

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

SHANNON PEREZ, HAROLD)
DUTTON, JR. AND GREGORY TAMEZ,)
)
Plaintiffs,)

and)

TEXAS LEGISLATIVE BLACK CAUCUS,)
TEXAS HOUSE OF REPRESENTATIVES)

Proposed Plaintiff-Intervenor,)

v.)

CIVIL NO. SA-11-CV-360-
OLG-JES-XR

STATE OF TEXAS, ET AL.,)

Defendants.)

MEXICAN AMERICAN LEGISLATIVE)
CAUCUS,)

v.)

CIVIL NO. SA-11-CV-361-
OLG-JES-XR

STATE OF TEXAS, ET AL.)

TEXAS LATINO REDISTRICTING TASK)
FORCE)

v.)

CIVIL No. SA-11-CV-490-
OLG-JES-XR

RICK PERRY)

**TEXAS LEGISLATIVE BLACK CAUCUS PLAINTIFF-INTERVENOR'S
MOTION TO INTERVENE**

1. Plaintiff is an organization comprising Latino and non-Latino members of the Texas House of Representatives. The case challenges the redistricting of United State House of

Representatives, State House of Representatives, and State Board of Education of Texas. Plaintiff MALC also challenges the at-large election of the members of the Texas Railroad Commission.

2. The Texas Legislative Black Caucus (hereinafter TLBC Intervenors) is comprised of elected officials from different areas of the State who collectively represent the interests of African-Americans and protected groups who are in coalition with them. TLBC and many of their constituents desire their intervention in order to protect the interests of the voters in those districts and the members of the TLBC. TLBC seeks intervention to protect their interests and that of all African-American voters in Texas, and to ensure that the Texas redistricting process is fair and consistent with the Constitutional and statutory protections applying to African-American voters of Texas.

3. The TLBC request for intervention meets all the prerequisites for intervention as a matter of right: the request for intervention is timely; the rights at stake are directly implicated by claims of the Plaintiffs; and, unless it is part of this action the TLBC cannot effectively protect the interests of its members, many of their constituents and to ensure a fair and unbiased redistricting process and outcome for African-American voters of Texas.

FACTUAL BACKGROUND

A. The TLBC

4. The TLBC has 17 members of both political parties. It was originally formed so that African-Americans could have a more effective voice in the legislative process and Texas politics. Throughout its extensive history TLBC and many of its members have participated in successful redistricting litigation.

5. The TLBC represents segments of the African-American community from the entire State of Texas which are not currently represented and should be considered by the Court for a

complete and necessary understanding of the effects of the redistricting plan passed by the Texas Legislature.

6. Defendant is the State of Texas. The State of Texas is a political subdivision covered under the provisions of the Voting Rights Act, 42 U.S.C. §§ 1973–1973aa-6, and responsible for the actions of its officials with regard to state-wide redistricting.

7. Defendant, Rick Perry is the duly elected and acting Governor of the State of Texas. Under Article IV, Section 1, of the Texas Constitution, he is the chief executive officer of the Defendant State of Texas. He is sued in his official capacity.

8. Defendant, David Dewhurst is the duly elected and acting Lieutenant Governor of Texas. Under Article IV, Section 16, of the Texas Constitution, he is the President of the Texas Senate. He is sued in his official capacity.

9. Defendant, Joe Straus is the duly elected and acting Speaker of the Texas House of Representatives and is the presiding officer over the Texas House of Representatives. He is sued in his official capacity.

10. Defendant, Hope Andrade is the duly appointed and acting Texas Secretary of State and She is sued in her official capacity.

B. Procedural Posture

11. Plaintiffs Shannon Perez, Harold Dutton, Jr., and Gregory Tamez filed their action on May 9, 2011. Plaintiff Mexican American Legislative Caucus filed their action on May 9, 2011. Plaintiffs Texas Latino Redistricting Task Force, et al., filed their action on June 17, 2011. On July 6, 2011, District Court Judge Orlando L. Garcia ordered that the three cases be consolidated under the lead case, *Perez, et al., v. State of Texas, et al.*, Civil Action No. SA-11-CA-360-OLG-JES-XR. No significant discovery has occurred, and no substantive hearings have been held.

C. Potential Impact of this Litigation

12. Historically, courts have regularly found that redistricting plans in Texas have discriminated against African-American voters. *See, e.g., White v. Register*, 412 U.S. 755, 766-67 (1973) (affirming findings by the district court that African-American voters in Dallas County had been “effectively excluded from participation in the Democratic primary selection process”) (quoting *Graves v. Barnes*, 343 F.Supp. 704, 726 (W.D.Tex. 1972)); *Rollins v. Fort Bend Indep. Sch. Dist.*, 89 F.3d 1205, 1214 (5th Cir. 1996) (“The parties cannot and do not dispute that FBISD’s history is blemished by past racial discrimination.”); *LULAC v. N. E. Indep. Sch. Dist.*, 903 F. Supp. 1071 (W.D. Tex. 1995). African-Americans have lost representation in Congress in the past, in part due to the ineffectiveness of the redistricting process, and it is clear that the current opportunity seats are the result of litigation and efforts to enforce the Voting Rights Act.

13. Texas’ African-American population does not receive an effective voice in the manner that the proposed redistricting plan has been drawn, with CDs 30, 18 and 9 being unnecessarily dissected and drawn without proper regard to existing communities of interest. The economics of the districts have changed greatly under the proposed plan and further it is important that African-Americans have created another seat where the African-American voices may be heard in Texas Congressional districts. The Texas House plan does not provide for fair representation of African-Americans. District 146 does not provide for joins conflicting communities not of interest, is drawn such that it may lose its character as an African-American opportunity district and it is drawn in a manner to show fragmenting and packing. In fact, the plan as a whole undermines the future ability of African-Americans to elect their preferred candidate of choice and is designed to divide effect African-American and Latino coalitions that have been and continue to be effective.

14. In addition, TLBC Plan H202 created additional minority opportunity districts under Section 2. One was located in Northeast Dallas County and the other in Bell County. Further, the State Plan dilutes the Asian population in HD26 whereas the plan of TLBC (H202) provided for an additional minority opportunity seat in HD26. Overall, TLBC believes the plan adopted is clearly retrogressive and is in stark contrast to less retrogressive plans that it tendered in the redistricting process. The same is true for the Texas Senate seats, where there only 2 of 31 African-American opportunity seats currently contrasted to 12 percent of the population. Even creating just a third seat will result in underrepresentation, but it will more closely approximate what was intended by the Voting Rights Act. And if the configuration of the Harris County Senate seat changes in this process, African-American and protected voters acting in concert with them will have even greater voices. Travis County has such a configuration of individuals to where a Congressional seat that is a Hispanic opportunity seat and anchored in this city may be created. If permitted to intervene, TLBC will demonstrate that current redistricting plans passed by the Texas Legislature will dilute and diminish the impact of African-American voters on election outcomes.

ARGUMENT

I. Intervention Is Proper as a Matter of Right.

TLBC files this Motion to Intervene and request intervention as a matter of right under Federal Rules of Civil Procedure 24(a). Intervention as of right should be granted when the following four requirements are met:

(1) the motion to intervene is timely; (2) the potential intervener asserts an interest that is related to the property or transaction that forms the basis of the controversy in the case into which she seeks to intervene; (3) the disposition of that case may impair or impede the potential intervener's ability to protect her interest; and (4) the existing parties do not adequately represent the potential intervenor's interest.

Doe #1 v. Glickman, 256 F.3d 371, 375 (5th Cir. 2001) (citations omitted). Intervention should be liberally granted as “[f]ederal courts should allow intervention where no one would be hurt and the greater justice could be attained.” *Id.* at 375 (quoting *Sierra Club v. Espy*, 18 F.3d 1202, 1205 (5th Cir. 1994)). Thus, “intervention of right must be measured by a practical rather than technical yardstick.” *Edwards v. City of Houston*, 78 F.3d 983, 999 (5th Cir. 1996).

A. The Intervention is Timely.

TLBC's intervention is timely because it acted swiftly and with all practicable speed upon learning that Plaintiffs had filed the present action. Up to this point, no significant discovery has occurred and no substantive hearings have been held.

Timeliness is a flexible requirement that differs from case to case. *See McDonald v. E.J. Lavino Co.*, 430 F.2d 1065, 1074 (5th Cir. 1970). In addition, the Fifth Circuit has outlined the four factors that address the timeliness of a motion to intervene:

(1) how long the potential intervener knew or reasonably should have known of her stake in the case into which she seeks to intervene; (2) the prejudice, if any, the existing parties may suffer because the potential intervener failed to intervene when she knew or reasonably should have known of her stake in that case; (3) the prejudice, if any, the potential intervener may suffer if the court does not let her intervene; and (4) any unusual circumstances that weigh in favor of or against a finding of timeliness.

Doe #1, 256 F.3d at 376. As this motion to intervene has been filed only 11 days after the amended scheduling order, it is clear that Texas-NAACP and Individual Intervenors meet the timeliness requirement.

1. TLBC Prepared and Filed its Intervention Motion Well Before Any Substantive Consideration by the Court or Significant Discovery has been Undertaken.

Upon receiving notice of the action, TLBC initiated steps to review the pleadings, confer with its attorneys and go through its national procedural structure to gain authorization to intervene. Under these facts and the facts of the case, TLBC's motion to intervene is timely.

2. Intervention Will Not Prejudice the Plaintiffs.

Plaintiffs will not suffer any prejudice as a result of TLBC's request for intervention. The lawsuits have only been recently filed. No significant discovery has been completed and no substantive hearings have been held. The case remains near its inception. Attorneys for Plaintiffs MALC and Perez have authorized proposed Plaintiff-Intervenors to inform the court that they do not oppose this intervention.

3. TLBC Will Suffer Significant Prejudice if Intervention is Denied.

TLBC and its members will suffer substantial and significant harm if intervention is not granted. The allegations in Plaintiff-Intervenor's complaint directly implicate the rights of African-American voters. If the present redistricting plan put forth by the Texas Legislature is implemented, the voting power of African-Americans in Texas could be significantly diluted. The impact of the redistricting plan is vast as it encompasses the election of members of the Texas Legislature, the Members of Congress, and the Members of the Texas Railroad Commission. Although TLBC affirms the good faith of Plaintiffs who are colleagues of their own, TLBC represents different individuals largely with frequently different interests. TLBC Members effectively represent their constituents and their ability to have effective voices may be eliminated by this new plan. Unless intervention is granted, Plaintiff-Intervenors will be significantly limited in their ability and opportunity to ensure that the redistricting process and its results addresses the needs and rights of African-American voters.

4. No Unusual Circumstances Exist that Would Militate Against Intervention.

TLBC is unaware of any circumstances that would operate against its intervention.

B. The Plaintiff-Intervenor Has Substantial and Legally Protected Interests in the Case That It Cannot Protect Without Intervention and Is Inadequately Protected by the Named Plaintiffs.

TLBC Intervenor is an organization are African-American legislators and voters who have a significant and legally protected interest that are implicated in the present action. The

Voting Rights Act was passed primarily to prohibit discrimination against African-Americans in voting. 42 U.S.C. §§ 1973 *et seq.* Courts have historically and continue to recognize that redistricting schemes have been drawn so as to inhibit and dilute the voting strength of African Americans. *See White v. Register*, 412 U.S. 755 (1973). The history of litigation surrounding redistricting plans in Texas have shown that the State of Texas has violated Section 2 of the Federal Voting Rights Act and the Fourteenth Amendment to the US Constitution. *See e.g., White v. Register*, 412 U.S. 755 (1973). Until the adoption of the Voting Rights Act and ensuring redistricting and litigation resulting from it,

TLBC can only effectively protect these rights if granted intervention. Intervention is the only mechanism in this instance that will allow TLBC to effectively represent the interests of its members, their African-American constituents, and other people of color.

II. Alternatively, TLBC Should Be Allowed to Permissively Intervene.

Alternatively, the Plaintiff-Intervenor should be allowed to intervene permissively pursuant to Fed. R. Civ. P. 24(b). Permissive intervention is a matter of discretion for the Court, and is appropriate when the intervention is timely, the intervenor's "claim or defense and the main action have a question of law or fact in common" and granting the intervention will not unduly delay or prejudice the original parties in the case. Fed. R. Civ. P. 24(b)(2). As previously discussed, the TLBC Intervenor's motion for intervention is timely. There are common questions of law and fact between the claims of Plaintiffs and TLBC. These include whether the redistricting plan passed by the Texas Legislature violates Section 2 of the Voting Rights Act. Thus, as an alternative ground, allowing Plaintiff-Intervenor to intervene permissively is appropriate.

PRAYER

Based upon the foregoing, Plaintiff-Intervenor requests the court grant their motion as of right or permissively, and order the district court to file the attached complaint as a matter of record in this case and such other further relief as the court determines justice and equity so require.

Respectfully Submitted,

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Lead Attorney for Plaintiff-Intervenor
(temporarily unavailable due to travel overseas, but will file pro hac vice)

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July, 2011 a true and correct copy of Plaintiff-Intervenor's Motion to Intervene was delivered to Plaintiffs and Defendants via the United States District Court, Western Division of Texas, San Antonio Division, ECF system.

/s/ Gary L. Bledsoe
Gary L. Bledsoe

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OLG-JES-XR

RICK PERRY)

ORDER

On _____, the Court Considered the Plaintiff-Intervenor’s Motion to Intervene and the memorandum and arguments of counsel therein. After due consideration, the Court find the motion should be granted and Plaintiff-Intervenor should be allowed to participate

fully in this litigation. The court hereby orders the U.S. district clerk to file the attached complaint as a matter of record in this case.

Signed on: _____

Presiding Judge

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RICK PERRY)

**ORIGINAL COMPLAINT OF PLAINTIFF-INTERVENOR TEXAS LEGISLATIVE
BLACK CAUCUS**

1. This is an action to enforce Plaintiff-Intervenor’s rights under the Fourteenth Amendment to the United States Constitution and under Section 2 of the Voting Rights Act, 42 U.S.C. § 1973

et seq. Plaintiff-Intervenor, the Texas Legislative Black Caucus (hereinafter TLBC) is comprised of elected officials from different areas of the State who collectively represent the interests of African-Americans and protected groups who are in coalition with them. Plaintiff-Intervenor brings this action requesting declaratory and injunctive relief against the State of Texas to prevent the implementation of redistricting plans for the Texas Congressional districts, Texas State House districts, and Texas State Senate districts. Each of these redistricting plans dilute the voting strength of African-American voters because in the totality of circumstances, African-American voters do not have an equal opportunity to elect candidates of their choice to the United States Congress, the Texas House of Representatives and the Texas State Senate. Each of these redistricting plans dilute the voting strength of African-American voters because in the totality of circumstances, African-American voters do not have an equal opportunity to elect candidates of their choice to Congress. If allowed to be implemented, these plans will undervalue the vote of Texas' African-American citizens and deny them fair representation in these governing bodies. If implemented, these plans will dilute the voting strength of Texas' African American citizens and deny them fair representation in these governing bodies. Plaintiff-Intervenor seeks the implementation of Congressional, State House, and State Senate redistricting plans that will not dilute the voting strength of African-American voters in Texas. Plaintiff-Intervenor also seeks costs and attorneys' fees.

I. JURISDICTION

2. Plaintiff-Intervenor's complaint arises under the United States Constitution and federal statutes. This Court has jurisdiction over this action under 28 U.S.C. § § 1331, 1343(a)(3) and (4), and 1988.
3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b).

4. Plaintiff-Intervenor seeks declaratory and injunctive relief pursuant to 28 U.S.C. § 2201 and 2202.

5. Plaintiff-Intervenor requests the convening of a three-judge court pursuant to 28 U.S.C. § 2284.

II. PARTIES

6. Plaintiff, the **TEXAS LEGISLATIVE BLACK CAUCUS**, has 17 members of both political parties. It was originally formed so that African-Americans could have a more effective voice in the legislative process and Texas politics. Throughout its extensive history, TLBC and many of its members have participated in successful redistricting litigation. TLBC represents segments of the African-American community from the entire State of Texas which are not currently represented and should be considered by the Court for a complete and necessary understanding of the effects of the redistricting plan passed by the Texas Legislature.

7. Defendant is the State of Texas. The State of Texas is a political subdivision covered under the provisions of the Voting Rights Act and responsible for the actions of its officials with regard to state-wide redistricting.

8. Defendant Rick Perry is the duly elected and acting Governor of the State of Texas. Under Article IV, Section 1, of the Texas Constitution, he is the chief executive officer of the Defendant State of Texas. He is sued in his official capacity.

9. Defendant David Dewhurst is duly elected and acting Lieutenant Governor of Texas. Under Article IV, Section 16, of the Texas Constitution he is the President of the Texas Senate. He is sued in his official capacity.

10. Defendant Joe Strauss is the duly elected and acting Speaker of the Texas House of Representatives and is the presiding officer over the Texas House of Representatives. He is sued in his official capacity.

11. Defendant Hope Andrade is the duly appointed and acting Secretary State of the State of Texas. She is being sued in her official capacity.

III. FACTS

12. Section 2 of the Voting Rights Act of 1965, 42 U.S.C. 1973, applies nationwide and prohibits voting practices and procedures that result in the denial or abridgement of the right of any citizen to vote on account of race, color, or membership in a language minority group. Section 2 is a permanent provision of the federal Voting Rights Act.

13. The total Texas population is 12% African-American according to the 2010 federal census. African-Americans comprise at least this percentage of the state's Citizen Voting Age population. Texas' African-American population is roughly equivalent to the total population of Mississippi, which has four representatives in the United States Congress.

14. After the last decennial census, the Texas Congressional apportionment will increase from 32 representatives to 36 representatives, due to an overall population increase of 20.6% (more than twice the average rate of growth nationally). Approximately 89% of the population growth in Texas this past decade—growth that resulted in our State's right to four additional Congressional representatives—is a result of minority growth. Both Latino growth and African-American growth eclipsed Anglo growth in both percentage and raw numbers—Latino growth represented 65% of the state's population growth, the African-American population grew 22%, and the Anglo population grew just 4.2%. Texas is now a majority-minority state—only 45% of the state's total population is Anglo.

15. Proportionally, African-Americans are underrepresented in the U.S. House of Representatives. Roughly proportional representation would require more than the three African-American opportunity districts that currently exist.

16. The Texas-NAACP submitted a plan for a new African-American opportunity Congressional seat in the Dallas-Fort Worth area to the Legislature, but the request to create this district was denied. Each of these Congresspersons receives many requests for assistance outside of their district because of the few African-American Congresspersons that are within the Texas delegation even though the Texas' African-American population approximates that of Mississippi. They clearly have an interest in Texas gaining another person who will work to advance the political interests of African-Americans statewide, but also in having plans that would permit them to be more effective by not marginalizing African-American voters in their districts or unnecessarily splitting communities of interest.

17. Legislative efforts to draw Texas Congressional map also led to the drawing of Congressional Districts 9, 18 and 30 in such a way as to be unfair and undermine the ability of African-Americans to effectively participate in the political process in those areas and it has similar impact on Latinos in those areas who have acted in coalition with African-Americans to further the interests of both communities.

18. The Congressional plans unnecessarily split communities of interest, deleted important areas from the existing Congressional districts, and are designed to undermine or frustrate effective and long term voter coalitions in the area. The plan is the result in whole or in part of intentional discrimination.

19. The current Congressional redistricting plan does not include a Latino-majority Congressional district in the Fort Worth area.

20. The Latino population in Tarrant County is sufficiently geographically compact to comprise the majority of citizen voting age persons in a congressional district.
21. A Congressional district can be created in the Fort Worth area that will afford Latino voters the opportunity to elect their candidate of choice.
22. Elections in Texas continue to be racially polarized.
23. African-Americans in Texas generally vote as a group and are politically cohesive.
24. Latinos in Texas vote as a group and are politically cohesive.
25. Latinos and African-Americans in Texas vote as a group and are politically cohesive. Latinos and African-Americans in CD 30, CD 9 and CD 18 vote as a group and are politically cohesive in ensuring the continued character of the districts. Latinos and African-Americans in Tarrant and Counties vote as a group and are politically cohesive.
26. Anglos in Texas generally vote as a group, are politically cohesive and vote sufficiently as a block to defeat the preferred candidate of Latino and African-American voters absent fair and equitable majority-minority single member districts. This has been documented by the Federal and State Courts, the US Commission on Civil Rights and by the US Congress.

IV. CAUSES OF ACTION

Count I

27. The allegations contained in paragraphs 1-29 are alleged as if fully set forth herein.
28. The current Congressional, State House and State Senate redistricting plans violate Section 2 of the Voting Rights Act, as amended, 42 U.S. § 1973. These plans result in a denial or abridgement of the right to vote of Plaintiff-Intervenor's members on account of their race, color, or ethnicity, by having the effect of canceling out or minimizing their individual voting strength as minorities in Texas. The state's proposed redistricting plans, passed by the Texas Legislature,

do not afford Plaintiff-Intervenor's members an equal opportunity to participate in the political process and to elect representatives of their choice, and denies Plaintiff-Intervenor's members the right to vote in elections without discrimination of race, color, or previous condition of servitude in violation of 42 U.S.C. § 1973.

Count II

29. The allegations contained in paragraphs 1-32 are alleged as if fully set forth herein.

30. The redistricting plans adopted by the Texas Legislature were developed in such a way and with the intent to disadvantage African-American and other minority voters. This intentional discrimination is in violation of the 14th Amendment of the United States Constitution and 42 U.S.C. § 1983.

Count III

31. The allegations contained in paragraphs 1-32 are alleged as if fully set forth herein.

32. The current plans in place for the Congressional, Texas House and Texas Senate districts exceed permissible population variances between the least populated and the most populated districts. The enforcement of such plans by the Defendants violate the rights of all voters as guaranteed by the one person, one vote principle embodied within the 14th Amendment of the U.S. Constitution, as protected by 42 U.S.C. § 1983.

33. There are no enforceable alternative plans currently in place.

34. The plans adopted by the Texas Legislature for the United States Congress, Texas House and Texas Senate have not yet received the necessary preclearance required by Section 5 of the Voting Rights Act, 42 U.S. C. § 1973c. These plans therefore cannot be implemented unless and until it receives Section 5 preclearance.

35. The plans adopted by the Texas Legislature for the United States Congress, Texas House and Texas Senate violate Section 2 of the Voting Rights Act of 1965, as amended, 42 U.S.C. § 1973, and thus cannot be implemented.

V. BASIS FOR EQUITABLE RELIEF

36. Plaintiff-Intervenor has no plain, adequate or complete remedy at law to redress the wrongs alleged herein and this suit for declaratory judgment and injunctive relief is their only means of securing adequate redress from all of the Defendants' unlawful practices.

37. Plaintiff-Intervenor will continue to suffer irreparable injury from all of the Defendants' intentional acts, policies, and practices set forth herein unless enjoined by this Court.

VI. ATTORNEYS' FEES

38. In accordance with 42 U.S.C. Section 1973-1(e) and 1988, Plaintiff-Intervenor is entitled to recover reasonable attorney's fees, expenses and costs.

VII. PRAYER

39. Plaintiff-Intervenor respectfully prays that this Court enter Judgment granting:

A. A declaratory judgment that State Defendants' actions violate the rights of Plaintiff-Intervenor as protected by Section 2 of the Voting Rights Act, 42 U.S.C. § 1973 et seq., and the Fourteenth Amendment to the United States Constitution, 42 U.S.C. § 1983;

B. Preliminary and permanent injunctive relief requiring State Defendants, their successors in office, agents, employees, attorneys, and those persons acting in concert with them and/or at their discretion – to develop redistricting plans that do not dilute African American and minority voting strength for the Texas House of

Representatives, the Texas Senate, and the United States House of Representatives, and enjoining and forbidding the use of the current congressional and state legislative redistricting plans.

C. If need be, adopt an interim electoral plan for the 2012 elections for United States Congress, Texas House of Representatives, and Texas Senate.

D. An order of this Court retaining jurisdiction over this matter until all Defendants have complied with all orders and mandates of this Court;

E. An order requiring Defendants to pay all costs including reasonable attorneys' fees, and

F. Such other and further relief as the Court may deem just and proper.

Respectfully Submitted,

Law Offices of Gary L. Bledsoe & Associates

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Lead Attorney for Plaintiff-Intervenor
(temporarily unavailable due to travel overseas, but will file pro h

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July, 2011 a true and correct copy of Plaintiff-Intervenor's Complaint was delivered to Plaintiffs and Defendants via the United States District Court, Western Division of Texas, San Antonio Division, ECF system.

/s/ Gary L. Bledsoe

Gary L. Bledsoe