

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

TEXAS STATE LULAC; VOTO LATINO, §  
*Plaintiffs,* §

v. §

BRUCE ELFANT, in his official capacity as the §  
Travis County Tax Assessor-Collector; §  
JACQUELYN CALLANEN, in her official §  
capacity as the Bexar County Elections §  
Administrator; ISABEL LONGORIA, in her §  
official capacity as the Harris County Elections §  
Administrator; YVONNE RAMON, in her §  
official capacity as the Hidalgo County Elections §  
Administrator; MICHAEL SCARPELLO, in his §  
official capacity as the Dallas County Elections §  
Administrator; and LISA WISE, in her official §  
capacity as El Paso County Elections §  
Administrator, §

*Defendants,* §

And §

KEN PAXTON, in his official capacity as §  
Attorney General of Texas; LUPE C. TORRES, §  
in his official capacity as Medina County §  
Elections Administrator; and TERRIE §  
PENDLEY, in her official capacity as Real §  
County Tax Assessor-Collector, §

*Intervenor-Defendants.* §

Civil Action No. 1:21-cv-546-LY

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**INTERVENOR-DEFENDANTS LUPE C. TORRES AND TERRIE PENDLEY’S  
NOTICE OF JOINDER TO DEFENDANT-INTERVENOR KEN PAXTON’S MOTION  
FOR SUMMARY JUDGMENT (ECF NO. 138)**

Intervenor-Defendants Lupe C. Torres, in his official capacity as Medina County Elections Administrator, and Terrie Pendley, in her official capacity as Real County Tax Assessor-Collector, hereby join Defendant-Intervenor Ken Paxton’s Motion for Summary Judgment (ECF No. 138). As the motion explains, this Court should grant summary judgment for the Intervenor-Defendants,

because Plaintiffs lack standing to assert their claims. *See* Paxton’s Mot. for Summary Judgment, ECF No. 138, Part II. Furthermore, this Court should grant summary judgment for the Intervenor-Defendants, because Plaintiffs have not shown that SB 1111 burdens the right to vote. *See id.* at Part III.B. In any event, even if Plaintiffs could show a minimal burden, the State’s interests far outweigh it. *See id.* Finally, SB 1111 does not violate the Twenty-Sixth Amendment, providing another reason that this Court should grant summary judgment for the Intervenor-Defendants. *See id.* at Part III.C.

Therefore, this Court should grant Defendants and Intervenor-Defendants summary judgment. Intervenor-Defendants Torres and Pendley take no position regarding the interpretation of Texas Election Code § 1.015(b).

Respectfully submitted,

*/s/ Autumn Hamit Patterson*

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically on May 9, 2022, with the Clerk of the Court for the United States District Court for the Western District of Texas by using the CM/ECF system, causing electronic service upon all counsel of record.

*/s/Autumn Hamit Patterson*  
AUTUMN HAMIT PATTERSON

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