaching out to state agencies, and

responding to media requests.

- Conducting multiple interviews and press conferences, and otherwise responding to media requests concerning impact of redistricting legislation.
 - Leading, attending, preparing for, and organizing House Democratic Caucus meetings.
 - Meetings and press conferences with Democratic Party Chair, Illinois Governor, Illinois Lt. Governor, California Speaker and delegation, Kentucky Governor, and other political leaders regarding Texas redistricting efforts.
 - Meetings with former President Barack Obama, and with various Senators and members of Congress regarding Texas redistricting efforts.
4. After returning to Texas, I performed the following duties of my office:
- Prepared for and engaged in debate and voting on the House floor on bills, including redistricting and flooding.
 - Studied and discussed legislation with staff and colleagues.
 - Attended Democratic National Committee meeting.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.
5. I did not solicit, demand or receive, or consent to receive, directly or indirectly, for myself, or for another, from any company, corporation or person, any money, appointment, employment, testimonial, reward, thing of value or employment, or of personal advantage or promise thereof, for my vote or official influence, or for withholding the same, or with any

understanding, expressed or implied, that my vote or official action shall be in any way influenced thereby. I further did not solicit, demand or receive any such money or other advantage matter or thing aforesaid for another as the consideration of my vote or official influence, in consideration of the payment or promise of such money, advantage, matter or thing to another. I did not intentionally or knowingly offer, confer, or agree to confer on another, or solicit, accept, or agree to accept from another any benefit as consideration for my decision, opinion, recommendation, vote, or other exercise of discretion as a public servant. I did not intentionally or knowingly offer, confer, or agree to confer on another, or solicit, accept, or agree to accept from another any benefit as consideration for my decision, vote, recommendation, or other exercise of official discretion in a judicial or administrative proceeding. I did not intentionally or knowingly offer, confer, or agree to confer on another, or solicit, accept, or agree to accept from another any benefit as consideration for a violation of a duty imposed by law on a public servant or party official. I did not intentionally or knowingly offer, confer, or agree to confer on another, or solicit, accept, or agree to accept from another any benefit that is a political contribution as defined by Title 15, Election Code, or that is an expenditure made and reported in accordance with Chapter 305, Government Code, if the benefit was offered, conferred, solicited, accepted, or agreed to pursuant to an express agreement to take or withhold a specific exercise of official discretion if such exercise of official discretion would not have been taken or withheld but for the benefit.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ Gene Wu
Gene Wu

RECORD

TAB 5

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF GINA HINOJOSA

Under penalty of perjury, I declare as follows:

1. My name is Gina Hinojosa. I am the Texas State Representative for District 49. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room 4S.2, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Daily communications with constituents; daily meetings with staff regarding constituent work; daily discussions with stakeholders, staff, and colleagues regarding the impact of redistricting legislation

and strategy for opposing it.

- Oversaw staff activities including monitoring House floor activity and committee meetings, analyzing proposed legislation, assisting constituents, responding to media requests to inform public about redistricting effort, and reviewing Travis County flood control plan.
 - Met with Illinois legislators and California officials regarding Texas redistricting efforts.
4. After returning to Texas, I performed the following duties of my office:
- Prepared for and engaged in debate and voting on the House floor on redistricting bill and flooding bills.
 - Studied and discussed school testing legislation with staff and colleagues.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ Gina Hinojosa
Gina Hinojosa

RECORD

TAB 6

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF JAMES TALARICO

Under penalty of perjury, I declare as follows:

1. My name is James Talarico. I am the Texas State Representative for District 50. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E2.902, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Daily communications with constituents; daily meetings with staff regarding constituent work; daily discussions with stakeholders, staff, and colleagues regarding the impact of redistricting legislation

and strategy for opposing it.

- Oversaw the staff activities of four full-time staffers, including monitoring House floor activity and committee meetings, analyzing proposed legislation, assisting constituents, and reviewing Travis County flood control plan.
 - Met with Illinois legislators and California officials regarding Texas redistricting efforts.
 - Conducted numerous media interviews discussing HB 4 redistricting legislation to inform the Texas public about its impact.
 - Participated in regular bi-weekly full-staff meetings.
4. After returning to Texas, I performed the following duties of my office:
- Reviewed impact of flooding bills.
 - Studied and discussed school testing legislation with staff, colleagues, stakeholders, and the parents of public school students.
 - Participated in House Public Education Committee hearing on school accountability reforms.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ James Talarico
James Talarico

RECORD

TAB 7

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF JESSICA GONZÁLEZ

Under penalty of perjury, I declare as follows:

1. My name is Jessica González. I am the Texas State Representative for District 104. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E2.808, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Worked with my legislative staff in Austin to track the movement of legislation that was considered high priority by the Texas House LGBTQ Caucus.

- Had daily check-ins with my Chief of Staff about the functions of my office, legislative strategy, events in my district, personnel issues, and future constituent outreach.
- Participated in media interviews with outlets of varying reach to inform residents of my district, and of Texas, about the importance of the debate on HB 4, the proposed Congressional redistricting bill, and SB 8, the anti-LGBTQ bill that would place bans on use of public bathrooms and similar facilities.
- Instructed my district staff to participate in a school supply and backpack giveaway that I sponsored at Hector P. Garcia Elementary School in Grand Prairie, in my legislative district, in partnership with local community organizations.
- Participated in press conferences and press calls to inform the public about the importance of the debate on HB 4, the proposed Congressional redistricting bill, and SB 8, the anti-LGBTQ bill that would place bans on use of public bathrooms and similar facilities.
- Discussed legislative strategy on SB 8 with Texas LGBTQIA+ community advocates and interest groups.
- Corresponded with constituents about important issues facing residents of my district.
- Discussed management strategies and staff roles with my Chief of Staff.
- Worked with Reps. Rafael Anchia and Venton Jones to discuss planning joint-district outreach events in the fall.
- Monitored floor activity of the Texas House and Senate.
- Performed legislative and legal research on HB 4 and SB 8.
- Communicated daily with members of the Texas House LGBTQ Caucus about the importance of fighting SB 8 in the Texas House.
- Communicated daily with members of the Texas House Democratic Caucus about the importance of fighting SB 8 and HB 4

in the Texas House.

- Approved external communications, including social media posts, for my office.
4. After returning to Texas, I performed the following duties of my office:
- Attended the House Committee on the Judiciary and Civil Jurisprudence, held on August 20, 2025.
 - Participated in the floor debate on HB 4.
 - Offered a floor amendment to SB 15, and worked with other members offering floor amendments on SB 15.
 - Voted on bills brought before the Texas House.
 - Monitored committee hearings and discussed committee hearings with my legislative staff in Austin.
 - Met extensively with LGBTQIA+ advocates and civil rights organizations to discuss legislative strategy.
 - Organized a “People’s Hearing” for members of the public that wished to testify during the August 22nd hearing of the House Committee on State Affairs.
 - Sat on the dais for the House Committee on State Affairs meeting on August 22nd in the Capitol.
 - Communicated daily with members of the Texas House LGBTQ Caucus about the importance of fighting SB 8 in the Texas House.
 - Communicated daily with members of the Texas House Democratic Caucus about the importance of fighting SB 8 in the Texas House.
 - Approved external communications, including social media posts, for my office.
5. I was compelled by my oath to resist the redistricting legislation that I

believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.

6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ *Jessica González*
Jessica González

RECORD

TAB 8

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF JOHN BUCY, III

Under penalty of perjury, I declare as follows:

1. My name is John Bucy, III. I am the Texas State Representative for District 136. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room GN.9, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - I met daily with Capitol staff concerning new scheduling requests, legislative research and bill drafts, resolutions and notes, constituent calls and emails, and constituent casework.

- I oversaw my staff's constituent casework, which includes responding to constituent emails and constituent calls regarding legislative affairs. This work included helping the following people:
 - Constituent with Attorney General/local prosecutor liaison issue regarding not having Crime Victims Compensation Fund application processed and funds properly dispersed;
 - Parents who are not receiving awarded child support due to issues with new payment system through Attorney General's office;
 - Parent with their child's HHSC Waiver issue and social security eligibility issue (working with staff of local member of Congress);
 - Constituent with a hacked SNAP account;
 - Constituent experiencing difficulty with DSHS certificate;
 - Constituent needing assistance with Williamson County flood relief;
 - Constituent with driver license problem; and
 - Individual with issue regarding contractor in Williamson County.
- I reviewed nominations for the Texas Armed Services Scholarship Program (TASSP).
- I reviewed staff drafts of one-pagers summarizing the 89th Legislative Session and the various propositions on the upcoming constitutional amendment election.
- I wrote and published an op-ed in the Austin American-Statesman.
- I gave multiple interviews with local, state, national, international press, and social media influencers.
- I attended events to inform the public about danger of Texas

redistricting effort.

- I monitored floor proceedings daily.
 - I monitored committee proceedings, including:
 - The Select Committee on Disaster Preparedness;
 - The Select Committee on Congressional Redistricting; and
 - The Public Health Committee meeting concerning HB 5, the hemp-derived THC ban.
 - I supervised my staff as they attended the following community events:
 - Cedar Park Chamber of Commerce Banquet;
 - The United Court of Austin;
 - Williamson County Economic Development Partnership Champion's Luncheon;
 - WilCo Dems Executive Committee Meeting; and
 - Meetings with local stakeholders concerning the Leander ISD bus crash, including members of Leander ISD school board, Leander City Council, and Cedar Park City Council.
4. After returning to Texas, I performed the following duties of my office:
- Attended floor proceedings on August 20-21, and voted on bills and amendments up for debate, including HB 4 on congressional redistricting and multiple flood-relief bills. Spoke in opposition to HB 4.
 - Co-authored HB 1, a flood-relief bill. Filed other bills dealing with voting rights, Medicaid expansion, state employee pay and pension increases, and the right to bodily autonomy.

- Met with the Texas Medical Association and Texas Pediatric Society concerning HB 25, Ivermectin Over the Counter.
 - Attended the Public Health Committee meeting on August 22 concerning HB 25, Ivermectin Over the Counter, and HB 265, requiring a review and rewrite of rules relating to youth camps and changing the composition of the advisory council.
 - Presided over House Elections Committee as Vice-Chair.
 - Attended House Public Health Committee meeting.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ *John Bucy, III*
John Bucy, III

RECORD

TAB 9

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF LULU FLORES

Under penalty of perjury, I declare as follows:

1. My name is Lulu Flores. I am the Texas State Representative for District 51. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E2.310, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Conducted daily check-ins with staff (phone, text message, email) on matters including:
 - updates on the going-on in Austin;
 - constituent requests;

- my calendar for events and engagements in and outside of Texas;
- development of my legislation for the upcoming second special session; and
- communications including social media, upcoming speeches, and the biennial paper newsletter.
- Reviewed notes of Culture, Recreation & Tourism Committee prepared by staff who attended in my absence;
- Read emails from constituents forwarded by staff and directed responses to these messages;
- Attended press briefings with the governors of New York and Illinois;
- Delivered speech at National Women's Political Caucus biennial convention in Sacramento, California;
- Studied and reviewed proposed redistricting maps for impact on my district and constituents;
- Communicated with constituents and other Texans regarding their concerns about the redistricting bill and other issues before the Legislature;
- Attended meetings of the House Democratic Caucus;
- Met with members of the Illinois State Hispanic Caucus and Illinois State Legislature to discuss issues of mutual concern;
- Recorded video for social media presentation of the House Democratic Caucus in support of the 50th anniversary of the Voting Rights Act;
- Gave interviews to press outlets CNN and Telemundo;
- Met with labor leaders and union members;
- Attended press conference on impacts of mid-decade redistricting; and;
- Attended rally in downtown Chicago.

Additionally, I supervised and coordinated my Capitol office staff in the following tasks:

- Daily greeting of constituents visiting the office, answering constituent calls and emails, checking after-hours voicemail messages, and receiving the mail;
- Daily monitoring of my House and district email accounts;
- Daily meetings of chiefs of staff of House members involved in quorum break;
- Attendance at Austin meeting of Border Trade Advisory Committee hearing and recording of notes on proceedings;
- Attendance at hearing of Committee on Culture, Recreation & Tourism and recording of notes on proceedings;
- Assist constituents with problems, including issues with Department of Family and Protective Services, inoperable public housing elevators, recent legislation on telework for state employees, and proposed constitutional amendments;
- Fielding media interview requests for me and coordinating accepted interviews;
- Writing remarks for my presentation at National Women's Political Caucus;
- Adding hundreds of constituents to the Correspondence Management System upon receiving their overwhelmingly supportive email messages regarding the quorum break (as well as a vastly smaller number who did not support it);
- Representing me in my absence at the Dove Springs Back-to-School Bash;
- Coordinating drafting of resolutions honoring the accomplishments of people and organizations in District 51;
- Filing HB 128 (second called session), Relating to workplace heat

illness prevention, including the creation of a heat illness prevention advisory board; imposing administrative penalties;

- Filing HB 135 (second called session), Relating to civil liability for removing certain individuals or animals from a motor vehicle;
- Filing HB 138 (second called session), Relating to the provision of the reason for rejecting a voter registration application;
- Writing, obtaining approval and posting social media informing constituents why House Democrats are launching quorum break;
- Sending encumbrance letter to House Reproduction to encumber funds for Rep. Flores' physical newsletter;
- Writing, obtaining approval and posting social media promoting community event by Congressman Greg Casar;
- Writing, obtaining approval and posting social media informing constituents about my visit with New York Governor Kathy Hochul;
- Holding staff meeting regarding office issues and new policies related to the quorum break and the approaching end of the fiscal year;
- Writing, obtaining approval and posting social media thanking constituents for their support of the quorum break;
- Writing, obtaining approval and posting social media thanking participants for a recent event organized by the Texas Association of Mexican-American Chambers of Commerce;
- Writing, obtaining approval and posting social media informing constituents about ongoing threats against Texas House Democrats;
- Designing an HD-51 Communications Director Job Manual;
- Writing, obtaining approval and posting social media responding to news that Attorney General Paxton was trying to remove Rep. Flores from office;
- Writing, obtaining approval and posting social media informing

constituents about the Dove Springs Back to School Bash;

- Writing, obtaining approval and posting social media informing constituents about a shooting in North Austin;
- Writing, obtaining approval and posting social media calling for flood relief before redistricting; and
- Writing, obtaining approval and posting social media informing constituents about an upcoming citizenship clinic in Austin.

4. After returning to Texas, I performed the following duties of my office:

- Conducted daily in-person check-ins with staff, as well as follow-ups via phone and text messages , on matters including:
 - constituent requests;
 - my calendar for events, engagements, and requests for donations;
 - development and filing of my legislation for the current session; and
 - communications including social media, upcoming speeches, the monthly digital newsletter and the biennial paper newsletter.
- Attended sessions of the House and voted on legislation there;
- Prepared for and attended hearing of the House Committee on Judiciary & Criminal Justice;
- Attended or monitored hearings of House committees;
- Attended meetings of the House Democratic Caucus;
- Attended ribbon cutting of the Robert Rives Gymnasium at the Texas School for the Deaf after passing a proclamation in honor of that event which was signed by the governor;.
- Attended the Austin Pride parade with constituents; and
- Attended the “People’s Hearing” on SB 8 and HB 7.

Additionally, I supervised and coordinated my Capitol office staff in the following tasks:

- Daily greeting of constituents visiting the office, answering constituent calls and emails, checking after-hours voicemail messages, and receiving the mail;
- Daily posting of social media messages;
- Daily monitoring of my House and district email accounts;
- Preparation of materials for hearing of the House Committee on Judiciary & Criminal Justice;
- Analysis of office budget in light of fines and the upcoming end of the fiscal year and preparation of summary document submitted to me;
- Communication with Senate office regarding a possible amendment to redistricting bill that would maintain the integrity of Del Valle Independent School District;
- Coordination with other Democratic offices any possible amendments to be proposed for being heard on the House floor;
- Writing of my remarks to be delivered at Robert Rives Gymnasium at the Texas School for the Deaf;
- Assisting constituents with issues including overdue child support payments and concerns for physical safety, truck registration, tree branches over power lines;
- Compilation of floor packet for House floor proceedings to commence, including the special session call, vote recommendations, and maps of the proposed congressional redistricting plan;
- Submitting to Texas Legislative Council draft request for a bill intended to prohibit law enforcement officers from wearing a facial covering or personal disguise while interacting with the public in the performance of their duties;
- Submitting to Texas Legislative Council draft request for a concurrent

resolution urging Congress to pass legislation requiring federal agents who are conducting arrests to wear proper uniforms and present identification and prohibiting agents from wearing facial coverings during public-facing enforcement actions;

- Submitting to Legislative Council draft request for a simple resolution commemorating the 40th anniversary of CapMetro;
- Filing HR 62, congratulating El Mercado restaurant in Austin on its 40th anniversary;
- Compiling spreadsheet detailing how precincts in HD 51 would be affected by the new congressional redistricting map;
- Ordering maps detailing changes to the Congressional representation of HD 51 communities from Texas Legislative Council;
- Attendance at NAMI Texas' 89th Legislative Session Mental Health Recap;
- Composing talking points for dedication ceremony in HD 51;
- Attending Del Valle Day, an annual event in HD 51;
- Coordination with Legislative Council IT Support to fix an ongoing issue in our CMS system;
- Coordinating drafts of flood response bills with flood mitigation expert and state drafting attorneys;
- Preparing for floor debate on redistricting bill (second called session);
- Writing, obtaining approval and posting social media informing constituents about long-term flood relief in Travis County;
- Writing, obtaining approval and posting social media informing constituents about a new app the City of Austin launched to help homeless individuals find resources;
- Sharing a video on social media that informs constituents how redistricting will impact my specific district;

- Writing, obtaining approval and posting social media informing constituents about deadlines for flood debris pickup in Travis County; and
 - Writing, obtaining approval and posting social media informing constituents about an upcoming protest against HB 7 and SB 8.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ Lulu Flores
Lulu Flores

RECORD

TAB 10

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF MIHAELA PLESA

Under penalty of perjury, I declare as follows:

1. My name is Mihaela Plesa. I am the Texas State Representative for District 70. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E2.210, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Daily communications and participation in meetings with staff regarding constituent work and operations; daily discussions with stakeholders and colleagues regarding the impact of redistricting

legislation. Examples of such activities include, but are not limited to:

- Daily calls with senior staff regarding constituent calls, voicemails, email correspondence, and casework logged into the state's constituent management system, reviewing input from constituents on issues such as redistricting, abortion pills, cannabis, public transportation, election restrictions and property tax exemptions for disabled veterans and standardized testing in public schools;
- Hosted a Virtual Town Hall on August 11 with approximately 160 constituents in attendance to provide legislative recaps and updates, discuss the redistricting bill and decision to break quorum, and hear feedback from the district. Participated in a question and answer style forum;
- Directed and participated in discussions with stakeholders including disability rights advocates, local nonprofits, and state agency staff regarding community and policy issues;
- Directed staff onboarding and personnel management, including intern training and the distribution of assignments;
- Managed district staff engagement and volunteer activities for community events such as: Chamber of Commerce meetings, Backpack Bash at Northwood Hills Elementary, Collin County Homelessness Coalition, job fair hosted by a congressional office, small business roundtable and Minnie's Food Pantry Back to School Drive-Thru Giveaway;
- Received after action reports, and discussed district events during staff check-ins; and
- Alongside my District Director, I engaged directly in a call with the legislative liaison of the City of Plano as a means to gain perspective on the city's views on recent and relevant state mandates carried out in the 89th legislative session.
- Oversaw staff activities, including monitoring House and Senate

committee meetings, analyzing proposed legislation, discussing proposed legislation with constituents and stakeholders, and other State business. Examples of such activities include, but are not limited to:

- Directed legislative drafting requests regarding vexatious litigants and oversaw the filing of House Bill 303, relating to force majeure during the administration of elections;
- Respectfully referred out of district email correspondence to my colleagues so that their constituents may be heard and their constituents input may be taken into consideration by their respective representative;
- Directed Capitol staff to file an official report with the Texas Department of Public Safety regarding a threatening voicemail left to my Capitol office and to coordinate with law enforcement on safety procedures;
- Reviewed newsletter draft and legislative summaries, ensuring consistent legislative updates are distributed throughout House District 70;
- Worked with staff to draft, finalize and update letters to be mailed or distributed in response to constituent mail;
- Directed staff to maintain social media outreach and distribute updates on legislative developments through online platforms;
- Personally drafted, edited, created graphics, and published legislative and community updates on online platforms, in addition to drafting official statements to inform constituents in a timely manner;
- Conducted keynote virtual address for the CWA Texas State Employees Union, focused on fostering statewide unity among TSEU members and promoting their sustained commitment to activism;

- Oversaw and approved resolutions celebrating the accomplishments of interns engaging with The Source of Hope (TSOH) nonprofit;
- Oversaw staff activities including the collection of applications and relevant documents for students interested in receiving the Texas Armed Services Scholarship Program (TASSP);
- Approved and directed work on constituent correspondence and legislative documents, including certificate and resolution requests;
- Participated in scheduled caucus member meetings to coordinate policy priorities with my colleagues in the House;
- Directed my office to virtually attend a Dallas Council Member's Dallas District 12 Budget town hall, in which they took notes on the expected fiscal changes for Dallas residents in the next year;
- Published my response statement to the Republican members of the Collin County Legislative Delegation expressing my concern for their support of HB 4 over all other legislative priorities in the Governor's call, referencing incoming correspondence my office received from their constituents; and
- Met with former President Obama, Kentucky Governor Andy Beshear, Illinois and Indiana legislators regarding Texas redistricting efforts.

4. After returning to Texas, I performed the following duties of my office:

- Reviewed constituent correspondence and voted NAY on HB 4, consistent with the majority of my constituent's input against redistricting;
- Engaged with other members of the Texas House and advocated for the inclusion of resources for people with disabilities in statewide

disaster planning;

- Analyzed legislation set on the Daily House Calendar;
- Reviewed and approved constituent correspondence and outgoing mail;
- Continued editing the district newsletter;
- Approved and coordinated with staff to submit paperwork onboarding district interns;
- Reviewed the applications my office received for the Texas Armed Services Scholarship Program;
- Oversaw staff meetings on policy discussions with key stakeholders such as the Texas State School Safety Center;
- Consistently was present on the House Floor voting my district;
- Reviewed proposed and referred legislation in the House Committee on Elections;
- Questioned witness providing testimony on HB 18, relating to the making to or acceptance of political contributions by, and the making of political expenditures by, a member of the legislature during certain absences from the state; authorizing a civil penalty;
- During the duration of the month of August (August 1-25th), the district office and capitol offices logged approximately 660 emails, 100 phone calls, and 10 walk-in visits. In which I have read and acknowledged the input and/or feedback of constituent correspondence;
- Planned and coordinated with staff and community leaders to host a Labor Day Picnic in my district;
- Discussed and drafted amendments, seeking input from: school district board member, district Mayor, advocates of cities in my district, other Members and staff; and

- Amended House Bill 48, directing the work group on statewide notifications and alerts to include disability-specific concerns into the state's new disaster preparedness efforts.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
 6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ *Mihaela Plesa*
Mihaela Plesa

RECORD

TAB 11

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF RON REYNOLDS

Under penalty of perjury, I declare as follows:

1. My name is Ron Reynolds. I am the Texas State Representative for District 27. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room 4N.7, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - I had daily communications with my constituents; daily meetings with staff via telephone regarding constituent work; daily discussions with stakeholders, staff, and colleagues regarding the impact of redistricting legislation and strategy for opposing it.

- I worked with my Capitol staff on our weekly legislative newsletter. I also had numerous meetings with my District Director regarding pending resolutions for community events in the district.
 - I directly oversaw staff activities including monitoring House floor activity and committee meetings, analyzing proposed legislation, assisting constituents, responding to numerous media requests to inform the public about redistricting that would impact my constituents in CD 9.
 - I met with Illinois legislators regarding Texas redistricting efforts.
4. After returning to Texas, I performed the following duties of my office:
- I prepared for the debate on House Bill 1 and voted on same. I also prepared for the floor debate.
 - I filed an amendment on the flooding bills and signed on as a co-author on numerous flooding bills.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ Ron Reynolds
Ron Reynolds

RECORD

TAB 12

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF SULEMAN LALANI

Under penalty of perjury, I declare as follows:

1. My name is Suleman Lalani. I am the Texas State Representative for District 76. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E1.212, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Daily meeting with staff regarding Capitol office update, pending business, district office update, and media requests.

- Discussed with staff upcoming town hall meeting, approved materials, video script, and live-streaming plan; discussed additional media requests; arranged Zoom and podcast interviews; discussed attendance on the House floor.
 - Discussed with staff Redistricting Town Hall, old bill draft relating to senior retirement communities and backup power requirements that had finally been returned by Legislative Council; approved bill draft for filing as HB 286.
 - Discussed with staff HB 174 relating to youth camps.
 - Discussed with staff bills I wanted to file for 89-2, including youth camp bill from 89-1, hookah, and senior retirement community bill.
4. After returning to Texas, I performed the following duties of my office:
- Went to House floor to meet with Rep. Collier; met with district staff and community members at the Sugar Land district office, where a large group of community members waited to welcome me back home. Met with community members; met with staff to discuss constituent matters, community programs, long-term projects, and upcoming events before returning to Austin.
 - Daily meeting with staff regarding Capitol and district office updates.
 - Discussed intended House floor speech and reviewed draft. Discussed with staff status of hearing request for HB 123.
 - After Chair King added HB 123 to hearing schedule, discussed hearing materials with staff.
 - Discussed with staff the status of a child missing in the district, need to relay to constituents and the community how to be helpful to law enforcement; stayed in contact with the family and community; communicate with Sugar Land police chief and mayor; discussed whether assistance from state agencies was needed.

5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ Suleman Lalani
Suleman Lalani

RECORD

TAB 13

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF VIKKI GOODWIN

Under penalty of perjury, I declare as follows:

1. My name is Vikki Goodwin. I am the Texas State Representative for District 47. My date of birth is xx/xx/xxxx. My work address is Texas Capitol, Room E2.318, P.O. Box 12910, Austin, Texas 78711-2910. I am over 18 years of age, of sound mind, I have never been convicted of a felony or crime of dishonesty, and I am otherwise capable of making a Declaration.
2. During legislative sessions, most of a legislator's time (including mine) is not spent on the House floor, debating and voting on legislation, but rather on communicating with constituents and stakeholders about pending or desired legislation, drafting and filing legislation, and working with staff and colleagues on strategy for passing desired legislation and defeating undesired legislation.
3. I was temporarily outside Texas during August 2025. While away from Texas, I performed the following duties of my office:
 - Conducted town hall meeting with constituents and public; reviewed proposed congressional redistricting maps; reviewed proposed legislation regarding flood mitigation and recovery.

- Daily communications with constituents; daily meetings with staff regarding constituent work, including assisting with driver license issues, neighborhood nuisances, Texas Workforce Commission wage claims, flag and certificate requests for student.
 - Oversaw staff activities including monitoring House floor activity and committee meetings, analyzing proposed legislation, assisting constituents, responding to media requests to inform public about redistricting effort.
4. After returning to Texas, I performed the following duties of my office:
- Prepared for and engaged in debate and voting on the House floor on redistricting bill and flooding bills.
 - Participated in Zoom meeting on gun violence prevention.
 - Spoke with Sumners Foundation students about the Texas Legislature.
 - Attended a Town Hall with Central Texas Water Coalition for an update on water concerns.
 - Met with staff to review upcoming events, floor activities, constituents concerns and meetings.
5. I was compelled by my oath to resist the redistricting legislation that I believe is illegal, unconstitutional, and harmful to my constituents and the State of Texas.
6. By temporarily leaving Texas, I had no intention of abandoning or forfeiting my office. My intent was to carry out my oath and duty as a member of the Texas House of Representatives and the will of the voters who elected me, for the good of my district.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2025.

/s/ Vikki Goodwin
Vikki Goodwin

RECORD

TAB 14



Post



Janis Holt ✓

@JanisHolt59



I am extremely disappointed that the motion to censure the democrats that fled the state has failed. I voted to censure! 27 of my GOP colleagues chose to not hold them accountable in this way. The vote was 44 to 27. It needed 47 votes to pass, which is a 2/3rds vote. [#txlege](#)

Motion 2 - Censure

Mr. Chairman,

Pursuant to Rule 7.01 of the By-Laws, I move that the House Republican Caucus (the "Caucus") support the censure of those members of the House who were absent without leave during either the first or second called session with the purpose of impeding the action of the house in violation of Rule 5, Section 3, and to impose the following penalties on such members if censure with penalties is allowed under the House Rules:

1. Loss of chairmanships and vice-chairmanships.
2. Loss of credit for seniority for the 89th Session.
3. Pro rata reduction in office budgets for each day the member was absent without leave.

Aye Janis Holt

11:39 AM · Aug 25, 2025 · **75.5K** Views

903

2.1K

5.2K

40

0061



RECORD

TAB 15



The Texas House Republican Caucus convened today and voted to support increased penalties for those who break quorum. The Caucus strongly believes these derelict legislators need to be held accountable for their actions and to the people of Texas. After motions were presented, the Caucus voted to recommend a series of measures.

First, the Caucus supports the following changes to the House Rules during this special session to ensure stronger penalties are immediately in place to prevent any future quorum:

- I. Expressly state in Rule 5, Section 3(d) that loss of chairmanship/vice-chairmanship, loss of seniority, and other penalties under Section 10, Article III, Texas Constitution, may be levied against members who are absent without leave for the purpose of impeding the action of the house.
- II. Increase the fine for breaking quorum from \$500 per day to three times the current legislative per diem per day.
- III. Quorum breakers forfeit the pro rata portion of their monthly budget for each calendar day absent.
- IV. Quorum breakers who are absent at least two or more consecutive days vacate their chairmanships and vice-chairmanships.
- V. Quorum breakers who are absent at least three or more consecutive days lose two years of seniority for each calendar day they are absent thereafter.

Second, the Caucus supports the following additional changes to the House Rules:

- I. Repeal the portion of Rule 4, Section 4A, requiring vice chairs of standing committees to be members of the minority party.
- II. Repeal Rule 4, Section 6A, requiring chairs to consult with vice chairs on scheduling committee business.

Finally, the Caucus supports the following legislation filed during this special session to punish and prevent quorum breaking:

- I. HB 18 by Shaheen – Prohibiting quorum breakers from accepting political contributions during a quorum break.
- II. SB 48 by Middleton/HB 64 by Cain – Providing a member of the legislature vacates the member's office if the member is absent seven consecutive days without leave.
- III. HJR 10 by Hayes - Reducing the quorum of the House and Senate from two-thirds to a majority.

Texans expect their legislators to show up to work. These rules changes and bills help provide more robust penalties to hold quorum breakers accountable and prevent future quorum breaks that disrupt the people's business. The Caucus will bring forth the resolutions with these rules changes before the end of this special session to the House floor for further consideration.

RECORD

TAB 16



Post

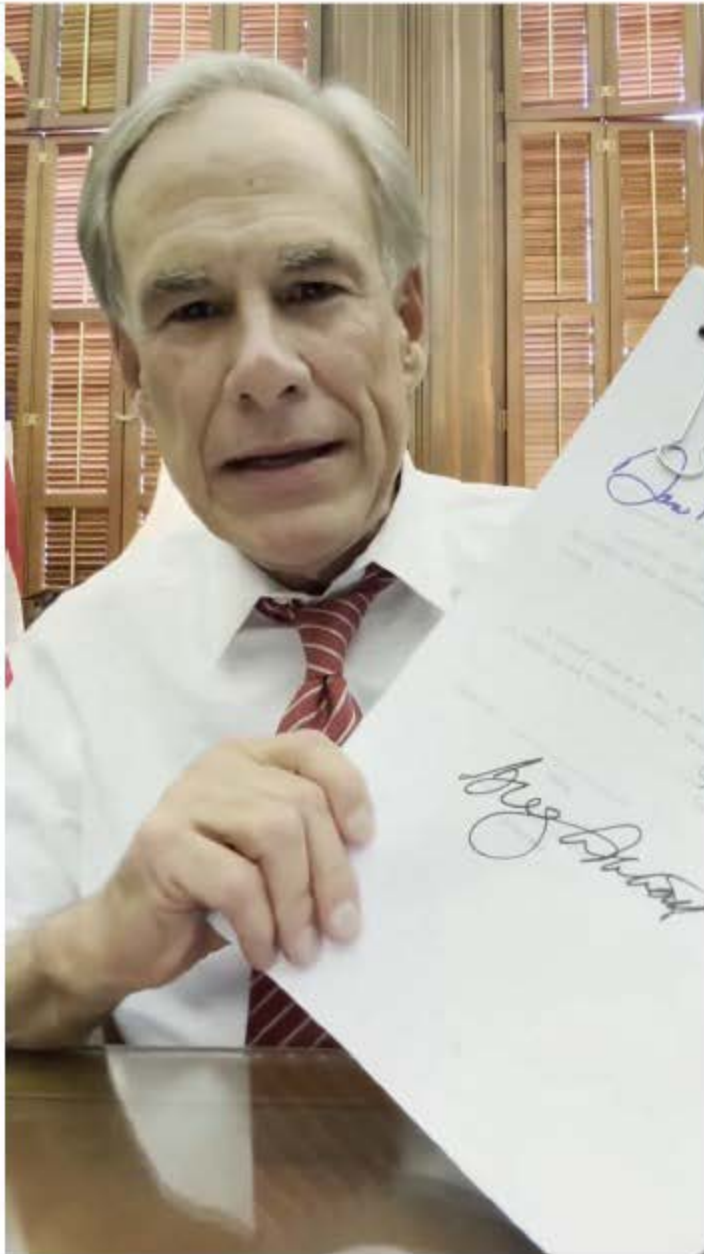
Greg Abbott ✓
@GregAbbott_TX



Today, I signed the One Big Beautiful Map into law.

This map ensures fairer representation in Congress.

Texas will be more RED in Congress.



0:02

The One Big Beautiful Map is Now Law

10:51 AM · Aug 29, 2025 · **25.2K** Views

IN THE SUPREME COURT OF TEXAS

IN RE STATE OF TEXAS

Relator.

IN RE GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS

Relator.

DECLARATION OF AMY WARR

Amy Warr, declares, under oath, as follows:

1. My name is Amy Warr. I am an attorney with the law firm of Alexander Dubose & Jefferson LLP, which represents Respondents. I am over the age of twenty-one (21), competent to testify, have personal knowledge of the facts stated herein based on my involvement as counsel in this case, and affirm that the following statements are true and correct. I make this declaration on behalf of Respondents' Consolidated Brief on the Merits.

2. The Response to the Consolidated Brief on the Merits is accompanied by a separate Record.

3. To comply with the requirements of Texas Rules of Appellate Procedure 52.3(k) and 52.7(a), I attest that the documents contained in the Record are true and correct copies of documents material to the claims for relief.

4. I submit this Declaration under penalty of perjury in lieu of an affidavit as authorized by Texas Civil Practice & Remedies Code § 132.001. My date of birth is xx/xx/xxxx, and my current address is 100 Congress Avenue, Suite 1450, Austin, Texas 78701.

On this 29th day of August, 2025.

/s/ Amy Warr

Amy Warr

Respectfully submitted,

/s/ Chad W. Dunn

Chad W. Dunn
State Bar No. 24036507
chad@brazilanddunn.com
K. Scott Brazil
State Bar No. 02934050
scott@brazilanddunn.com
BRAZIL & DUNN, LLP
1900 Pearl Street
Austin, Texas 78705
Telephone: (512) 717-9822

Amy Warr
Texas Bar No. 00795708
awarr@adjtlaw.com
Alexandra W. Albright
Rebecca A. Gonzalez-Rivas
Anna M. Baker
ALEXANDER DUBOSE & JEFFERSON LLP
100 Congress Avenue, Suite 1450
Austin, Texas 78701-2709
Telephone: (512) 482-9300
Facsimile: (512) 482-9303

Hannah L. Roblyer
Texas Bar No. 24106356
hroblyer@adjtlaw.com
ALEXANDER DUBOSE &
JEFFERSON LLP
1844 Harvard Street
Houston, Texas 77008-4342
Telephone: (713) 523-2358
hroblyer@adjtlaw.com

Kirsten M. Castañeda
Texas Bar No. 00792401
ALEXANDER DUBOSE &
JEFFERSON LLP
8144 Walnut Hill Lane, Suite 1000
Dallas, Texas 75231-4388
Telephone: (214) 369-2358
kcastaneda@adjtlaw.com

Mimi Marziani
State Bar No. 24091906
mmarziani@msgpllc.com
Joaquin Gonzalez
State Bar No. 24109935
jgonzalez@msgpllc.com
Rebecca (Beth) Stevens
State Bar No. 24065381
bstevens@msgpllc.com
MARZIANI, STEVENS & GONZALEZ, PLLC
500 W. 2nd Street, Suite 1900
Austin, Texas 78701
Telephone: (210) 343-5604

Attorneys for Respondents

CERTIFICATE OF SERVICE

I certify that on this 29th day of August, 2025, this Record was served via electronic service through eFile.TXCourts.gov on all parties through their counsel of record, listed below:

Ken Paxton
Brent Webster
William R. Peterson (lead counsel)
William F. Cole
Meagan Corser
Mark A. Csoros
Office of the Attorney General
P.O. Box 12548 (MC 059)
Austin, Texas 78711-2548
William.Peterson@oag.texas.gov
Telephone: (512) 936-1700

*Attorneys for the State of Texas and
Attorney General of Texas*

Trevor W. Ezell
Trevor.Ezell@gov.texas.gov
Joseph P. Behnke
Jason T. Bramow
Caleb Gunnels
OFFICE OF THE GOVERNOR
P.O. Box 12428
Austin, Texas 78711
Telephone: (512) 936-3306

*Attorneys for Greg Abbott, in his official
capacity as Governor of the State of Texas*

/s/ Amy Warr
Amy Warr

Automated Certificate of eService

This automated certificate of service was created by the eFiling system.
The filer served this document via email generated by the eFiling system
on the date and to the persons listed below:

Mandy Patterson on behalf of Amy Warr

Bar No. 795708

mpatterson@adjtlaw.com

Envelope ID: 105050656

Filing Code Description: Brief on the Merits (all briefs)

Filing Description: Respondents' Consolidated Brief on the Merits

Status as of 9/2/2025 8:25 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Scott Brazil		scott@brazilanddunn.com	8/29/2025 7:36:07 PM	SENT
Maria Williamson		maria.williamson@oag.texas.gov	8/29/2025 7:36:07 PM	SENT
Chad Dunn		chad@brazilanddunn.com	8/29/2025 7:36:07 PM	SENT
Wolfgang PHirczy de Mino		wphdmphd@gmail.com	8/29/2025 7:36:07 PM	SENT
William FCole		William.Cole@oag.texas.gov	8/29/2025 7:36:07 PM	SENT
Gene Wu		Gene.Wu@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Gwen Kelly		gwen@brazilanddunn.com	8/29/2025 7:36:07 PM	SENT
Meagan Corser		meagan.corser@oag.texas.gov	8/29/2025 7:36:07 PM	SENT
Amanda Ruch		amanda.ruch@oag.texas.gov	8/29/2025 7:36:07 PM	SENT
William Peterson		william.peterson@oag.texas.gov	8/29/2025 7:36:07 PM	SENT
Ron Reynolds		Ron.Reynolds@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Vikki Goodwin		Vikki.Goodwin@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Gina Hinojosa		Gina.Hinojosa@house.texas.gov	8/29/2025 7:36:07 PM	SENT
James Talarico		James.Talarico@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Lulu Flores		Lulu.Flores@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Mihaela Plesa		Mihaela.Plesa@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Suleman Lalani		Suleman.Lalani@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Chris Turner		Chris.Turner@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Ana-Maria Ramos		Ana-Maria.Ramos@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Jessica Gonzalez		Jessica.Gonzalez@house.texas.gov	8/29/2025 7:36:07 PM	SENT
John Bucy		John.Bucy@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Christina Morales		Christina.Morales@house.texas.gov	8/29/2025 7:36:07 PM	SENT
Amy Warr		awarr@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Mimi Marziani		mmarziani@msgpllc.com	8/29/2025 7:36:07 PM	SENT

Automated Certificate of eService

This automated certificate of service was created by the eFiling system.
The filer served this document via email generated by the eFiling system
on the date and to the persons listed below:

Mandy Patterson on behalf of Amy Warr

Bar No. 795708

mpatterson@adjtlaw.com

Envelope ID: 105050656

Filing Code Description: Brief on the Merits (all briefs)

Filing Description: Respondents' Consolidated Brief on the Merits

Status as of 9/2/2025 8:25 AM CST

Case Contacts

Mimi Marziani		mmarziani@msgpllc.com	8/29/2025 7:36:07 PM	SENT
Joaquin Gonzalez		jgonzalez@msgpllc.com	8/29/2025 7:36:07 PM	SENT
Beth Stevens		bstevens@msgpllc.com	8/29/2025 7:36:07 PM	SENT
Mandy Patterson		mpatterson@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Stacey Jett		sjett@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Kirsten Castaneda	792401	kcastaneda@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Hannah L. Roblyer		hroblyer@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Anna M. Baker		abaker@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Rebecca Gonzalez-Rivas	24145204	bgonzalezrivas@adjtlaw.com	8/29/2025 7:36:07 PM	SENT
Alexandra Albright	21723500	Aalbright@adjtlaw.com	8/29/2025 7:36:07 PM	SENT