

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, §

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

*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.* §

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**INTERVENOR-DEFENDANTS LUPE C. TORRES AND TERRIE PENDLEY'S  
NOTICE OF JOINDER TO DEFENDANT-INTERVENOR KEN PAXTON'S REPLY IN  
SUPPORT OF MOTION FOR SUMMARY JUDGMENT (ECF NO. 168)**

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 Reply in Support of Motion for Summary Judgment (ECF No. 168). As the reply explains, this Court should grant summary judgment for

the Intervenor-Defendants and Defendants for several reasons. For starters, Plaintiffs lack Article III standing, statutory standing, and third-party standing. *See* Paxton’s Reply, ECF No. 168, Parts I–II. Moreover, Plaintiffs have not shown that SB 1111 burdens the right to vote. *See id.* at Part III.B. Finally, SB 1111 does not violate the Twenty-Sixth Amendment. *See id.* at Part III.C.

This Court should therefore grant summary judgment for Defendants and Intervenor-Defendants. 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 June 10, 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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