

IN THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

No. 14-41127

MARC VEASEY; *et al.*,

Plaintiffs-Appellees,

v.

GREG ABBOTT, in his Official Capacity as Governor of Texas; *et al.*,

Defendants-Appellants.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS

**THE VEASEY-LULAC APPELLEES'
OPPOSITION TO THE MOTION TO STAY THE MANDATE PENDING
PETITION FOR CERTIORARI**

CHAD W. DUNN
K. SCOTT BRAZIL
BRAZIL & DUNN
4201 Cypress Creek Pkwy.
Houston, Texas 77068
(281) 580-6310

NEIL G. BARON
LAW OFFICE OF NEIL G. BARON
914 FM 517 W, Suite 242
Dickinson, Texas 77539
(281) 534-2748

J. GERALD HEBERT
CAMPAIGN LEGAL CENTER
1411 K Street NW, 14 Floor
Washington, DC 20005
(202) 736-2200

ARMAND G. DERFNER
DERFNER & ALTMAN, LLC
575 KING STREET, SUITE B
CHARLESTON, S.C. 29403
(843) 723-9804

DAVID RICHARDS
RICHARDS, RODRIGUEZ & SKEITH,
LLP
816 Congress Avenue, Suite 1200
Austin, Texas 78701
(512) 476-0005

LUIS ROBERTO VERA, JR.
LULAC NATIONAL GENERAL
COUNSEL
THE LAW OFFICES OF LUIS VERA, JR.,
AND ASSOCIATES
1325 Riverview Towers
111 Soledad
San Antonio, Texas 78205-2260
(210) 225-3300

Counsel for the Veasey-LULAC Appellees

ARGUMENT AND AUTHORITIES

Fully subscribing to the views of the United States and adopting the Response filed by it in full, any other arguments and authorities that would be offered by the *Veasey-LULAC* Appellees in opposition to a stay pending writ of certiorari are fully set forth in their Reply in support of their Motion to Issue the Mandate Forthwith filed with the Court on September 3, 2015.

CONCLUSION

The Motion to Stay the Mandate Pending Petition for Certiorari should be denied.

Respectfully submitted,

/s/ Chad W. Dunn

CHAD W. DUNN
K. SCOTT BRAZIL
BRAZIL & DUNN
4201 Cypress Creek Pkwy., Suite 530
Houston, Texas 77068
(281) 580-6310

J. GERALD HEBERT
CAMPAIGN LEGAL CENTER
1411 K Street NW, 14 Floor
Washington, DC 20005
(202) 736-2200

ARMAND G. DERFNER
DERFNER & ALTMAN
575 King Street, Suite B
Charleston, S.C. 29403

(843) 723-9804

NEIL G. BARON
LAW OFFICE OF NEIL G. BARON
914 FM 517 W, Suite 242
Dickinson, Texas 77539
(281) 534-2748

LUIS ROBERTO VERA, JR.
LULAC National General Counsel
THE LAW OFFICES OF LUIS VERA JR., AND ASSOCIATES
1325 Riverview Towers
111 Soledad
San Antonio, Texas 78205-2260
(210) 225-3300

DAVID RICHARDS
RICHARDS, RODRIGUEZ & SKEITH, LLP
816 Congress Avenue, Suite 1200
Austin, Texas 78701
(512) 476-0005

*Counsel for Marc Veasey, Floyd James Carrier, Anna Burns, Michael Montez,
Penny Pope, Jane Hamilton, Sergio DeLeon, Oscar Ortiz, Koby Ozias, John
Mellor-Crummey, Evelyn Brickner, Gordon Benjamin, Ken Gandy and the League
of United Latin American Citizens*

CERTIFICATE OF COMPLIANCE

The foregoing brief complies with the type-volume limitation of FED. R. APP. P. 32(a)(7)(B) because the brief contains 82 words, excluding the parts of the brief exempted by FED. R. APP. P. 32(a)(7)(B)(iii) and Circuit Rule 32.2.

The foregoing brief complies with FED. R. APP. P. 32(a)(5)'s type-face requirements and FED. R. APP. P. 32(a)(6)'s type style requirements because the brief has been prepared in a proportionally spaced type-face using Microsoft Word 2007 in Baskerville Old Face 14-point font.

/s/ Chad W. Dunn
Chad W. Dunn

CERTIFICATE OF SERVICE

I certify that on September 10, 2015, I electronically filed the foregoing OPPOSITION with the Clerk of the Court for the United States Court of Appeals for the Fifth Circuit by using the appellate CM/ECF system. All participants in this case who are registered CM/ECF users will be served by the appellate CM/ECF system.

I further certify that on September 10, 2015, I served a copy of the foregoing OPPOSITION on the following counsel by certified U.S. mail, postage prepaid:

Vishal Agraharkar
Jennifer Clark
New York University Brennan Center for Justice
161 Avenue of the Americas
New York, NY 10013-0000

/s/ Chad W. Dunn
Chad W. Dunn