

CAUSE NO. D-1-GN-17-003451

LEAGUE OF WOMEN VOTERS OF TEXAS, TEXAS STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP) and RUTHANN GEER,
Plaintiff

IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS

v.

ROLANDO PABLOS, Secretary of State for the State of Texas, and KEITH INGRAM, Director, Texas Elections Division of the Secretary of State,
Defendant.

98TH JUDICIAL DISTRICT

DEFENDANTS' ANSWER AND AFFIRMATIVE DEFENSES

TO THE HONORABLE JUDGE OF THIS COURT.

Defendants, Rolando Pablos, Secretary of State for the State of Texas, and Keith Ingram, Director, Texas Elections Division of the Secretary of State (collectively, "Defendants"), file this Original Answer and Affirmative Defenses in the above numbered and entitled cause, and would respectfully show the Court the following:

GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedures, Defendants deny each and every allegation contained within Plaintiffs' Original Petition for Declaratory Relief and demand strict proof of all allegations, as required by law.

AFFIRMATIVE DEFENSES

1. Defendants assert the defense of sovereign immunity as to all of Plaintiffs' claims.
2. Defendants assert that the redundant remedies doctrine bars Plaintiffs' claims and requests for relief.

3. Defendants assert that this Court lacks jurisdiction over Plaintiffs' claims.
4. Defendants assert that Plaintiffs' claims should be dismissed to the extent they are moot or not ripe for adjudication.
5. Defendants reserve the right to raise additional affirmative defenses as they become apparent during the development of the case.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendants pray that the Court deny all relief that the Plaintiffs request; that Plaintiffs take nothing by way of this suit; that all court costs be taxed against Plaintiffs; and for such other and further relief to which they may be entitled.

Date: August 18, 2017

Respectful v. submitted.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing documents has been served on this the 18th day of August, 2017 on the following:

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