

2021-57207

*Texas State Conference of the NAACP, et al.*

*Plaintiffs,*

v.

*Greg Abbott, in his official capacity as the Governor of Texas, et al.,*

*Defendants.*

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

189th JUDICIAL DISTRICT

**ORIGINAL ANSWER FOR GOVERNOR GREG ABBOTT, TEXAS ATTORNEY GENERAL KEN PAXTON, AND DEPUTY SECRETARY OF STATE JOE ESPARZA**

**TO THE CLERK OF THE COURT AND ALL COUNSEL:**

Greg Abbott, in his official capacity as Governor of Texas, Ken Paxton, in his official capacity as Attorney General of Texas, and Joe Esparza, in his official capacity as Deputy Secretary of State, (*collectively* Defendants) file this Original Answer.

**I. General Denial**

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, and without waiving the right to file any or further specific denials, special exceptions, affirmative defenses, pleas, pleadings, or motions, Defendants generally deny each and every allegation contained in the Petition and demand strict proof thereof.

**II. Affirmative Defenses**

- a. Plaintiffs' claim lacks a basis in law. Tex. R. Civ. P. 91(a).
- b. Plaintiffs' suit is barred by res judicata.
- c. Plaintiffs' suit is barred by collateral estoppel.
- d. Plaintiffs' suit is barred by equitable estoppel.

Date: October 8, 2021

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Attorney General of Texas

BRENT WEBSTER  
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Respectfully submitted.

/s/ Patrick K. Sweeten  
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