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

SHANNON PEREZ, et al., Plaintiffs,  v.  STATE OF TEXAS, et al., Defendants.	<i>\$</i> \$\times\$	CIVIL ACTION NO. 11-CA-360-OLG-JES-XR [Lead Case]
MEXICAN AMERICAN LEGISLATIVE CAUCUS, TEXAS HOUSE OF REPRESENTATIVES, Plaintiffs, v.  STATE OF TEXAS, et al., Defendants.	$\omega$ $\omega$ $\omega$ $\omega$ $\omega$ $\omega$ $\omega$ $\omega$	CIVIL ACTION NO. SA-11-CA-361-OLG-JES-XR [Consolidated Case]
TEXAS LATINO REDISTRICTING TASK FORCE, et al., Plaintiffs, v. RICK PERRY, Defendant.	<i>\$</i> \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	CIVIL ACTION NO. SA-11-CA-490-OLG-JES-XR [Consolidated Case]
MARGARITA V. QUESADA, et al., Plaintiffs, v. RICK PERRY, et al., Defendants.	& & & & & & & & & & & & & & & & & & &	CIVIL ACTION NO. SA-11-CA-592-OLG-JES-XR [Consolidated Case]

EDDIE RODRIGUEZ, et al.,	§	
Plaintiffs,	§	
v.	§	CIVIL ACTION NO.
	§	SA-11-CA-635-OLG-JES-XR
RICK PERRY, et al.,	§	[Consolidated Case]
Defendants.	§	

## MOTION FOR SCHEDULING CONFERENCE

For the following reasons, the Perez plaintiffs, the LULAC plaintiffs, the NAACP plaintiffs, the African-American congressional plaintiffs, the Quesada plaintiffs, and the Rodriguez plaintiffs—"joint plaintiffs"—move the Court to convene a scheduling conference sometime in September 2016, after Labor Day.

- 1. The trial that concluded with closing arguments on August 26, 2014, was on the legality of the state's 2011 redistricting plans for the Texas Congressional seats and the Texas House of Representatives. These matters are under submission.
- 2. Challenges to the legality of the state's 2013 redistricting plans for Congress and the House remain pending.
- 3. Joint plaintiffs are requesting a conference to establish a schedule for the rest of this litigation. The joint plaintiffs will be seeking a scheduling order for this litigation, associated appeals, and possible state legislative remedial actions to conclude before commencement of the 2018 round of elections. Such a scheduling order is necessary to avoid the potential for disruption of the state's 2018 election schedule.

- 4. Filings for positions on the 2018 ballot open in September 2017 for precinct chair and in November 2017 for Congressional and House seats. This leaves only a year after a September 2016 scheduling conference to conclude all remaining aspects of this litigation in advance of the 2018 elections. It is necessary to establish a schedule this coming September in order to achieve that objective.
- 5. The joint plaintiffs have conferred with counsel for parties other than those specifically filing this motion. None opposes the motion. They have indicated as follows:
  - a. The United States, the Mexican American Legislaitve Caucus, the Texas Legislative Redistricting Task Force, and the Texas Democratic Party do not oppose the motion; and
  - b. The State defendants and Congressman Cuellar take no position on the motion.

WHEREFORE, plaintiffs pray that this Court grant this motion and set a scheduling conference in September, 2016.

Respectfully submitted,

\_\_/s/ Luis R. Vera, Jr.\_\_\_ LUIS ROBERTO VERA IR

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of July, 2016, I filed a copy of the foregoing for service on counsel of record in this proceeding through the Court's CM/ECF system.

/s/ Renea Hicks	
Renea Hicks	