

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.

CIVIL ACTION NO.
SA-11-CA-360-OLG-JES-XR
[Lead Case]

**PLAINTIFFS' MALC, TEXAS REDISTRICTING TASK FORCE ET AL. AND HENRY
CUELLAR ADVISORY IN RESPONSE TO JULY 3, 2018 ORDER (DOC. 1586)**

On July 3, 2018 this Court directed the parties to advise the Court “as to what, if any, other issues remain in this case.” The parties were directed to file the advisory by August 29, 2018.

In addition to the issue identified by this Court concerning an appropriate remedy regarding HD 90, addressed by the Task Force Plaintiffs and the State of Texas, but as yet unresolved, Plaintiffs MALC, Cuellar and Task Force know of two other issues remaining that it seeks to litigate in this cause: 1) the questions of prevailing party and the award of a reasonable attorney’s fee pursuant to 42 U.S.C. § 1988 and 52 U.S.C. § 103010(e), remain and 2) Plaintiffs’ claim seeking that future changes in voting be submitted for preclearance pursuant to § 3(c) of the Voting Rights Act. *See* 52 U.S.C. § 10302(c), (bail-in) is still unresolved.

Since the issues of an appropriate remedy for HD 90 and an appropriate order on bail-in remain pending, the undersigned parties respectfully request that the Court set a deadline for attorney’s fees applications no earlier than 30 days from the date of the Court’s remedial order

on HD 90 and order a briefing schedule on the question of bail-in.

DATED: August 29, 2018

Respectfully submitted,

/s/Jose Garza

JOSE GARZA
Texas Bar No. 07731950
Law Office of Jose Garza
7414 Robin Rest Dr.
San Antonio, Texas 78209
(210) 392-2856
garzpalm@aol.com

Martin Golando
The Law Office of Martin Golando
405 N. St. Mary's, Suite 700
San Antonio, Texas 78209
210-892-8543

ROLANDO L. RIOS
SBN: 16935900
Attorney for Plaintiff-Intervenor
Henry Cuellar
The Law Offices of Rolando L. Rios
110 Broadway, Suite 355
San Antonio, Texas 78205

MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL
FUND

/s/ Nina Perales

Nina Perales
TX Bar No. 24005046
Ernest I. Herrera
TX Bar No. 24094718
Celina Moreno
TX Bar No. 24074754
*Denise Hulett
CA Bar No. 121553
*Kip M. Hustace
CA Bar No. 310048
110 Broadway, Suite 300
San Antonio, TX 78205
(210) 224-5476
FAX (210) 224-5382

Admitted *Pro Hac Vice*
COUNSEL FOR PLAINTIFFS
TEXAS LATINO REDISTRICTING
TASK FORCE, RUDOLFO ORTIZ,
ARMANDO CORTEZ, SOCORRO
RAMOS, GREGORIO BENITO
PALOMINO, FLORINDA
CHAVEZ, CYNTHIA VALADEZ,
CESAR EDUARDO YEVENES,
SERGIO CORONADO, GILBERTO
TORRES, RENATO DE LOS
SANTOS, JOEY CARDENAS,
ALEX JIMENEZ, EMELDA
MENENDEZ, TOMACITA
OLIVARES, JOSE OLIVARES,
ALEJANDRO ORTIZ, AND
REBECCA ORTIZ

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of August, 2018, I electronically filed the foregoing using the CM/ECF system which will send notification of such filing to all counsel of record who have registered with this Court's ECF system.

/s/ Jose Garza
JOSE GARZA