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

LEAGUE OF UNITED LATIN AMERICAN CITIZENS (LULAC), et al., Plaintiffs, v. GREG ABBOTT, et al., Defendants.	Civil Action No. 3:21-cv-259 (DCG-JES-JVB) (consolidated cases)

UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE TO COMPEL TESTIMONY OF SENATORS HUFFMAN AND BETTENCOURT AND MS. CARTER

The United States of America respectfully requests an extension of time for parties to move to compel legislative deposition testimony of Senators Joan Huffman and Paul Bettencourt, and Ms. Sharon Carter, if any, until August 15, 2022. These depositions were conducted on July 28 and 29, 2022. Final transcripts were not available until August 3 and 4, 2022. Pursuant to subpart (d) of the Court's July 28, 2022 Order, the parties have worked "in good faith to agree to an appropriate filing date on a case-by-case basis." Order, ECF No. 490. The parties have conferred, and counsel for Senator Huffman, Senator Bettencourt, and Ms. Carter do not oppose the relief sought. The United States respectfully requests that the Court grant an extension to August 15, 2022 for motions to compel related to these depositions. A proposed order is attached hereto.

DATED: August 7, 2022

Respectfully submitted,

JOHNATHAN SMITH
Acting Principal Deputy Assistant Attorney General
Civil Rights Division

REBECCA B. BOND
Acting Deputy Assistant Attorney General
Civil Rights Division

/s/ Daniel J. Freeman
T. CHRISTIAN HERREN, JR.
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CERTIFICATE OF CONFERRAL

I hereby certify that on August 3 and August 4, 2022, counsel for the United States met and conferred with counsel for Senator Huffman, Senator Bettencourt, and Ms. Carter concerning the subject of this motion. Counsel indicated no opposition to the relief sought.

/s/ Daniel J. Freeman
Daniel J. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2022, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Daniel J. Freeman
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[PROPOSED] ORDER GRANTING EXTENSION TO FILE MOTIONS TO COMPEL HUFFMAN, BETTENCOURT, AND CARTER DEPOSITION TESTIMONY

Upon consideration of the United States' unopposed motion for an extension of time to move to compel deposition testimony of Senator Joan Huffman, Senator Paul Bettencourt, and Ms. Sharon Carter, dated August 7, 2022, the United States' motion is GRANTED. Parties may move to compel legislative deposition testimony of these individuals by no later than August 15, 2022.

So ORDERED and SIGNED this ___ day of _____, 2022.

_____
HON. DAVID G. GUADERRAMA
UNITED STATES DISTRICT JUDGE

And on behalf of:

Jerry E. Smith
United States Circuit Judge
U.S. Court of Appeals, Fifth Circuit

-and-

Jeffrey V. Brown
United States District Judge
Southern District of Texas